

March 16, 2015

The Honorable Representative Mitch Greenlick, Chair  
Honorable Members of the House Committee on Health Care  
Oregon State House of Representatives  
Salem, OR

RE: House Bill 2028 – Relating to pharmacy services

Dear Representative Greenlick and members of the House Committee on Health Care:

On behalf of the members of the National Association of Chain Drug Stores (NACDS) operating in Oregon, I would like to thank you for holding a hearing on House Bill 2026. The NACDS member companies in Oregon operate over 400 stores, employ over 58,000 full and part-time employees, and pay over \$52 million in state taxes.

NACDS support House Bill 2028 with several clarifying amendments.

Page 3, Section 3, subsection 29 (b): Strike: ~~“medication therapy management, comprehensive medication review and~~

Page 4, Section 3, subsection 30 (j) insert: Patient care services including medication therapy management and comprehensive medication review; renumber remaining subsections.

The provision of medication therapy management and comprehensive medication review are technically not clinical pharmacy practices, but should actually be included in the practice of pharmacy since they are related to the daily practice of pharmacy.

As defined by the Clinical Laboratory Improvement Amendments (CLIA), a CLIA-waived test is so simple there is minimal risk of error.<sup>1</sup> Community pharmacy-based point-of-care testing utilizes CLIA-waived tests that offer near immediate results in non-laboratory setting to support patient-centered health care.<sup>2</sup> Pharmacies increasingly offer this public health service to promote prevention, early detection, and disease management. Patients may seek such services if they experience acute symptoms associated with flu or strep throat, are at-risk for diseases such as HIV and hepatitis C,<sup>34</sup> or manage chronic conditions such as diabetes through use of the A1C test to measure blood glucose level. We urge you to consider the following:

Pharmacists are qualified and well trained to offer point-of-care services;  
Pharmacy-based point-of-care testing is done in collaboration with prescribers; and  
Screening at-risk individuals extends the reach of public health.

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<sup>1</sup> <https://www.cdc.gov/clia/Resources/WaivedTests/>

<sup>2</sup> <http://report.nih.gov/nihfactsheets/ViewFactSheet.aspx?csid=112>

<sup>3</sup> <http://www.cdc.gov/hiv/basics/testig.html>

<sup>4</sup> <http://www.cdc.gov/hepatitis/hev/guidelinesc.htm>

We appreciate your support of House Bill 2028 and consideration of our proposed amendment.

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