



Nevada Psychiatric Association

2590 E. Russell Rd
Las Vegas, NV 89120
Office: 702.623.4319
Fax: 702.463.3943
www.nvpsychiatry.org

Assembly Committee on Commerce and Labor
Nevada State Legislature
401 S. Carson St.
Carson City, NV 89701

February 28, 2025

RE: Opposition to AB186 - Unintended negative consequences for patient care

Dear Chair Marzola and Members of the Committee,

The Nevada Psychiatric Association would like to express serious concerns for how the changes in AB186 may lead to unintended negative consequences for patient care, patient safety, and communication between healthcare providers. There are already existing processes by which pharmacists can contact physicians if they have concerns about a prescription or believe a patient would benefit from a new test or medication being ordered. If these communication processes are bypassed, there is the potential for patients to have conflicting assessments and plans between a patient's mental healthcare provider and pharmacist. Psychiatrists may not be aware of which tests have been ordered to be on the lookout for results, and proper use of test results as well as completion of plans of care could be disrupted if this communication process is bypassed.

Psychiatric diagnosis requires assessment of a person's experiences over time and impacts on their life. These are not captured by laboratory tests, and there is concern that the current language in the bill could potentially be interpreted as expanding the ability to diagnose mental health disorders to pharmacists based on laboratory tests and information in a patient's chart. This would fall below the standard of care, as mental health disorders cannot be diagnosed based on a laboratory test alone without a complete and up to date mental health evaluation. Pharmacies are not equipped in terms of building structure and communication practices to have pharmacists conduct a complete mental health evaluation.

There are also safety and standard of care concerns with the section allowing for pharmacists to prescribe medications based on existing diagnoses in a patient's chart. Psychiatric diagnoses, along with many other medical diagnoses, may change over time as a person's mental health changes. The current standard of care requires an updated mental health evaluation for the prescription of a new medication, and bypassing this standard could lead to treatment for conditions diagnosed in childhood or that have since been resolved. This would expose patients to unnecessary risks of side effects without the benefits of medication clearly outweighing the risks.

Sincerely,

A handwritten signature in black ink that reads 'Lesley Dickson' followed by a stylized flourish.

Lesley Dickson, MD
Nevada Psychiatric Association - State Legislative Representative