FILED
NOV - 6 2015
Div. of Insurance
State of Nevada

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

IN THE MATTER OF THE

CAUSE NO. **14.0165**
LCB FILE NO. **R074-14**

REGULATION CONCERNING PRESCRIPTION DRUG FORMULARIES.

SUMMARY OF PROCEEDINGS AND ORDER

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SUMMARY OF PROCEEDINGS

A public workshop, as required by Nevada Revised Statute ("NRS") 233B.061, on proposed regulation LCB File No. R074-14 ("proposed regulation" or "R074-14") was held on July 29, 2014. Public hearings on the proposed regulation were held August 12, 2014; November 12, 2014; and October 20, 2015. The meetings took place at the offices of the Nevada Division of Insurance ("Division") in Carson City, with videoconferencing to the second floor conference room of the Bradley Building in Las Vegas. The proceedings were held before Hearing Officer Terri Chambers, appointed by the Commissioner by Order dated July 3, 2014, under Division's Cause No. 14.0165.

The regulation was proposed under the authority of NRS 679B.130, 687B.120, and 689A.710.

At the workshop and the two hearings held in 2014, Adam Plain, Insurance Regulation Liaison, presented the regulation on behalf of the Division. At the hearing held October 20, 2015, Glenn Shippey, Actuarial Analyst for the Life and Health Section, presented the regulation on behalf of the Division.

Based upon written comments received and testimony given, the Division proposed adoption of the regulation, LCB File No. R074-14, with no amendments.

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RECOMMENDED ORDER OF THE HEARING OFFICER

Based upon the testimony and the written comments received in this matter, it is hereby RECOMMENDED that the proposed regulation, LCB File No. R074-14, be adopted as a permanent regulation of the Division.

SO RECOMMENDED this 6th day of November, 2015.

TERRI CHAMBERS
Hearing Officer

ORDER OF THE COMMISSIONER

Having reviewed the record in this matter and the recommendation of the Hearing Officer,

IT IS HEREBY ORDERED that:

1. The proposed regulation, LCB File No. R074-14, be adopted as a permanent regulation of the Division. See Exhibit A.

2. The Informational Statement prepared pursuant to NRS 233B.066 shall be forwarded to the Legislative Counsel Bureau for legislative review and final adoption of the regulation. See Exhibit B.

SO ORDERED this 6th day of November, 2015.

AMY L. PARKS
Acting Commissioner of Insurance

CAUSE NO. 14.0165
LCB FILE NO. R074-14

SUMMARY OF PROCEEDINGS AND ORDER

EXHIBIT A

REVISED PROPOSED REGULATION OF THE

COMMISSIONER OF INSURANCE

LCB File No. R074-14

ADOPTED

August 3, 2015

EXPLANATION – Matter in *italics* is new; matter in brackets ~~[omitted material]~~ is material to be omitted.

AUTHORITY: §1, NRS 679B.130, 687B.120 and 689A.710; §2, NRS 679B.130 and 687B.120; §3, NRS 679B.130.

A REGULATION relating to health benefit plans; prohibiting certain persons that offer certain health benefit plans which provide coverage for prescription drugs and use a drug formulary approved by the Commissioner of Insurance from making changes to the formulary except under certain circumstances; and providing other matters properly relating thereto.

Legislative Counsel's Digest:

Existing law provides that any health insurance policy or contract, health care plan or certificate of coverage delivered or issued for delivery in this State must be filed with and approved as to form by the Commissioner of Insurance. (NRS 687B.120) For various forms of health insurance that provide coverage for prescription drugs, existing law requires that the insured or enrollee be notified by the insurer about whether the coverage is subject to a "formulary" or a list of covered drugs. If a formulary is used, the required notice must include specified information about the formulary and additional information must be made available to insureds, enrollees and providers of health care. (NRS 689A.405, 689B.0283, 689C.281, 689C.455, 695A.255, 695B.176, 695C.1703, 695F.153, 695G.163)

Section 1 of this regulation prohibits an individual carrier that offers a health benefit plan from removing a drug from its approved formulary unless the United States Food and Drug Administration: (1) does not approve the drug; (2) questions the clinical safety of the drug; or (3) approves the drug for use without a prescription. If the individual carrier's approved formulary includes two or more tiers of benefits providing for different deductibles, copayments or coinsurance applicable to the prescription drugs in each tier, **section 1** also prohibits the individual carrier from moving a brand name drug to a tier with a larger deductible, copayment or coinsurance, unless the individual carrier adds a generic alternative to the brand name drug at: (1) the tier from which the brand name drug is being moved; or (2) a tier that has a smaller deductible, copayment or coinsurance than the tier from which the brand name drug is being moved. **Section 2** of this regulation adopts the same provisions for individual coverage that is provided by a health maintenance organization. Other forms of health insurance are unaffected by this regulation.

Section 1. Chapter 689A of NAC is hereby amended by adding thereto a new section to read as follows:

1. Except as otherwise provided in this section, an individual carrier that offers a health benefit plan which provides coverage for prescription drugs and uses a formulary that has been approved by the Commissioner pursuant to NRS 687B.120 shall not:

(a) Remove a prescription drug from the formulary; or

(b) If the formulary includes two or more tiers of benefits providing for different deductibles, copayments or coinsurance applicable to the prescription drugs in each tier, move a drug to a tier with a larger deductible, copayment or coinsurance,

during the plan year for which the formulary was approved by the Commissioner.

2. An individual carrier described in subsection 1 may:

(a) Remove a prescription drug from a formulary at any time if:

(1) The drug is not approved by the United States Food and Drug Administration;

(2) The United States Food and Drug Administration issues a notice, guidance, warning, announcement or any other statement about the drug which calls into question the clinical safety of the drug; or

(3) The prescription drug is approved by the United States Food and Drug Administration for use without a prescription.

(b) If the individual carrier's formulary includes two or more tiers of benefits providing for different deductibles, copayments or coinsurance applicable to the prescription drugs in each tier, move a brand name prescription drug to a tier with a larger deductible, copayment or coinsurance if the individual carrier adds to the formulary a generic prescription drug that is

approved by the United States Food and Drug Administration for use as an alternative to the brand name prescription drug at:

(1) The benefit tier from which the brand name prescription drug is being moved; or

(2) A benefit tier that has a smaller deductible, copayment or coinsurance than the benefit tier from which the brand name prescription drug is being moved.

3. This section does not prohibit an individual carrier from adding a prescription drug to a formulary at any time.

4. This section does not apply to a grandfathered plan.

5. As used in this section:

(a) "Health benefit plan" has the meaning ascribed to it in NRS 687B.470.

(b) "Individual carrier" has the meaning ascribed to it in NRS 689A.550.

Sec. 2. Chapter 695C of NAC is hereby amended by adding thereto a new section to read as follows:

1. Except as otherwise provided in this section, a health maintenance organization that offers a health benefit plan in the individual market which provides coverage for prescription drugs and uses a formulary that has been approved by the Commissioner pursuant to NRS 687B.120 shall not:

(a) Remove a prescription drug from the formulary; or

(b) If the formulary includes two or more tiers of benefits providing for different deductibles, copayments or coinsurance applicable to the prescription drugs in each tier, move a drug to a tier with a larger deductible, copayment or coinsurance,

➥ during the plan year for which the formulary was approved by the Commissioner.

2. A health maintenance organization described in subsection 1 may:

(a) Remove a prescription drug from a formulary at any time if:

(1) The drug is not approved by the United States Food and Drug Administration;

(2) The United States Food and Drug Administration issues a notice, guidance, warning, announcement or any other statement about the drug which calls into question the clinical safety of the drug; or

(3) The prescription drug is approved by the United States Food and Drug Administration for use without a prescription.

(b) If the health maintenance organization's formulary includes two or more tiers of benefits providing for different deductibles, copayments or coinsurance applicable to the prescription drugs in each tier, move a brand name prescription drug to a tier with a larger deductible, copayment or coinsurance if the health maintenance organization adds to the formulary a generic prescription drug that is approved by the United States Food and Drug Administration for use as an alternative to the brand name prescription drug at:

(1) The benefit tier from which the brand name prescription drug is being moved; or

(2) A benefit tier that has a smaller deductible, copayment or coinsurance than the benefit tier from which the brand name prescription drug is being moved.

3. This section does not prohibit a health maintenance organization from adding a prescription drug to a formulary at any time.

4. This section does not apply to a grandfathered plan.

5. As used in this section, "health benefit plan" has the meaning ascribed to it in NRS 687B.470.

Sec. 3. This regulation becomes effective on January 1, 2016.

CAUSE NO. 14.0165
LCB FILE NO. R074-14

SUMMARY OF PROCEEDINGS AND ORDER

EXHIBIT B

LEGISLATIVE REVIEW OF ADOPTED REGULATIONS
INFORMATIONAL STATEMENT AS REQUIRED BY NRS 233B.066

LCB FILE NO. R074-14

The following statement is submitted by the State of Nevada, Department of Business and Industry, Division of Insurance ("Division") for adopted amendments to Nevada Administrative Code ("NAC") Chapter(s) 689A and 695C.

1. A clear and concise explanation of the need for the adopted regulation.

Proposed regulation R074-14 ("proposed regulation" or "R074-14") is needed to protect individuals in Nevada that choose a health insurance policy for an upcoming calendar year based upon the inclusion and cost of specific medications from experiencing adverse changes in coverage for those medications during the policy period. The Patient Protection and Affordable Care Act requires health insurance plans to file formularies listing covered drugs. 45 C.F.R. 156.122(a)(2). Nevada law also requires that any health insurance policy or contract, health care plan or certificate of coverage delivered or issued for delivery in this State be filed with and approved as to form by the Commissioner of Insurance ("Commissioner"). NRS 687B.120.1(a). For various forms of health insurance that provide coverage for prescription drugs, existing law requires that the insured or enrollee be notified by the insurer about whether the coverage is subject to a "formulary," a list of covered drugs. Formularies must include specified information and additional information must be made available to insureds, enrollees and providers of health care.

2. A description of how public comment was solicited, a summary of public response, and an explanation of how other interested persons may obtain a copy of the summary.

(a) A description of how public comment was solicited:

Public comment was solicited by e-mailing the proposed regulation, notice of workshop, notices of intent to act upon the regulation, and small business impact statement to persons on the Division's mailing list requesting notification of proposed regulations. The documents were also made available on the website of the Division, http://doi.nv.gov/, mailed to the main library for each county in Nevada, and posted at the following locations:

Department of Business and Industry
Division of Insurance
1818 East College Parkway, Suite 103
Carson City, Nevada 89706

Department of Business and Industry
Division of Insurance
2501 East Sahara Avenue, Suite 302
Las Vegas, Nevada 89104

Legislative Building
401 South Carson Street
Carson City, Nevada 89701

Grant Sawyer Building
555 East Washington Avenue
Las Vegas, Nevada 89101

Blasdel Building
209 East Musser Street
Carson City, Nevada 89701

Capitol Building
101 North Carson Street
Carson City, Nevada 89701

Nevada Department of Employment,
Training and Rehabilitation
2800 E. Saint Louis Avenue
Las Vegas, Nevada 89104

The Division distributed drafts of the proposed regulation with each proposed change from the initial announcement of the regulation in June 2014, until the adoption hearing held on October 20, 2015. Public comment was also solicited at a workshop held on July 29, 2014, and at the hearings held on August 12, 2014; November 12, 2014; and October 20, 2015. The public meetings took place at the offices of the Division, 1818 East College Parkway, Carson City, Nevada 89706, with simultaneous videoconferencing to the Bradley Building, 2501 East Sahara Avenue, Las Vegas, Nevada 89104.

(b) A summary of the public response:

The Division received 39 written comments, and 21 persons testified at the hearings regarding R074-14. The comments and testimony addressed primarily two issues:

1. Those who favor the regulation as a means to prevent a health insurance carrier from doing a "bait and switch" or simply changing the terms of agreement regarding coverage for prescription drugs during the plan year without notice to consumers or without recourse for consumers who may have selected a health plan based on the formulary coverage at the start of the plan year.
2. Those who oppose the regulation because they believe that it prevents a carrier from being able to react to changes in the prescription drug marketplace, such as when a new drug or a new generic form of a drug is approved by the FDA.

(c) An explanation of how other interested persons may obtain a copy of the summary:

The summary in part 2(b) above reflects the comments and testimony that transpired with regard to regulation R074-14. A copy of the summary may be obtained by contacting Cliff King, Chief Insurance Examiner, Life and Health Section, at (775) 687-0700 or cking@doi.nv.gov. This summary will also be made available by e-mail request to insinfo@doi.nv.gov.

3. The number of persons who:

(a) Attended each hearing:

August 12, 2014:	28
November 12, 2014:	33
October 20, 2015:	22

(b) Testified at each hearing: August 12, 2014: 7
November 12, 2014: 9
October 20, 2015: 5

(c) Submitted to the agency written statements: 39

4. A list of names and contact information, including telephone number, business address, business telephone number, electronic mail address, and name of entity or organization represented, for each person identified above in #3 (b) and (c), as provided to the agency:

See Exhibit 1.

5. A description of how comment was solicited from affected businesses, a summary of their responses, and an explanation of how other interested persons may obtain a copy of the summary.

Comments were solicited from affected businesses in the same manner as they were solicited from the public. Please see the description, summary and explanation provided above in response to question #2.

6. If after consideration of public comment the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change.

The original draft of the regulation was amended, incorporating comments and testimony received from the workshop and hearings that were considered essential for the regulation. Each comment was considered in the drafting of the regulation; however, comments that were not incorporated into R074-14 were not germane to the issue addressed by the proposed regulation.

7. (a) The estimated economic effect of the adopted regulation on the business which it is to regulate:

(1) Both adverse and beneficial effects:

Insurers state that the regulation will prevent them from being able to move certain drugs from one tier to another mid-year when another drug is either introduced or withdrawn from the marketplace. This may prevent the insurer from introducing "step" processes mid-year or taking other actions as new drugs are introduced.

(2) Both immediate and long-term effects:

In the short-term an insurer is prevented from changing the drug formulary to its advantage, however, it will be able to make the adjustment for that particular drug on the next renewal. In the long-term, this may make the pricing and moving movement of drugs in the formulary more stable.

(b) The estimated economic effect of the adopted regulation on the public:

(1) Both adverse and beneficial effects:

The public will have the confidence that the drug plan included in their health benefit plans will remain stable for the one term of the policy. The public now complains that carriers conduct "bait and switch" tactics when the carrier offers drugs at one price (or tier) when the policy is purchased, but then changes the formulary mid-year, and the consumer is stuck with the change until the next renewal.

(2) Both immediate and long-term effects:

In both the short- and long-term, consumers will benefit by having a stable formulary that they can rely on; no more bait-and -switch issues.

8. The estimated cost to the agency for enforcement of the adopted regulations.

There is going to be no additional cost to the Division for enforcement of R074-14.

9. A description of any regulations of other state or government agencies which the proposed regulation overlaps or duplicates, and a statement explaining why the duplication or overlapping is necessary. If the regulations overlaps or duplicates a federal regulation, the name of the regulating federal agency.

There are no other state or government agency regulations that R074-14 duplicates.

10. If the regulation includes provisions that are more stringent than a federal regulation which regulates the same activity, a summary of those provisions.

There are no federal regulations that apply.

11. If the regulation establishes a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.

The agency is not assessing a new fee or increasing an existing fee.

August 12, 2014 Hearing – Persons who testified:

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Jack Kim	United Healthcare	P.O. Box 15645 Las Vegas, NV 89114-5645	702-240-8890	Jack.Kim@uhc.com
Maral Farsi	CVS Caremark	980 9th St. Suite 2100 Sacramento, CA 95814	Not given	Maral.farsi@cvscaremark.com
Jonah Houts	Express Scripts	300 New Jersey Ave, NW Suite 600 Washington, DC 20001	202-383-7983	jhouts@express-scripts.com
Linda Ash-Jackson	Hometown Health	830 Harvard Way Reno, NV 89502	775-982-3000	lash@hometownhealth.com
Judy Britt	Hometown Health	830 Harvard Way Reno, NV 89502	Not given	jbritt@hometownhealth.com
Jay Parmer	America's Health Insurance Plans	675 Sierra Rose Dr. #112 Reno, NV 89511	Not given	jayparmer@amstrats.com
Stacy Woodbury	Nevada State Medical Association	3660 Baker Lane, #101 Reno, NV 89509	775-825-6788	stacy@nsmadocs.org

November 12, 2014 Hearing – Persons who testified:

Jack Kim	United Healthcare	P.O. Box 15645 Las Vegas, NV 89114-5645	702-240-8890	Jack.Kim@uhc.com
Hui-Lim Ang	Colors of Lupus Nevada	Not given	Not given	Not given
Tina Armitage	The Colors of Lupus Nevada	8871 West Flamingo #202 Las Vegas, NV 89147	347-886-2674	TinaArmitage234@gmail.com
Maral Farsi	CVS Caremark	980 9th St. Suite 2100	Not given	Maral.farsi@cvscaremark.com
Keith Lee, Esq.	Nevada Association of Health Plans	Not given	Not given	keith@leelawoffice.net
Kristin Viswanathan	Biotechnology Industry Organization (BIO)	1201 Maryland Ave SW Washington, D.C. 20024	Not given	kviswanathan@bio.org
Cindy Laubacher	Express Scripts	Not given	916-771-3328	Cynthia_laubacher@express.scripts.com
Angela Fuss	Multiple Sclerosis Society	Not given	Not given	afuss@cfarcno.com
Grayson Wilt	Nevada State Medical Association	Not given	Not given	grayson@nsmadocs.org

October 20, 2015 Hearing – Persons who testified:

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Sara Partida	Nevada State Medical Association	631 N. Stephanie St., Ste. 202 Henderson, NV	Not furnished	sara@theperkinsco.com
Jenny Reese	Carrara Nevada/ PhRMA	Not given	Not given	jenny@carraranv.com
David Brewster	American Academy of Dermatology Association	1445 New York Ave. NW Washington, D.C.	202-340-2875	dbrewster@aad.org
Jeannette Belz	Nevada Psychiatric Association	10580 N. McCarran Blvd, #115-222 Reno, NV 89503	775-329-0119	jb@jkbelz.com
Elisa Cafferata	Nevada Advocates for Planned Parenthood Affiliates	550 W. Plumb Lane, c/o UPS Mail #B-104 Reno, NV 89509	775-412-2087	info@nevadaadvocates.org

Persons who provided written statements:

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Maral Farsi	CVS Caremark CVS Health	980 9th St. Suite 2100 Sacramento, CA 95814	916-203-9085	Maral.farsi@cvscaremark.com
Cynthia Laubacher	Express Scripts	One Express Way St. Louis, MO 63121	916-771-3328	Cynthia_laubacher@express.scripts.com
Barbara Levy	Pharmaceutical Care Management Association	601 Pennsylvania Avenue, NW Seventh Floor Washington, DC 20004	202-207-3610	Not given
Laurel Todd	Biotechnology Industry Organization	1201 Maryland Avenue SW Suite 900 Washington, DC 20024	202-962-9220	Not given
Mitchell Forman Stacy Woodbury	Nevada State Medical Association	3660 Baker Lane #101 Reno, NV 89509	775-825-6788	Not given
Not given	Hometown Health	Not given	Not given	Not given
Jonah Houts	Express Scripts	300 New Jersey Ave, NW Suite 600 Washington, DC 20001	202-383-7983	jhouts@express-scripts.com

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Not given	PhRMA	Not given	Not given	Not given
Grace Campbell	AHIP (America's Health Insurance Plans)	601 Pennsylvania Ave, NW South Building Suite Five Hundred Washington, DC 20004	202-778-3200	gcampbell@ahip.org
Krystin Herr	Arthritis Foundation, Pacific Region	3460 E. Sunset Road Suite K105 Las Vegas, NV 89120	702-367-1626	kherr@arthritis.org
Danielle Marano Philip Gattone	Epilepsy Foundation	8301 Professional Place East Suite 200 Landover, MD 20785-2353	301-459-3700	aostrom@efa.org
Nathaniel Counts	Mental Health America	2000 North Beauregard Street Floor 6 Alexandria, VA 22311	703-684-7722	ncounts@mentalhealthamerica.net
Elisa Cafferata	Nevada Advocates for Planned Parenthood Affiliates	550 W. Plumb Lane, c/o UPS Mail #B-104 Reno, NV 89509	775-412-2087 775-762-6141	info@nevadaadvocates.org
Stewart Ferry	National Multiple Sclerosis Society, Southern California & Nevada Chapter	4600 Kietzke Lane Suite K-225 Reno, NV 89502	510-872-0731	Not given
Michelle Rice Kathleen Verb Kelli Walters	Nevada Chapter of National Hemophilia Foundation	820 First Street NE Suite 720 Washington, DC 20002		mrice@hemophilia.org k.verb@hemophiliafed.org

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Meghan Buzby (International Myeloma Foundation)	State Patients Equal Access Coalition (SPEAC) Members as follows: AIM at Melanoma Association of Community Cancer Centers Cancer Support Community Community Oncology Alliance International Cancer Advocacy Network International Myeloma Foundation Leukemia & Lymphoma Society National Patient Advocate Foundation Nevada Affiliates of Susan G. Komen ® Nevada Oncology Society Ovarian Cancer National Alliance Society of Dermatology Physician Assistants Susan G. Komen ®	Not given	410-252-3457	mbuzby@myeloma.org
Erin Estey Hertzog	Biotechnology Industry Organization (BIO)	1201 Maryland Avenue SW Suite 900 Washington DC 20024	202-962-9200	ehertzog@bio.org
Tracey Woods	Anthem Blue Cross and Blue Shield	9133 W. Russell Road Las Vegas, NV 89148	Not given	Tracey.Woods@anthem.com
Tom McCoy	American Cancer Society Cancer Action Network	691 Sierra Rose Drive Suite A Reno, NV 89511	775-828-2206	Tom.mccoy@cancer.org
Lawrence LaMotte Emily Hovermale	Immune Deficiency Foundation (IDF)	40 West Chesapeake Avenue Suite 308 Towson, MD 21204	800-296-4433 443-632-2544	ehovermale@primaryimmune.org
Lisa Murdock	American Diabetes Association	168 Stonington Way Folsom, CA 95630	916-541-7198	lmurdock@diabetes.org

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
Lisa Swirsky	Consumers Union	1101 17th St., NW Suite 500 Washington, DC 20036	202-462-6262	lswirsky@consumer.org
Robert Greenwald Amy Killelea Andrea Weddle	HIV Health Care Access Working Group (HHCAWG)	Not given	Not given	rgreenwa@law.harvard.edu akillelea@nastad.org aweddle@idsociety.org
Mike Murphy	Nevada Association of Health Plans Members are as follows: Anthem Blue Cross and Blue Shield Nevada Health Plan Nevada Prominence Health	Not given	Not given	Tracey.Woods@amerigroup.com
Marissa Watkins (PhRMA) Rocky Finseth (Carrara)	Carrara Nevada on behalf of PhRMA	PhRMA 950 F Street, NW Suite 300 Washington, DC 20004 Carrara Nevada 2300 West Sahara Avenue Suite 800 Las Vegas, NV 89102	PhRMA 202-835-3400 Carrara Nevada 702-785-8026	rocky@carraranv.com
Linda Lott	National Multiple Sclerosis Society in Reno via Reno Gazette Journal	Not given	Not given	Not given

Name	Entity/Organization Represented	Business Address	Telephone No./ Business Telephone No.	E-Mail Address
April Alexander	Pharmaceutical Care Management Association	325 7th Street NW Ninth Floor Washington, DC 20004	202-756-5743	Not given
Karen Sartell	Nevada Patient Access Coalition Members as follows: Arthritis Foundation, Pacific Region American Academy of Pain Management Colors of Lupus Nevada National MS Society National Patient Advocate Foundation Power of Pain Foundation US Pain Foundation	Not given	702-371-5577	k.sartell@sncrf.org
Rev. Diane Drach-Mienel	Nevada Patient Access Coalition Member: Religious Alliance in Nevada	Not given	Not given	Not given
David Brewster on behalf of AAD	American Academy of Dermatology Association (AAD) and American Psychiatric Association	1445 New York Ave. NW Washington, D.C.	202-842-3555	dbrewster@aad.org
Adam Plain	Not given	Not given	Not given	Not given