



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

March 54, 2019

The Honorable Senator Monnes-Anderson
Chair, Senate Committee on Health Care
Honorable Members of the Senate Committee on Health Care
Oregon State Capitol
Salem, OR

RE: Senate Bill 698 – Mandatory interpretive prescription labels

Senator Monnes-Anderson and Members of the Senate Committee on Health Care:

On behalf of the members of the National Association of Chain Drug Stores (NACDS) operating in the State of Oregon, I appreciate the opportunity to convey chain pharmacy's perspective on SB 698, legislation requiring pharmacists to provide language translation for the information on prescription labels. The members of NACDS operate 491 store fronts, employ over 51,000 full and part-time employees, and pay over \$39.6 million in state taxes.

Chain pharmacy is committed to meeting the needs of patients in the communities they serve. For generations, Americans have relied on community pharmacists and pharmacies to meet their healthcare needs. Pharmacists are trusted, highly accessible healthcare providers who are deeply committed to providing accurate prescriptions and helping patients take medications as prescribed.

Consistent with federal requirements applicable to healthcare organizations under 45 CFR 92.201 which direct healthcare providers to provide meaningful access to health care programs and activities for individuals with limited English proficiency (LEP), the pharmacy community works to ensure that LEP patients whom they serve are provided with the information needed to take their medications safely and as directed.

In working with our members, I have been made aware that our member pharmacies provide various types of special translation services to patients not proficient in English. In some areas where there are a large population of non-English speaking patients, pharmacies employ individuals speaking their patients' language(s). In other cases, pharmacies provide a call-in number where patients can receive prescription instructions in their native language and/or provide written instructions for use in some patients' native languages. Additionally, there are apps available where a pharmacist can communicate in English the instructions to the patient, which are then translated into the appropriate language. Pharmacies provide these services with their patients' best interests in mind and at their own expense – to ensure the health and safety of their patients.

We are concerned that the proposed requirements under SB 698 would impose new requirements that would go beyond what is practical and could potentially undermine the various ways that pharmacies already provide translation services to LEP patients.

Specifically, the requirement to affix a label to the prescription that is written both in English and patients' primary language would be highly problematic. Not only is the technology not readily available, this may impact the font size and the label's readability. Requiring pharmacies to provide language translation services for languages spoken by .2% or more of the Oregon population, in a particular location, is impractical. Pharmacies know best what is needed to be able to serve their local community and shouldn't have to prepare to translate languages they will rarely if ever see.

As pharmacies already employ various strategies to serve to LEP patients and the existence of federal standards in this area, we respectfully ask Oregon lawmakers to refrain from adopting the additional, unnecessary requirements set out under SB 698 and to instead allow pharmacies to continue to assess the needs of their patients and provide the services appropriate for their patients. Please oppose Senate Bill 698.

Sincerely,

A handwritten signature in black ink that reads "Lis Houchen". The signature is written in a cursive style with a vertical line to the left of the name.

Lis Houchen
lhouchen@nacds.org