

**PUBLIC NOTICE OF A MEETING FOR
STATE OF NEVADA BOARD OF PSYCHOLOGICAL EXAMINERS
MEETING MINUTES**

July 10, 2026

1. Call To Order/Roll Call to Determine the Presence of a Quorum.

Board President Lorraine Benuto, PhD, called to order the meeting of the Nevada State Board of Psychological Examiners at 8:04 a.m. on July 10, 2026, online via "Zoom" and physically at the office of the Board of Psychological Examiners, 3080 S. Durango Drive, Suite 102, Las Vegas, Nevada 89117.

Roll Call:

Before calling roll, Executive Director Sarah Restori welcomed the Board's three new Board members, Dr. Brian Leany, Dr. Michael Moradshahi, and Dr. Craig Wetterer.

Board President, Lorraine Benuto, PhD, Secretary/Treasurer, Stephanie Woodard, PsyD, and members, Monique Abarca, Brian Leany, PhD, Robert Moering, PsyD, Michael Moradshahi, PhD, and Craig Wetterer, PhD were present. There was a quorum of the Board members.

Also present were Deputy Attorney General (DAG) Harry Ward; Board Investigators Dr. Sheila Young and Dr. Whitney Owens; Board Consultant, Dr. Gary Lenkeit; Executive Director, Sarah Restori, and Board Staff, Laura Arnold. Members of the public who were present were: Brian Lech, Erica Hanna, Jacqueline Eddy, James Smith, James Tenney, Jamie Ross, Dr. Jodi Thomas, Kristi Walter, Lindsey Bondiek, Takisha Cooper, Dr. Yvonne Fritz, and Becky Savio.

2. Public Comment. Note: The Board welcomes public comment, which may be limited to three (3) minutes per person at the Board President's discretion. Public comment will be allowed at the beginning and end of the meeting, as noted on the agenda. The Board President may allow additional time to be given a speaker as time allows and in their sole discretion. Comments will not be restricted based on viewpoint; however, public comment will not be taken on complaints that are pending before the Board. No action will be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action may be taken (NRS 241.020).

Dr. Benuto reminded members of the public that general public comment is reserved for comment only, and that comments longer than three minutes should be submitted in writing to the board office to be included in the meeting materials.

DAG Ward welcomed the new Board members, reminded those who speak at the meeting to identify themselves for the record and explained why, and requested that members of the public not comment on complaints pending before the Board.

Ms. Restori stated that, other than the written public comment provided regarding one of the Board's pending regulations (the summary of which is attached pursuant to request), there was no public comment in the Board office. Ms. Restori also stated that the Board office was notified by a member of the public that the December 12, 2025, minutes state that there was no public comment at this stage of the meeting. While there was no verbal public comment during that meeting, a member of the public did provide written public comment, which, prior to that meeting, was received by the Board office, received and reviewed by the Board members, and was made part of public record for the December 12, 2025, meeting.

3. Minutes. (For Possible Action) Discussion and Possible Action to Approve the Minutes of the State of Nevada Board of Psychological Examiners' April 17, 2026, Meeting.

DAG Ward explained for the new Board members that they could vote on approving the minutes by indicating their vote being to form, not substance. He stated that, under the open meeting law, minutes from a prior meeting are to be approved at the next meeting, but because the new members were not at the prior meeting, their vote would be as to the form of the minutes, not their content.

Dr. Moering noted that he was designated in the minutes as a PhD, and he is a PsyD. Ms. Restori stated that correction would be made.

On motion by Stephanie Woodard, second by Robert Moering, the Nevada Board of Psychological Examiners approved the meeting minutes of the Regular Meeting of the Board held on April 17, 2026, with the correction to Dr. Moering's credential. Dr. Robert Moering, Dr. Brian Leany, Dr. Michael Moradshai, and Dr. Craig Wetterer approved as to form, not content. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

4. Financials

- A. (For Possible Action) Discussion and Possible Action to Approve the Final Treasurer's Report for Fiscal Year 2025 (July 1, 2024 - June 30, 2025).

Ms. Arnold stated that as of June 30, 2026, which concluded the 2026 Fiscal Year, the Board had a combined total of about \$214,000 in checking and savings. She explained that the closing treasurer's report for FY2026 includes several adjustments to bring the budget side close to a zero sum balanced budget, and that the final, adjusted FY2026 budget would inform the FY2027 Budget. Ms. Arnold said that the Board ended FY2026 with a deficit of about \$17,400, and that the reasons for that deficit included the 40% increase in the fees the Attorney General's office charges the Board that had been made retroactive for the fiscal year, the expensive disciplinary hearing that took place in November, and some other fiscal surprises, such as the 75% increase in IT fees and the required change in worker's compensation insurance, none of which could not have been anticipated prior to the fiscal year. Ms. Arnold explained that the deficit will be carried forward to FY2027 with the hope and idea that FY2027, which includes license renewals, will absorb that deficit and leave a balanced budget in reference to actual income and expense. Ms. Arnold went on to note that it was the combination of the unusual and surprise fiscal factors that impacted the Board's finances in FY2026. She also stated that, in an effort to reduce the Board's legal fees and based on her background as a Nevada licensed attorney with an extensive background in providing legal research and writing services in the context of complex litigation, she has taken on some of the legal writing and any required legal research in reference to the Board's pending complaint cases to help ease DAG Ward's workload, to help move the complaints along, and to save in legal fees for the Board. She said the savings from those efforts are being reflected in the billing the Board has been receiving from the Attorney General's office.

Ms. Arnold went on to mention that, with the costs and fees to the Board continuing to increase from many different fronts and the fact that she and Ms. Restori have been unable to realize cost of living increases to their salaries or salaries that reflect who comprises the Board staff, the Board will need to consider revising its fee regulation to increase its licensure fees after the 2027-28 renewal period so that it can comfortably accommodate its increasing fiscal obligations and ensure sufficient financial reserves.

Dr. Woodard thanked Ms. Arnold for keeping a close eye on the budget for the last year and for keeping the Board updated on an ongoing basis, especially around the unforeseen expenses that have impacted the FY2026 budget. Dr. Woodard asked if Ms. Arnold anticipated those to be one-time costs or whether they will be ongoing. Ms. Arnold stated that the ongoing costs are going to be the fee increases for the AG's office, the IT expenses, and the worker's compensation insurance. She said she would be budgeting around those fee increases for FY2027, and that she would be keeping an eye on and monitoring the costs for the Board's hourly employees in reference to the employee policy.

Dr. Moering asked how often the Board has seen increases from the AG's office. Ms. Arnold stated that the FY2026 fee increase was the first one that she experienced, and

that the increase should not be something that occurs frequently. She also noted that the annual audit fees increased. Dr. Woodard noted that Ms. Arnold had continued to forecast for the Board the ongoing cost increases, and that it will be important when preparing the FY2027 budget as it concerns the Board's increasing operational costs.

Dr. Moering stated that an increase in licensure fees is something the Board is going to have to consider and discuss sooner than later, and asked for Ms. Arnold's perspective on what that fee increase may look like. Ms. Arnold stated that she would address that under the agenda item for the budget.

On motion by Robert Moering, second by Brian Leany, the Nevada Board of Psychological Examiners approved the Treasurer's Report for Fiscal Year 2026. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer). Motion Carried: 7-0.

B. (For Possible Action) Discussion and Possible Action to Approve the Proposed Budget for Fiscal Year 2027.

Ms. Arnold requested that the Board table the budget agenda item to the next meeting. She explained that the Board office has been extremely busy, and that she wants to give some extra thought and analysis to the FY2027 budget based on the FY2026 fiscal performance as well as the different nature of FY2027 – one that straddles the end of one biennium and the beginning of the next biennium, and includes renewals. She said that with the current demands on the Board office, she was unable to have the meaningful time the budget deserves since the June 30, 2026, end of FY2026, and that she would have a proposed budget for the Board's next meeting in August. She also said that she would put an item on the agenda for the next meeting to review a proposed licensure fee increase and offer some scenarios around that.

Dr. Benuto thanked the Board office staff for their hard work and wanted to be sure that the Board is able to compensate them commensurate with their backgrounds and experience, as well as the monumental nature of the work that they do.

Dr. Moering asked if the meeting agenda could also include a discussion on increasing the full time Board staff's compensation, to which Dr. Benuto said yes and explained that Ms. Arnold would provide a financial analysis as it relates to the board fees and staff salaries. Dr. Benuto appreciated Dr. Moering bringing up those issues for future discussion.

C. (For Possible Action) Discussion and Possible Action to Approve the Proposed Engagement Letter from Campbell Jones Cohen CPAs for the Fiscal Year 2026 Audit.

Ms. Arnold stated that Campbell Jones Cohen CPAs has provided their proposed engagement letter for the FY26 Audit, and that they quoted a total of \$18,000.00 for the annual audit, which is a \$1,500 increase over what the firm charged last year.

On motion by Stephanie Woodard, second by Craig Wetterer, the Nevada Board of Psychological Examiners approved the Proposed Engagement Letter from Campbell Jones Cohen CPAs for Fiscal Year 2026. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer). Motion Carried: 7-0.

5. Legislative/Regulation Update

Ms. Arnold stated that there were no updates beyond the regulations information that was in the regulations and legislation table and is part of the meeting packet.

6. Report from the Nevada Psychological Association.

There was no report from the Nevada Psychological Association.

7. Board Office Operations.

A. Report from the Board Office on Operations

Executive Director Sarah Restori provided an update on the Board's licensure, applicant, state exam, and provisional licensure/registrant statistics for April, May, and June 2026. She stated that the Board licensed 11 psychologists and administered 17 state exams, and received 25 new applications for licensure. She further stated that the Board currently has 148 open applications for licensure, which reflects the high volume of incoming applications and the influx of new applications. Ms. Restori said the Board currently has 777 licensed psychologists, 41 provisionally licensed psychological assistants and psychological interns, and 49 registered psychological trainees.

Ms. Restori also gave an update on current activities and projects. She stated that renewals for the 2027-28 biennium will open in August, and that the Board office is preparing for renewals and the reminder notifications to be sent to licensees. Ms. further reported that the ASPPB continues to develop the integrated EPPP exam, which will replace the current EPPP1 and EPPP2 examinations, and is expected to be implemented in the fall of 2027, with the beta version expected to be available in Spring 2027. As for the Healthcare workforce working group of which she is a member and which is developing a health care provider database, Ms. Restori stated that a preliminary work force survey was sent to the Board's licensees in June as requested by the working group. She said that moving forward, licensing boards will be required to include the workforce survey with license renewals and new licensure.

B. Board Officer Voting

- i. (For Possible Action) Discussion and Possible Action to Select Officers for the State of Nevada Board of Psychological Examiners for a One-Year Term from July 1, 2026 through June 30, 2027, from the Current Board Membership.

For the Board officer elections, Dr. Benuto stated that she is currently the Board president and that Dr. Woodard is currently the Board's secretary/treasurer. Both Dr. Benuto and Dr. Woodard stated that they were willing to continue in their current, respective roles unless other Board members had interest in them. Dr. Benuto stated that Ms. Abarca is the current continuing education review officer. Because Ms. Abarca left the meeting, Dr. Benuto stated that the Board would hold off on that election until Ms. Restori can check with her on whether she would like to continue. As for the Non-Resident Consultant Application Review Officer, Dr. Benuto stated that Dr. Esmaeili held that role and her term ended at the end of June 2026.

Dr. Benuto asked the Board members if anyone had any interest in any of the officer roles. Ms. Restori stated that, for the Non-Resident Consultant Application Review officer, the Board rarely gets those applications and it is a simple and straightforward process.

Dr. Benuto asked if any of the Board members wanted to nominate another Board member or themselves for a Board officer role. Dr. Moering volunteered for the Non-Resident Consultant Application review officer role.

On motion by Robert Moering, second by Michael Moradshahi, the Nevada Board of Psychological Examiners approved reelecting Dr. Benuto and Dr. Woodard to continue in their roles as Board president and secretary/treasurer, respectively. (Yea: Lorraine Benuto, Stephanie Woodard, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer). Motion Carried: 6-0.

On motion by Stephanie Woodard, second by Brian Leany, the Nevada Board of Psychological Examiners approved electing Dr. Moering to the Non-Resident Consultant Application Review officer role. (Yea: Lorraine Benuto, Stephanie Woodard, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer). Motion Carried: 6-0.

- ii. (For Possible Action) Discussion and Possible Action to Select the Membership of the Application Tracking Equivalency and Mobility (ATEAM) Committee for a One year Term from July 1, 2026, through June 30, 2027, from the Current Board Membership.

Ms. Restori stated that the Board currently has one ATEAM member, and Dr. Benuto acknowledged Dr. Moering's service on the ATEAM and thanked him for his engagement in that role. Dr. Benuto noted that because Dr. Holland and Dr. Esmaeili have rotated off the Board, there are vacancies on the ATEAM, and confirmed with Ms. Restori that a 3 member ATEAM is ideal. Dr. Benuto also confirmed Dr. Moering's willingness to continue in his role on the ATEAM. Dr. Moradshahi and Dr. Wetterer both expressed interest in serving on the ATEAM.

On motion by Robert Moering, second by Stephanie Woodard, the Nevada Board of Psychological Examiners approved electing Dr. Moradshahi and Dr. Wetterer to the vacant ATEAM positions. (Yea: Lorraine Benuto, Stephanie Woodard, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer). Motion Carried: 6-0.

8. (For Possible Action) Discussion and Possible Action on Pending Consumer Complaints.

This item was taken out of order.

DAG Ward stated that he would be asking for Board action on some of the complaints pending before the Board.

- Complaint #23-0918. DAG Ward stated that this complaint made various claims of improper conduct. The Respondent, who is represented by counsel, agreed to a stipulated disciplinary consent agreement, the fully executed version of which was included in the meeting materials and before the Board for approval. DAG Ward requested that the Board approve the stipulated consent agreement.

On motion by Robert Moering, second by Monique Abarca, the Nevada State Board of Psychological Examiners approved the Stipulated Consent Agreement in Complaint #23-0918. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #25-0110 – DAG Ward stated that this complaint alleged unlicensed practice in Nevada as part of a forensic psychological evaluation that occurred in Nevada. The Respondent's initial response to the complaint raised concerns about their participation in the evaluation and a stipulated consent agreement

was proposed to the Respondent. In response to the proposed agreement, the attorney and the Nevada psychologist involved in the case for which the evaluation was conducted provided further explanation in an effort to clarify what appeared to be a misunderstanding in the Respondent's response, and to explain the limited assistance the Respondent provided that did not include the practice of psychology. Based on the explanation and declarations of the attorney and Nevada psychologist regarding the Respondent's participation in the Nevada evaluation, the Board investigator recommended that the complaint be closed, and that a follow up cease and desist be forwarded to the Respondent to ensure clarity regarding Nevada law. Based on the Board investigator's recommendations, DAG Ward requested that the Board take action to close the complaint with a follow up cease and desist letter to the Respondent.

On motion by Monique Abarca, second by Robert Moering, the Nevada State Board of Psychological Examiners closed Complaint #25-0110 with a follow up cease and desist letter to be sent to the respondent. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #25-1231 – DAG Ward stated that this is a complaint regarding the failure to provide requested records. The respondent provided a response to the complaint, and the investigator has considered additional information provided by the complainant. Based on the information provided during the investigation, the investigator has recommended a stipulated consent agreement, to which the respondent agreed and which has been fully executed. The agreement was included in the meeting materials and was before the Board for approval. DAG Ward requested that the Board approve the stipulated consent agreement.

On motion by Monique Abarca, second by Robert Moering, the Nevada State Board of Psychological Examiners approved the stipulated consent agreement in Complaint #25-1231 . (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #26-0120(1) – DAG Ward stated that this was a complaint alleging unlicensed practice of psychology by a marriage and family therapist. A cease and desist letter was sent to the Respondent. Based upon the respondent's response, a follow up cease and desist letter was sent to the Respondent with specific directives and the MFT Board was copied on that letter. Based on the Board investigator's recommendation, DAG Ward requested that this matter be closed at this time, subject to being reopened if need be.

On motion by Stephanie Woodard, second by Craig Wetterer, the Nevada State Board of Psychological Examiners closed Complaint #25-0120(1). (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #26-0213 – DAG Ward stated that this is a complaint regarding alleged improper therapeutic process of a minor child. The Complaint was forwarded to the respondent, who, through counsel, provided a response. Based on the Board investigator's review of the complaint and response, the Board investigator determined that there were no violations that warranted further action and recommended dismissal. Based on the Board investigator's recommendation, DAG Ward requested that the Board dismiss this complaint.

On motion by Robert Moering, second by Stephanie Woodard, the Nevada State Board of Psychological Examiners dismissed Complaint #26-0213. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #26-0402 – DAG Ward stated that this is a complaint regarding a delay in the complainant's receipt of their child's independent educational evaluation from the respondent. The complaint was forwarded to the respondent, who provided a response and relevant documentation regarding the timeliness of the report provided to and communications with the complainant. Based on the Board investigator's review of the complaint and response, dismissal was recommended. DAG Ward requested that the Board dismiss this complaint.

On motion by Brian Leany, second by Monique Abarca, the Nevada State Board of Psychological Examiners dismissed Complaint #26-0402. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- Complaint #26-0420 – DAG Ward stated that this is a complaint regarding a court-ordered evaluation. Despite requests for the information the Board requires for such complaints, the Complainant did not provide that information. Pursuant to the Board's policy regarding such complaints, DAG ward requested that the Board dismiss this complaint.

On motion by Stephanie Woodard, second by Robert Moering, the Nevada State Board of Psychological Examiners dismissed Complaint #26-0420. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

9. (For Possible Action) Review and Possible Action on Applications for Licensure as a Psychologist or Registration as a Psychological Assistant, Intern, or Trainee. The Board May Convene in Closed Session to Receive Information Regarding Applicants, Which May Involve Considering the Character, Alleged Misconduct, Professional Competence or Physical or Mental Health of the Applicant (NRS 241.030). All Deliberation and Action Will Occur in an Open Session.

This item was taken out of order after Item 2.

The following applicants were recommended for approval of licensure contingent upon completion of licensure requirements: **Thomas Kiely, Spring Richardson, Brenda Gomez, Arianne Fisher, Isaac Florez, Brian Raines, Yu Wai Chiu, Monela Beroni, Dana Caggiano, Alexandra Hershberger, Michael McConnell, Amanda Zintsmaster, Elazar Tehrani, Rhonda Greenberg, Brenda Frye, Laura Korkoian, Kristine Jacquin, Barbod Salimi, Edward Smith, Maiken Gale, Eileen Callahan, Sharon Howard.**

On motion by Monique Abarca, second by Stephanie Woodard, the Nevada State Board of Psychological Examiners approved the following applicants for licensure contingent upon completion of licensure requirements: Thomas Kiely, Spring Richardson, Brenda Gomez, Arianne Fisher, Isaac Florez, Brian Raines, Yu Wai Chiu, Monela Beroni, Dana Caggiano, Alexandra Hershberger, Michael McConnell, Amanda Zintsmaster, Elazar Tehrani, Rhonda Greenberg, Brenda Frye, Laura Korkoian, Kristine Jacquin, Barbod Salimi, Edward Smith, Maiken Gale, Eileen Callahan, Sharon Howard. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

- A. (For Possible Action) Discussion and Possible Action on Psychological Assistant Dr. Jacqueline Eddy's request for an exemption under NAC 641.080(2)(b)(2)(I) and (II).

Dr. Benuto stated that Dr. Jacqueline Eddy, who is provisionally licensed with the Board as a Psychological Assistant, has requested that she be exempted from the supervised clinical service requirements of NAC 641.080 in favor of completing her last four months of supervised hours as a visiting assistant professor at the UNLV clinical psychology program. Dr. Benuto invited questions and comments from the Board.

Ms. Restori clarified that Dr. Eddy is requesting Board approval to complete her final four months of post-doctoral experience in a faculty position at UNLV that would not meet the weekly clinical and face-to-face percentages in the regulation, but would remain under supervision pursuant to her supervised practice plan.

Dr. Benuto stated that the Board has discretion to make exceptions and, therefore, to consider Dr. Eddy's request. She said that, several years ago, the Board developed language within the NAC that concerned faculty members in clinical programs in Nevada the ability to count direct service hours on research activities related to clinical practice. She explained that, relevant to this case, UNLV is developing a PsyD program, and the work in which Dr. Eddy will be involved will be in developing clinical training materials, practices, etc. Although that does not fall directly into clinical research specified in the NAC, the Board has the discretion to make an exception, and given the work that Dr. Eddy will be doing, it is highly relevant to clinical practice. Dr. Benuto said it is similar to the language in the NAC.

Dr. Lenkeit stated that if Dr. Eddy does not meet the minimum number of hours for face-to-face contact required for clinical service hours, he would be concerned that she would not be eligible for the APIT through PsyPact. Ms. Restori clarified that the request includes Dr. Eddy frontloading the required clinical service hours, and Dr. Eddy stated that she is completing 100% of her required clinical service hours under her current supervision arrangement, and when she transitions to the faculty role in the fall, she will have completed what is required for supervised clinical practice.

Dr. Benuto explained that the NAC's current requirements provide for a certain number of supervised clinical hours to be completed per week, and that the NAC does not provide for the total number of hours through the post-doctoral year regardless of when they are completed. She stated that Dr. Eddy has completed the total number of clinical hours required for licensure, and that what Dr. Eddy is requesting is that, during the last few months of her post-doctoral year, she be exempted from the number of face-to-face hours per week based upon her having completed all of the supervised clinical hours required for licensure.

Dr. Leany confirmed that Dr. Eddy is asking for an exemption from the 12 month requirement as it concerns the number of supervised hours spread out per week, to which Dr. Benuto clarified that she will still complete 12 months, but will have completed all of the required clinical hours prior to the completion of the 12 months.

Dr. Benuto explained that, rather than completing additional face-to-face hours during the last few months of her post-doctoral year, Dr. Eddy will be embarking on the important task of developing academic curriculum as it relates to mental health services and providers in Nevada for the inaugural incoming cohort.

Dr. Erica Hanna, program director of the new PsyD in clinical psychology program at UNLV, stated that she would be who will supervise Dr. Eddy for the last 4 months of Dr. Eddy's post-doctoral experience.

Dr. Moradshahi inquired as to whether the clinical hours could be completed in conjunction with the Dr. Eddy's new faculty role. Dr. Hanna explained that the program, which was just approved, is not a clinic, but is rather a program in the college of liberal arts that will launch in the fall of 2027. She further stated that, under her supervision, Dr. Eddy will be completing all of the program development hours. To provide clinical hours, Dr. Eddy would need to find a separate position at a clinic where she could provide direct face-to-face hours, which she would not be able to do under Dr. Hanna's supervision. She also stated that developing the curriculum for the 5 year sequence for the PsyD degree will be an intense process, which would limit the amount of time Dr. Eddy would have to do clinical work.

Dr. Benuto stated that, when the Board received Dr. Eddy's request, she did some research regarding what counts as a "clinical hour", and noted that, when students apply for an internship program, "program development" counts as direct service delivery, which is essentially what Dr. Eddy will be doing. She noted that, for whatever reason, it does not appear to be classified that way in the NAC, but that Dr. Eddy will be engaging in a form of service delivery, albeit not therapy.

For purposes of clarity, Dr. Woodard stated that by the time Dr. Eddy transfers into the new position, she will have completed all of her required clinical service hours, but will have abbreviated the time that she did so from 12 months to 8 months. She said she did not know if the Board had ever contemplated allowing the required clinical hours to be expedited, but it seems as though the Board has some discretion to consider it. She deferred to the Board investigators to offer input on whether this would set a precedence or whether the Board has considered a similar request in the past.

Dr. Owens stated that, historically, there have not been exceptions for teaching hours, but given that Dr. Eddy completed all of her clinical hours, an exception in this case

makes sense. She said the Board may not want clinical service hours to be expedited in consideration of APIT or other credentials, which require supervised hours to be completed in between 12-24 months, so that Dr. Eddy is not shortchanged when it comes to those credentials. However, because Dr. Eddy has already completed her clinical hours, the request seems commensurate with licensure in Nevada.

Dr. Young supported what Dr. Owens and Dr. Lenkeit said – if the Board is going to allow this exception, it may limit mobility, as it will be impossible years down the road to go back and get those four months on the record for purposes of licensure in another state and/or an APIT authorization.

Dr. Benuto confirmed with Dr. Eddy that she would be completing a 12 month post-doctoral program, but that the allocation of the week-to-week distribution is the exception that she is requesting, which Dr. Eddy confirmed. Dr. Eddy reiterated that she has completed 100% of her required post-doctoral clinical hours, but that she will be completing a 12 month post-doctoral program.

Dr. Lenkeit wondered if it is really an exception if Dr. Eddy has completed the required number of clinical hours and she is simply transferring the remainder of her supervised post-doctoral year to another facility. While Dr. Benuto believed that was philosophically correct, the NAC technically states that those in their post-doctoral year must complete a certain amount of supervised clinical hours per week throughout that year, and that is where the technical or logistical exception is being made. Dr. Eddy has otherwise met all of the requirements for licensure, and Dr. Benuto thought that extended to mobility. Dr. Lenkeit recommended approving Dr. Eddy's request based on the circumstances under which the request was made, but cautioned about someone coming before the Board with an exception request because they met all of the requirements in six months. To that end, Dr. Lenkeit stated that Dr. Eddy has met the requirements for licensure and that the approval should be for her to move to a new facility for the final few months of her post-doctoral year.

Dr. Hanna confirmed that Dr. Eddy would continue to receive weekly supervision while in the faculty position, and that her activities would be in program development, developing clinical training experiences for the students who will be in the program, and course design.

Dr. Lenkeit and Dr. Woodard suggested a motion that did not include the approval being an exception, to which Dr. Benuto stated that, technically, it is an exception based on the NAC language that concerns the weekly supervised clinical hours requirement. Dr. Lenkeit believed that the technicality is very minor and did not require an exception, to which Dr. Benuto reiterated that it is technically an exception based on the NAC language.

On motion by Dr. Leany, second by Dr. Wetterer, the Nevada State Board of Psychological Examiners approved Dr. Eddy's request that she be permitted to complete her last four months of supervised practice hours as a visiting professor at the UNLV clinical psychology program under Dr. Hanna's supervision. (Yea: Lorraine Benuto, Stephanie Woodard, Monique Abarca, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 7-0.

10. (For Possible Action) Discussion and Possible Action on Updates Regarding the Work of the 2025 SB165 Behavioral Health and Wellness Practitioner Advisory Group.

Dr. Benuto inquired as to whether there were any updates from the BHWP Advisory Group. Ms. Arnold stated that the Group is continuing its work on the BHWP regulations required by SB165 and assuming that the Group receives an LCB draft, a regulation hearing on those regulations was anticipated for the August 21, 2026, meeting. Ms. Arnold further stated that there were no updates regarding funding for the Board office to assist in the work that is and will be required for the additional licensure designation that the legislature housed under the Board. Dr. Benuto noted that SB165 is a substantial workload that the Board office is being required to undertake in addition to its regular duties and related to the discussion regarding the Board's finances and compensation for Board staff.

Member of the public Dr. Cooper stated that she is working with the school of social work at UNR in implementing SB165 in reference to, among other things, the program's curriculum and the scope of practice for the new licensure. Dr. Cooper was wondering if there were any updates, stating that they would be meeting with Nevada Medicaid regarding reimbursement and will be interested in hearing from the school districts regarding roles for the BHWPs. Dr. Cooper asked if a copy of the proposed regulations was available, which Ms. Arnold affirmed and stated that she would provide Dr. Cooper with a link to them via the Legislature's website.

11. (For Possible Action) Discussion and Possible Action on the Board's Residency Requirements for Applicants from Non-APA Accredited Doctoral Programs.

This item was taken out of order.

Dr. Benuto stated that the ATEAM requested Board review of blended or hybrid residencies of some non-APA accredited programs for substantial equivalency as it relates to the Board's one-year residency requirement in NAC 641.062. She said that the materials that are before the Board include two of those programs and their residency requirements that are embedded in the application materials for some current applicants that come from those non-APA accredited programs.

Ms. Restori explained that the ATEAM has historically reviewed applicants from non-APA doctoral programs to determine if their education is substantially equivalent to the Board's educational requirements in NAC 641.062, including the residency requirement. She said that as these non-APA accredited programs have evolved and used the blended or hybrid residency models rather than the traditional campus-based programs, and the ATEAM has approved applicants from some of those programs as substantially equivalent; however, recent ATEAM reviews have raised questions about whether they currently satisfy the substantial equivalency requirement.

Dr. Moering said that when reviewing the requirements of NAC 641.062 and the ASPPB's residency definition, they are clear that training models that rely exclusively on physical presence for periods of less than one continuous year, such as multiple long weekends and or intensive sessions, or that use teleconference or other electronic means as a substitute for any part of the minimum requirement for physical presence at the institution, do not meet the definition of residency. He stated that, based on the definitions of residency, the hybrid or blended programs do not meet substantial equivalency. For instance, a residency that requires its students to be physically present for a week once or twice a year does not meet the Board's residency requirements. On that basis, Dr. Moering was unsure why some applicants from these programs have historically been approved.

Dr. Benuto asked to hear from Board members on how the Board wants to consider what does meet the requirement for residency. Dr. Moering thought that the prior approvals given to some applicants from these programs may have been due to the COVID pandemic when there was a year period of time in which there was no in-person residency component. After the pandemic, however, applicants still had 2 additional years to be able to meet the one-year residency requirement, and it appears that

current applicants from the non-APA accredited programs with blended or hybrid residencies are requesting the same exception. He said that exception no longer applies.

Dr. Benuto asked Dr. Moering, as a member of the ATEAM, what he was seeing in his reviews that does meet substantial equivalency. Dr. Moering stated he has not seen anything that would meet equivalency. Ms. Restori explained that the applicants over the year have come from the same schools, so the ATEAM is seeing the same hybrid residencies. Dr. Moering added that at least one of the programs (Walden) is writing letters on behalf of applicants from their program stating that the applicant has met their requirement for residency, but their requirements for residency does not match the Board's requirements for residency. One or more other non-APA accredited programs' websites specifically state that their program does not meet the requirements for Nevada licensure.

Dr. Owens stated that she was a founding member of the ATEAM, and that back in 2017, the Legislature required that the behavioral health boards evaluate applications for licensure based on substantial equivalency. She said that, at the time, the ATEAM and the legislature were getting a lot of pressure from the blended learning programs to evaluate their applications because they believed their programs were substantially equivalent to an APA-accredited program. Dr. Owens stated that they made the determination to review those applications with the understanding that, when it comes to licensure, there are a lot of checks and balances – education, residency, internship, post-doctoral training, the EPPP. Those checks and balances help ensure that an applicant has the appropriate education and training to become a psychologist. In the hundreds of equivalency reviews Dr. Owens has undertaken since 2017 between Nevada and through the ASPPB mobility program and for APIT and CPQ, the programs with the blended learning model are not substantially equivalent, but because of the exception the Board made in 2018, it began reviewing those applications through the ATEAM. Dr. Owens stated that Dr. Moering is correct, and something that is seen in ATEAM reviews is that, even between applicants from the blended learning programs, the diversity of those applications is great. She said some applicants' education and training through practica look similar to APA-accredited applicants, and some are very distinct and different. With that history, Dr. Owens noted that over the last 5 years, only 5 applicants from those programs have made it to licensure, and about 35 never made it to licensure because they are unable to complete the requirements for licensure, such as sufficient training or passing the required examinations.

In reference to the historical context that Dr. Owens provided and the impact that COVID had on education and training during that time, Dr. Benuto noted that the Board

is at a different place in time. She also referred to one of the non-APA programs that specifically states it does not meet Nevada's requirements, but the Board nevertheless receives applications from those who attended those programs believing that they meet substantial equivalency based on the hybrid or blended residency. In her opinion, Dr. Benuto did not believe that programs with a hybrid residency that only requires a couple of weekends a year does not meet substantial equivalency.

Ms. Restori emphasized how important it is for the Board to discuss and consider this issue based on the difficulty in reviewing the applications from hybrid or blended non-APA accredited programs and the need to establish consistency. Dr. Benuto suggested that the Board discuss what a working definition of equivalency would look like to help guide the ATEAM. She asked the Board members what they thought equivalency would look like.

Dr. Wetterer, who teaches at an APA-accredited PsyD program, noted that the Board's residency requirement is quite clear – it is one year in residence, and the hybrid/blended models do not meet that. He suggested a totality of circumstances approach that looks at total contact hours, nature of the training, etc., and have clear parameters around what substantial equivalency would look like if considering a program that does not have a full-time residency. These blended programs are spread across multiple years where they are having yearly sessions for 2 or 3 days that do not add up to a year in residence. Ms. Restori clarified that the programs that are coming to the top are those that attest to being primarily online and having a blended year in residence. Dr. Moering stated that, where the Board has a law that provides the educational and residency requirements, the ATEAM should be following the statute, and the programs the ATEAM is reviewing do not meet the legal requirements. He said that if the Board wants to make a change in reference to the non-APA programs, then the change should start with changing the requirements provided by law. Dr. Benuto agreed. She again noted that the COVID pandemic may have created some flexibility at the time, but that is no longer at issue or the moment the Board is in.

Dr. Owens stated that the APA has accredited some predominantly online programs such as Fielding, that, within their 3 years of education, has about 600 hours of in person meetings such as week-long intensives, weekend intensives, and orientation. She thought it would behoove the Board to consider what those programs look like and what APA accreditation is going to look like going forward for programs that do blended learning so that the ATEAM has a solid metric by which to undertake reviews. Otherwise, it is confusing for the applicant, the Board office, and the ATEAM. Dr. Moering stated that if these programs become APA accredited, this becomes a moot point for the Board, but at this moment, they are not accredited. Dr. Benuto thought

that some of the historical approval of some of the blended non-APA accredited program applicants may have been based on the fact that the APA has accredited blended program models such as Fielding. She queried whether the Board wanted to make exceptions to its education and residency requirements based on there being APA accredited programs that do have blended learning models or does it want to stick to the plain language of the Board's regulatory requirements.

Dr. Lenkeit agreed with Dr. Moering that the Board should abide by the letter of the law in reference to the Board's education and residency requirements. He said that if the law changes or the APA accredits blended learning institutions, that is a different matter. But until that happens, he recommends following the Board's legal requirements for education and residency, and agreed that the blended programs do not meet Nevada's residency requirement. He also noted that the applicants from the non-APA blended programs would not be able to obtain PsyPact credentials.

Dr. Benuto thought that the Board generally agrees that it wants to ensure that the psychologists that it licenses in Nevada are able to provide competent and ethical services, and inquired about whether the Board is inclined to follow the letter of the law or whether it wants to allow some flexibility. Dr. Owens stated that she did not disagree with Dr. Moering and that the easier the Board can make it for these reviews, the better. She suggested whatever guidance the Board provides be clear so that there can be good decision making around the review process. Dr. Moering suggested that, for the blended unaccredited programs that may be similar to Fielding, which is APA-accredited, there must be a reason that the APA has determined they do not meet APA accreditation standards. Dr. Young thought it was important for students in the non-APA accredited blended programs to have good information. She was concerned that, by letting them register with the Board, it is giving them the idea that they have a path to licensure in Nevada, and the Board should be clear that it will not accept their applicant fee payments knowing they do not meet licensure requirements. Dr. Benuto thought that was a good point.

Dr. Benuto invited further input from the Board members. Dr. Leany said that if the Board is not considering changing the educational and residency requirements stated in the Board's statutes and regulations, then it should follow the plain language of those legal requirements. Dr. Woodard agreed with Dr. Leany. Dr. Wetterer agreed that, because the legal requirements are clear, ATEAM reviews should follow the statutory framework. Dr. Moradshahi agreed, and asked what is actually required. Dr. Moering explained that the ATEAM is ensuring that non-APA accredited programs are providing education and training equivalent to an APA-accredited program.

Dr. Benuto noted the Board's consensus that ATEAM reviews should be in accordance with the statutory and regulatory language.

12. (For Possible Action) Discussion and Possible Action to Approve the Board Office Employees' Performance Evaluations.

Dr. Benuto reiterated her earlier comments regarding the outstanding work by the Board office's full time staff and all that they do to keep the office running smoothly and to support the Board members and the public. Dr. Moering acknowledged the amount of work that the Board staff does, and Dr. Woodard noted the amount of work that gets done behind the scenes by the Board's investigative staff to ensure the Board can uphold ethics and standards.

On motion by Robert Moering, second by Stephanie Woodard, the Nevada State Board of Psychological Examiners approved the performance evaluations for the Board's full time and investigative staff. (Yea: Lorraine Benuto, Stephanie Woodard, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 6-0.

13. (For Possible Action) Discussion and Possible Action on Board Staff Vacation Request.

Dr. Benuto stated that a board staff member has a vacation scheduled for September and that she seeks to use some of the unused vacation time from FY26 toward that vacation of 10 or 11 business days.

On motion by Robert Moering, second by Craig Wetterer, the Nevada State Board of Psychological Examiners approved Dr. Eddy's request that she be permitted to complete her last four months of supervised practice hours as a visiting professor at the UNLV clinical psychology program under Dr. Hanna's supervision. (Yea: Lorraine Benuto, Stephanie Woodard, Brian Leany, Robert Moering, Michael Moradshahi, and Craig Wetterer.) Motion Carried: 6-0.

14. (For Possible Action) Schedule of Future Board Meetings, Hearings, and Workshops. The Board May Discuss and Decide Future Meeting Dates, Hearing Dates, and Workshop Dates.

Dr. Benuto stated that the next regular meeting of the Nevada Board of Psychological Examiners is scheduled for Friday, August 21, 2026, beginning at 8:00 a.m. The Board did not indicate any conflicts with that date.

15. Requests for Future Board Meeting Agenda Items (No Discussion Among the Members will Take Place on this Item)

Other than the requests that were made earlier in the meeting, there were no requests from the Board for future Board Meeting agenda items.

16. Public Comment - The Board welcomes public comment, which may be limited to three minutes per person at the Board President's discretion. Public comment will be allowed at the beginning and end of the meeting, as noted on the agenda. The Board President may allow additional time to be given a speaker as time allows and in their sole discretion. Comments will not be restricted based on viewpoint; however, public comment will not be taken on complaints that are pending before the Board. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action may be taken (NRS 241.020).

Members of the public were reminded that they were not permitted to comment on pending complaints before the Board.

There was no public comment.

Before adjourning, Dr. Benuto acknowledged Dr. Holland's and Dr. Esmaeili's service to the Board. She stated that they have now rotated off the Board after many years of service, for which she thanked them. Dr. Benuto also welcomed the new board members and thanked them for their willingness to serve.

17. (For Possible Action) Adjournment

There being no further business before the Board, President Dr. Benuto adjourned the meeting at 9:41 a.m.

BRIEF SUMMARY OF WRITTEN PUBLIC COMMENT FOR JULY 10, 2026 MEETING MATERIALS AND MINUTES

Regarding: LCB File No. R089-26I: Criminal Conduct and Reporting Requirements

Submitted to: Nevada Board of Psychological Examiners (NBOPE)

Submitted by: Rebecca Savio

Date: July 2, 2026

I submit this brief summary to accompany my full written public comment and exhibits regarding LCB File No. R089-26I, the proposed regulation concerning criminal and other conduct not related to the practice of psychology as a basis for discipline and related licensee reporting requirements.

This brief summary is submitted as a shorter companion to my full written public comment also being submitted on this same date, and I have requested that the full written comment and exhibits be included in the July 10, 2026 meeting packet, meeting materials, regulation-hearing materials, and R089-26I rulemaking record.

I offer this comment in a spirit of cooperation and shared concern for public safety, public trust, due process, and a clear rulemaking record. I recognize that the Board, Board staff, and Board counsel must balance public protection, fairness to licensees, administrative practicality, confidentiality, and legal authority. My purpose is to help ensure that the final regulation and public record are clear, balanced, and protective.

Because my full written comment is lengthy, I do not ask that the full text be reproduced in the body of the minutes. I respectfully request that this brief summary be attached to, linked in, incorporated by reference in, or otherwise clearly identified in the meeting minutes for the July 10, 2026 Board meeting and in the record for any next noticed regulation hearing at which R089-26I is considered.

I also request that this brief summary, my full written comment, and exhibits be included in or appended to the July 10 meeting packet, supplemental meeting materials, regulation-hearing materials, complete R089-26I rulemaking record, and materials submitted to the Legislative Counsel Bureau as part of the regulation record, so that Board members and members of the public can locate the full submission from the public meeting materials.

For clarity, my full written public comment is submitted with supporting exhibits for inclusion in the meeting materials, regulation-hearing materials, LCB materials, and R089-26I rulemaking record. Those supporting materials include: Exhibit A, chronology and comparison chart; Exhibit B, April 17, 2026 written public comment excerpt or summary; Exhibit C, comparison of Nevada behavioral-health and healthcare reporting models and NBOPE's current reporting baseline; Exhibit D, summary of prior written public comments incorporated by reference; Exhibit E, the May 21, 2026 Board-provided Survey of Nevada Licensing Boards regarding criminal and/or other conduct and reporting requirements; and Exhibit F, relevant transcript and approved-minutes excerpts.

I request that the meeting minutes, meeting materials, and rulemaking record clearly identify where the full written comment and Exhibits A–F are located so members of the public can review the complete submission.

I also respectfully request that the Board make a verbal notation during the July 10 meeting, or as applicable, during the next meeting or hearing at which R089-26I is considered, stating that written public comment was received for LCB File No. R089-26I and included in the meeting packet or meeting materials. I request this so the meeting transcript and oral record clearly reflect that written public comment was received and linked to this specific LCB file and regulation topic.

In summary, my full 28-page written comment asks the Board to address four related issues before final action:

1. whether R089-26I should require earlier reporting of serious criminal charges and relevant filed civil actions, rather than requiring reporting only after conviction, plea, judgment, settlement, or other final adjudication;
2. where in the public record the adjudicated-only reporting model was discussed, explained, adopted, or otherwise selected;
3. whether, after proposed subsection 1(C), concerning “habitual or excessive use of alcohol or controlled substances,” was struck, the substance-use-related impairment concern discussed in October 2025 was intentionally omitted, addressed through another remaining provision, reserved for future rulemaking, or already covered by existing authority; and
4. how written public comments and supporting materials will be clearly identified, preserved, and connected to the official minutes, meeting materials, and rulemaking record.

My central concern is that the current draft of R089-26I may leave the Board without timely notice of serious pending matters. As drafted, the proposed regulation appears to require reporting of criminal matters only after conviction or plea, and civil malpractice matters only after judgment or settlement. It does not appear to require reporting when a serious criminal charge is filed or when a relevant civil action is filed.

If serious pending charges are not self-reported, the Board may learn of them only through media coverage, a third-party complaint, another agency, internet or court-record searches, or chance discovery. That creates a public-protection notice gap. My full written comment also addresses related gaps in the Board’s biennial renewal, reactivation, and reinstatement forms, including whether those forms clearly ask about arrests, pending criminal charges, criminal complaints, indictments, filed civil actions, convictions, pleas, judgments, or settlements.

I am not asking the Board to discipline licensees based on allegations, and I am not asking the Board to treat a criminal charge as proof of misconduct. I am asking for a reporting rule that provides timely notice to the Board so it can review serious pending matters on a case-by-case basis, with due process and appropriate safeguards, and determine whether no action, further inquiry, monitoring, interim protections, or other appropriate action is warranted. **Reporting is not discipline. Reporting is notice.**

My full written comment also addresses the development history of the proposed reporting language. Earlier Board discussions and staff materials appear to have involved broader concepts, including arrests, charges, convictions, civil actions, criminal conduct, other conduct, substance-use-related impairment, public protection, and reporting requirements. By March 6, 2026, however, the staff report and discussion presented adjudicated-only reporting as an already-existing Board preference. I have not located a public meeting record showing where or how that preference was discussed, explained, adopted, or otherwise selected.

I also ask the Board to clarify the treatment of proposed subsection 1(C), which concerned “habitual or excessive use of alcohol or controlled substances.” The October 2025 discussion appears to have identified substance-use-related impairment, DUI-related conduct, assessment authority, remediation, and public protection as significant reasons for considering regulatory change. At the March 6, 2026 meeting, proposed subsection 1(C) was struck before the draft advanced to workshop. I understand the concerns raised about the terms “habitual” and “excessive,” and I am not asking the Board to adopt vague or overbroad language. My request is that the public rulemaking record clearly explain whether the Board intended to remove the substance-use-impairment concern entirely, address it through another remaining provision, revise it with clearer language, reserve it for future rulemaking, or rely on existing authority.

This issue matters because patient harm and professional impairment are not always confined to the formal therapy hour. A licensee’s impaired judgment, substance-use-related conduct, or inappropriate communication with a client outside a scheduled session may still arise from, affect, or undermine the professional relationship, even if it does not occur during the session itself. A regulation addressing impairment-related concerns can be protective and remedial, not merely punitive.

My full written comment also addresses written public comment and supporting materials. My December 12, 2025 and January 23, 2026 written public comments were included in meeting packets, but they were not clearly attached to, linked in, summarized in, or identified with the corresponding approved minutes. The December 12, 2025 approved minutes state that there was “no public comment,” even though my written public comment and reference list were included in the pre-meeting packet. I request that the Board make the connection clear in the public record and R089-26I rulemaking record so future reviewers can locate the written comments without reconstructing the history from separate packets, minutes, staff reports, recordings, and correspondence.

The full comment also addresses the Board-provided “Survey of Nevada Licensing Boards - Criminal and/or Other Conduct Not Related to the Profession as a Basis for Disciplinary Action and Reporting Requirements,” which was provided to me by Board staff as a courtesy on May 21, 2026. That survey appears relevant because it identifies multiple Nevada licensing boards that require reporting of criminal charges or other non-final criminal matters, and appears to identify the Board of Psychological Examiners as “No” for criminal and/or other conduct not related to the profession as a basis for discipline. I request that the survey and any related comparative materials used,

reviewed, summarized, or relied on in developing R089-26I be included or clearly identified in the public rulemaking record.

Before final action, I respectfully request that the Board either revise R089-26I to require earlier reporting of at least serious pending criminal charges and relevant filed civil actions, or explain on the record why it rejects that approach despite comparable Nevada behavioral-health and healthcare reporting models. I also request that the Board clarify how it intends to address the substance-use-related impairment concern discussed at length during development of the proposed regulation, and how written public comments and supporting materials will be preserved and identified in the public record.

I also request that the Board follow through on its April 23, 2026 statement that my April 17, 2026 written public comment “will be included as an attachment to the April 17, 2026 meeting minutes once the minutes are finalized and approved by the Board.” I further request that the December 12, 2025, January 23, 2026, April 17, 2026, and current July 10, 2026 written public comments, including this brief summary, be attached to, linked in, incorporated by reference in, or otherwise clearly identified in the R089-26I public record and rulemaking record.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Rebecca Savio

Rebecca Savio

Public comment contact: pinnaclelegalresearch@gmail.com