

# NEVADA STATE BOARD OF OPTOMETRY



## NOTICE OF INTENT TO ACT UPON TEMPORARY REGULATION

Notice of Hearing for the Adoption of  
**proposed revisions to R066-19(8)(4)**  
[R066-19A.pdf](#)\*

Pursuant to NRS 233B.060(1)(b), the Nevada State Board of Optometry will hold a public hearing at **12:15pm (pst) on the 11<sup>th</sup> day of December 2024** through remote and in-person means:

<https://us06web.zoom.us/j/81771040189?pwd=rVgah6V2pxr4wYEBh2NhtpzQxz4Clv.1>

Meeting ID: 817 7104 0189

Passcode: 154355

Telephone: 1 669 900 6833

Nevada Business Center  
Tahoe Room  
3300 W. Sahara Ave., 4<sup>th</sup> Floor  
Las Vegas, Nevada 89102

The purpose of the hearing is to receive comments from all interested persons regarding **proposed revisions to R066-19(8)(4)** [R066-19A.pdf](#)\* which pertain to chapter 636 of the Nevada Administrative Code.

The following information is provided pursuant to the requirements of NRS 233B.0603:

(1)(a)(1) The need and purpose of the temporary regulation or amendment.

NRS/NAC 636 govern optometry. R066-19(8), which was already the subject of oversight and Legislative Counsel Bureau (LCB) adoption in 2019-2020, governs how continuing education (herein "CE") hours are credited to licensees for purposes of biennial license renewal requirements.

R066-19 has yet to be codified, so the Board seeks additional clarification on this topic for its membership and all interested persons with the subject modifications to: 1) align with national

standards<sup>1</sup> of 70% minimum passing scores for asynchronous courses; and 2) clarify that “in person” includes synchronous videoconference courses. Synchronous CE courses, be it a licensee’s actual in-person attendance or virtual in-person attendance via an internet platform such as Zoom or Teams or similar videoconferencing, are exempt from the testing requirement offered at the conclusion of a CE course in order for a licensee to receive credit.

(1)(a)(2) If the proposed regulation is a temporary regulation, either the terms or substance of the proposed regulation or a description of the subjects and issues involved.

**Bolded font** = proposed new language; ~~strikethrough~~ = proposed removed language

4. Continuing education may be completed in person, over the Internet or by correspondence or videoconference. **As used in this section, “in person” includes synchronous internet or videoconference courses.** For continuing education that is not completed in person, the licensee must submit proof that he or she received a score of at least ~~75~~ **70** percent on the examination for the course.

(1)(a)(3) If the proposed regulation is a permanent regulation, a statement explaining how to obtain the approved or revised text of the proposed regulation prepared by the Legislative Counsel pursuant to [NRS 233B.063](#).

N/A. The subject proposed revisions to R066-19 are not a proposed permanent regulation at this time.

(1)(a)(4) The estimated economic effect of the regulation on the business in which it is to regulate and on the public. These must be stated separately and in each case must include:

(I) Adverse and beneficial effects on optometry-

The Board does not perceive that CE credits’ minimum passing scores for asynchronous courses will have any adverse economic effects, nor does clarifying that in-person attendance for synchronous CE courses can also include in its definition virtual attendance via videoconferencing platform.

Adverse and beneficial effects on the public-

The Board does not perceive any adverse effects on the public. This regulation is unique to optometrists and obtaining sufficient CE credits in order to be licensed for the then-upcoming biennial cycle. To the extent any effects on the public are seen, the modifications ensure for the protection of the profession and the public that licensees in Nevada: 1) have nationalized standard passing scores for their asynchronous CE courses (*see* footnote 1); and 2) can obtain credit by attending virtually on a videoconference platform for synchronous online CEs, potentially allowing licensees additional time to see patients if not required to attend all CEs in-person.

(II) Immediate and long-term effects on optometry-

Although not formally codified by LCB yet, R066-19 became law in 2020. Therefore the Board

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<sup>1</sup> [COPE+Course+Qualification+Manual+12.2022+FINAL.pdf](#) at page 19 (“Post Course tests must receive a score of at least 70% or better in order for a certificate of completion to be issued.”)

has a small sample size to address this topic. The minimum passing score stated in R066-19(12)(8)(4) of 75% to the proposed 70% will align Nevada into national conformity on this issue. *See* footnote 1. CE presenters or companies are already in the stream of commerce in Nevada, and the change of a passing score from 75% to 70% will not affect their business models. Clarifying that in-person attendance for synchronous CE courses can include virtual attendance via videoconferencing platform will likewise not affect the provision of optometry services.

#### Immediate and long-term effects on the public-

The Board considers the proposed changes in the regulation to have more impact on a licensee's CE hours than having any impact on the public. R066-19(8)(4) in its 2020 form is already effective law upon Nevada-licensed optometrists. A plain reading of R066-19(8)(4)'s text and the proposed revisions demonstrates it is not a mandate or a restriction on how licensees practice optometry, which is a core focus of NRS/NAC 636 in addition to maintaining integrity of the profession and protecting the public. Instead it requires a licensee, in the event of the licensee electing to complete an asynchronous CE course, to obtain a passing score consistent with national standards of 70%. It is at any given licensee's discretion to choose to avail himself or herself to any such asynchronous CE courses, when synchronous CE courses are available to attend physically in-person or virtually in-person and do not require course examination passing score in order to receive credit.

(1)(a)(5) The methods used by the agency in determining the impact on a small business prepared pursuant to NRS 233B.0608(3).

Prior to the Notice of Workshop being posted, the Board issued a Newsletter to its membership announcing the topic of the workshop, and specifically seeking any membership input on the proposed changes.

The Agenda associated with the above referenced meeting is posted consistent with NRS 241 timely, and physically and electronically as stated in the Agendas- Nevada State Board of Optometry office, Reno, NV 89523, Nevada State Board of Optometry website: <https://nvoptometry.org>, and Nevada Public Notice website: <http://notice.nv.gov>

Any public comment or testimony provided concerning the proposed regulations could have been obtained from the Board of Optometry by mail, telephone request or by email at any time. Interested persons may obtain a summary of responses to the Board's solicitation of comments by contacting the Board office via email at [admin@nvoptometry.org](mailto:admin@nvoptometry.org). No such comments were obtained before or after the Board's workshop or its vote to approve the language in section (1)(a)(2) of this Notice on October 30, 2024 at its public meeting in compliance with Open Meeting Law standards.

(1)(a)(6) The estimated cost to the agency for enforcement of the proposed regulation.

The Board estimates that the adopted regulation will result in no additional costs. The Board's employees already count CE credits as approved when received from a qualified CE presenter on qualified topics. Whether a licensee attends a synchronous CE course physically in-person or virtually in-person does not result in any additional costs to the Board. Whether the passing score is 75% or 70% does not change how the Board's employees vet any proffered CE

credit from any licensee. There is no perceived cost to the licensees governed under NRS 636. There is no perceived cost to the public.

(1)(a)(7) A description of and citations to any regulation of other state or local governmental agencies which the proposed regulation overlaps or duplicates, and a statement why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, state the name of the regulating federal agency.

N/A. None of the regulation overlaps with any other state, local, or federal agency/regulation. No other chapter governs optometrists or the practice of optometry besides NRS 636/NAC 636.

(1)(a)(8) If the regulation is required pursuant to federal law, a citation and description of the federal law.

N/A. The regulation is not required by federal law.

(1)(a)(9) If the regulation includes provisions which are more stringent than a federal regulation that regulates the same activity, a summary of such provisions.

N/A. Nevada's minimum passing score (75%) to obtain credit for attending asynchronous CE courses is presently higher than national standards (70%). (See footnote 1.) None of the regulation overlaps with any other state, local, or federal agency/regulation. No other chapter governs optometrists or the practice of optometry besides NRS 636/NAC 636.

(1)(a)(10) The time when, the place where, and the manner in which interested persons may present their views regarding the proposed regulation.

12/11/2024 12:15p.m. (pst) through remote and in-person means:

<https://us06web.zoom.us/j/81771040189?pwd=rVgah6V2pxr4wYEBh2NhtpzQxz4Clv.1>

Meeting ID: 817 7104 0189

Passcode: 154355

Telephone: 1 669 900 6833

Nevada Business Center  
Tahoe Room  
3300 W. Sahara Ave., 4<sup>th</sup> Floor  
Las Vegas, Nevada 89102

Persons wishing to comment upon the proposed action of the Nevada State Board of Optometry may appear at the scheduled public hearing or may address their comments, data, views or arguments, in written form, to:

Nevada State Board of Optometry  
P.O. Box 1824  
Carson City, NV 89702

-or-

Email: [director@nvoptometry.org](mailto:director@nvoptometry.org)

Written submissions must be received by the Nevada State Board of Optometry on or before **December 3, 2024**. If no person who is directly affected by the proposed action appears to request time to make an oral presentation, the Nevada State Board of Optometry may proceed immediately to act upon any written submissions.

(1)(b) If the proposed regulation is a temporary regulation, state each address at which the text of the proposed regulation may be inspected and copied.

A copy of this notice and the regulation to be adopted will be on file at the State Library, Archives and Public Records, 100 Stewart Street, Carson City, Nevada, for inspection by members of the public during business hours. Additional copies of the notice and the regulation to be adopted will be available at the Nevada State Board of Optometry, 6170 Mae Anne Ave., Ste. 1, Reno, NV 89523 for inspection and copying by members of the public during business hours and [www.nvoptometry.org](http://www.nvoptometry.org) under the Boards Meeting tab at all times. This notice and the text of the proposed regulation are also available in the State of Nevada Register of Administrative Regulations, which is prepared and published monthly by the Legislative Counsel Bureau pursuant to [NRS 233B.0653](#), and on the Internet at <http://www.leg.state.nv.us/>. Copies of this notice and the proposed regulation will also be mailed to members of the public at no charge upon request.

(1)(c) Include an exact copy of the provisions of subsection 2 of [NRS 233B.064](#).

See section (1)(a)(2)

(1)(d) Whether the proposed regulation establishes a new fee or increases an existing fee.

No.

(1)(e) Mailed to all persons who have requested in writing that they be placed upon a mailing list, which must be kept by the agency for that purpose.

The agency will comply with any such request, but no such request has occurred.

(1)(f) Be submitted to the Legislative Counsel Bureau for inclusion in the Register of Administrative Regulations created pursuant to [NRS 233B.0653](#). The publication of a notice of intent to act upon a regulation in the Register does not satisfy the requirements for notice set forth in paragraph (e).

The agency will comply, i.e., upon adoption of any regulation, the agency, if requested to do so by an interested person, either before adoption or within 30 days thereafter, shall issue a concise statement of the principal reasons for and against its adoption and incorporate therein its reason for overruling the consideration urged against its adoption. This Notice has also been posted at the following locations:

Nevada State Board of Optometry at 6170 Mae Anne Ave., Ste. 1, Reno, NV 89523  
State Library, Archives and Public Records at 100 Stewart Street, Carson City, NV  
[nvoptometry.org](http://nvoptometry.org)

**Nevada State Board of Optometry, P.O. Box 1824, Carson City, NV 89702 775-883-8367**

[notice.nv.gov](http://notice.nv.gov)

Nevada Register of Administrative Regulations at <http://www.leg.state.nv.us/>

The Board will take reasonable measures to accommodate persons with disabilities who wish to attend the meeting. Please call (775) 883-8367 or email [admin@nvoptometry.org](mailto:admin@nvoptometry.org) in advance to make arrangements.

\*MEETING MATERIALS: The public may request these, including R066-19 itself, in advance by email to [admin@nvoptometry.org](mailto:admin@nvoptometry.org).

# NEVADA STATE BOARD OF OPTOMETRY



## NOTICE OF INTENT TO ACT UPON TEMPORARY REGULATION

Notice of Hearing for the Adoption of  
**proposed revisions to R066-19(12)**  
[R066-19A.pdf](#)\*

Pursuant to NRS 233B.060(1)(b), the Nevada State Board of Optometry will hold a public hearing at **12:15pm (pst) on the 11<sup>th</sup> day of December 2024** through remote and in-person means:

<https://us06web.zoom.us/j/81771040189?pwd=rVgah6V2pxr4wYEBh2NhtpzQxz4Clv.1>

Meeting ID: 817 7104 0189

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Telephone: 1 669 900 6833

Nevada Business Center  
Tahoe Room  
3300 W. Sahara Ave., 4<sup>th</sup> Floor  
Las Vegas, Nevada 89102

The purpose of the hearing is to receive comments from all interested persons regarding **proposed revisions to R066-19(12)** [R066-19A.pdf](#)\* which pertain to chapter 636 of the Nevada Administrative Code.

The following information is provided pursuant to the requirements of NRS 233B.0603:

(1)(a)(1) The need and purpose of the temporary regulation or amendment.

NRS/NAC 636 govern optometry. R066-19(12), which was already the subject of oversight and Legislative Counsel Bureau (LCB) adoption in 2019-2020, governs allowances and prohibitions to business relationships between optometrists and non-optometrist entities. R066-19 has yet to be codified, so the Board seeks additional clarification on this topic for its membership and all interested persons with the subject modifications as proposed in section (1)(a)(2) of this Notice.

(1)(a)(2) If the proposed regulation is a temporary regulation, either the terms or substance of the proposed regulation or a description of the subjects and issues involved.

**Nevada State Board of Optometry, P.O. Box 1824, Carson City, NV 89702 775-883-8367**

**Bolded font** = proposed new language; ~~strikethrough~~ = proposed removed language

1. If an optometrist forms an association or other business relationship with a physician pursuant to NRS 636.373, the optometrist must:

- (a) Comply with any applicable requirements of the Internal Revenue Service;
- (b) Maintain financial and organizational independence from any person who is not licensed to practice optometry, ~~other than the physician~~; and
- (c) Ensure that any advertising, marketing and promotional materials accurately portray the position of the optometrist within the association or business relationship, including, without limitation, whether the practice of the optometrist is included within any assumed or fictitious name used by the association or other business relationship.

2. An optometrist shall not employ or be employed by a physician.

~~3. An optometrist may form an association or other business relationship with a person, other than a physician, who is not licensed to practice optometry to perform duties concerning the operation of the business. Such duties must be limited to duties concerning the operation of the business and may include, without limitation, performing services related to payroll, human resources, real estate, regulatory matters not related to health care, banking, accounting, administration of benefits, marketing, merchandising, occupancy, accounts payable, accounts receivable, supply chain management, business development, business administration, labor, compliance with applicable laws and regulations, purchasing and medical billing.~~

~~4. An optometrist who forms an association or other business relationship with a person who is not licensed to practice optometry pursuant to subsection 3 shall:~~

**4. 3. An optometrist who forms an association or other business relationship with a person, business, or entity who is not licensed to practice optometry, including, but not limited to, relationships formed for purposes of providing the optometrist support in the operation of the business, such as payroll, human resources, business development, banking, supply chain management, medical billing and business administration shall:**

- (a) Comply with any applicable requirements of the Internal Revenue Service;
- (b) Maintain organizational and financial independence from the person who is not licensed to practice optometry and ensure that the person who is not licensed to practice optometry ~~is not involved in~~ **shall not dictate, control or influence:**
  - (1) Clinical decisions;
  - (2) Scheduling of patients;
  - (3) Any decision concerning scope of practice or use of facilities, equipment or drugs; or
  - (4) Any other decision concerning the provision of care to a patient or the outcome of any treatment or other service provided to a patient; ~~and~~
- (c) Ensure that any advertising, marketing and promotional materials accurately portray the position of the optometrist within the association or business relationship, including, without limitation, whether the practice of the optometrist is included within any assumed or fictitious name used by the association or other business relationship; **and**
- (d) **No association or other business relationship entered into by an optometrist with a person who is not licensed to practice optometry shall alter or lessen the optometrist's ultimate responsibility for all exercises of professional or clinical judgment with regard to**



**the conduct of the optometrist's professional practice or patient care.**

**(e) Nothing in this section shall eliminate a licensee's responsibility pursuant to NRS 636.373, NAC 636.240 and NAC 636.250 to not engage with any person, business, or entity not licensed to practice optometry who owns any part or portion of any Nevada optometry practice.**

(1)(a)(3) If the proposed regulation is a permanent regulation, a statement explaining how to obtain the approved or revised text of the proposed regulation prepared by the Legislative Counsel pursuant to [NRS 233B.063](#).

N/A. The subject proposed revisions to R066-19 are not a proposed permanent regulation at this time.

(1)(a)(4) The estimated economic effect of the regulation on the business in which it is to regulate and on the public. These must be stated separately and in each case must include:

(I) Adverse and beneficial effects on optometry-

The Board does not perceive any adverse economic effects. R066-19(12) is not mandatory for all licensees to expend capital or to enter into the kinds of business relationships discussed therein. Instead it is permissive to those licensees, many of whom are small business owners, who wish to avail themselves to different business associations, and not mandatory. Therefore should the licensee decide to enter into a certain kind of business relationship with a non-optometry entity, R066-19(12) allows the licensee to do so, so as long as the non-optometry entity does not control or dictate how the licensee performs his or her clinical/medical responsibilities to the patient in a manner consistent with the standard of care. R066-19(12) can be seen as a simultaneous allowance for business management services while ensuring the licensee does not lose autonomy within the scope of professional decision-making and judgment for optometric care in Nevada which only licensees under NRS 636 are allowed to exercise. Moreover, the intent of revising R066-19(12)(3)-(4) is consistent with another chapter of statutory healthcare providers, the Nevada State Board of Dental Examiners' NRS 631.215(2)(i) and (3)(a), 631.3455 which likewise passed legislative muster both in 2009 then again in 2023.

Adverse and beneficial effects on the public-

The Board does not perceive any adverse effects on the public. The intent of R066-19(12) concerns in part that a non-optometry entity does not control or dictate how the licensee performs his or her clinical/medical responsibilities to the patient in a manner consistent with the standard of care. Therefore the Board sees this as a benefit to the public of licensees maintaining that autonomy regarding clinical decision making and the exercise of optometric judgment based upon the needs of any given optometric patient, and not subject any non-optometry corporatization which potentially could place priority of profits over patients.

(II) Immediate and long-term effects on optometry-

Although not formally codified by LCB yet, R066-19 became law in 2020. Therefore the Board has a small sample size to address this topic. Clarification of R066-19(12) should assist licensees with a better understanding what kinds of non-clinical business services are permissible should a licensee seek to engage with a non-optometry entity for any such service. Clarification will help licensees, current non-optometric entities already in the stream of commerce in Nevada, and future prospective non-optometric entities who could seek to enter into the stream of commerce in

Nevada, to know what is permissible and not permissible within the confines of NAC 636.

Immediate and long-term effects on the public-

The Board considers the proposed changes in the regulation to have more impact on a licensee's business, business dealings, and business administration as opposed to any direct impact upon the public at large. The intent of R066-19(12) does not authorize a non-optometry entity to control or dictate how the licensee performs his or her clinical/medical responsibilities to the patient in a manner consistent with the standard of care. Therefore the Board does not see this regulation impacting the public in terms of patients receiving appropriate optometric care.

(1)(a)(5) The methods used by the agency in determining the impact on a small business prepared pursuant to NRS 233B.0608(3).

The Board conducted a workshop on July 31, 2024 and an second workshop on August 28, 2024. Written comments were provided by various persons and licensees prior to each workshop. The Board conducted a regular meeting on September 26, 2024 where public comments were offered and thereupon the proposed revisions in section of (1)(a)(2) of this Notice were voted upon and approved.

Notice of the July 31, 2024 workshop and August 28, 2024 workshop were sent to all registered licensees on the Board's email-mailing list. Agendas associated with the above referenced meetings were posted consistent with NRS 241 timely, and physically and electronically as stated in the Agendas- Nevada State Board of Optometry office, Reno, NV 89523, Nevada State Board of Optometry website: <https://nvoptometry.org>, and Nevada Public Notice website: <http://notice.nv.gov>

Any public comment or testimony provided concerning the proposed regulations could have been obtained from the Board of Optometry by mail, telephone request or by email at any time. Interested persons may obtain a summary of responses to the Board's solicitation of comments by contacting the Board office via email at [admin@nvoptometry.org](mailto:admin@nvoptometry.org).

(1)(a)(6) The estimated cost to the agency for enforcement of the proposed regulation.

In and of itself, none as to the agency. Known violations or known alleged violations of the regulation, however, will result in an investigation as authorized under NRS 636, and possible prosecution and discipline upon the alleged violator. Attorneys' fees and costs via the Board's assigned deputy attorney general may be incurred upon the Board for such prosecution.

(1)(a)(7) A description of and citations to any regulation of other state or local governmental agencies which the proposed regulation overlaps or duplicates, and a statement why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, state the name of the regulating federal agency.

N/A. None of the regulation overlaps with any other state, local, or federal agency/regulation. No other chapter governs optometrists or the practice of optometry besides NRS 636/NAC 636.

(1)(a)(8) If the regulation is required pursuant to federal law, a citation and description of the federal law.

N/A. The regulation is not required by federal law.

(1)(a)(9) If the regulation includes provisions which are more stringent than a federal regulation that regulates the same activity, a summary of such provisions.

N/A. None of the proposed regulation changes duplicates or is more stringent than any federal, state, or local standards regulating optometry to the best of the Board's knowledge.

(1)(a)(10) The time when, the place where, and the manner in which interested persons may present their views regarding the proposed regulation.

12/11/2024 12:15p.m. (pst) through remote and in-person means:

<https://us06web.zoom.us/j/81771040189?pwd=rVgah6V2pxr4wYEBh2NhptzQxz4Clv.1>

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Email: [director@nvoptometry.org](mailto:director@nvoptometry.org)

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(1)(c) Include an exact copy of the provisions of subsection 2 of [NRS 233B.064](#).

See section (1)(a)(2)

(1)(d) Whether the proposed regulation establishes a new fee or increases an existing fee.

No.

(1)(e) Mailed to all persons who have requested in writing that they be placed upon a mailing list, which must be kept by the agency for that purpose.

The agency will comply with any such request, but no such request has occurred.

(1)(f) Be submitted to the Legislative Counsel Bureau for inclusion in the Register of Administrative Regulations created pursuant to [NRS 233B.0653](#). The publication of a notice of intent to act upon a regulation in the Register does not satisfy the requirements for notice set forth in paragraph (e).

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\*MEETING MATERIALS: The public may request these, including R066-19 itself, in advance by email to [admin@nvoptometry.org](mailto:admin@nvoptometry.org).