

March 6, 2019

The Honorable Laurie Monnes Anderson, Chair
Senate Committee on Health Care
900 Court St. NE
Salem OR 97301

RE: SB 698

Dear Chair Monnes Anderson and members of the Senate Committee on Health Care:

Kaiser Permanente exists to provide high-quality, affordable health care services and to improve the health of our members and the communities we serve. That includes serving our non- and limited-English speaking members in their own language. Currently, Kaiser Permanente members have the option of having an interpreter on the phone when they are at the pharmacy. The pharmacist, the member, and the interpreter are all on the line at the same time. In practice, we see this option used infrequently because, due to our integrated health care delivery system, most members come to our in-house pharmacy directly from their in-person office visit accompanied by the interpreter who was with them during their office visit.

Kaiser Permanente fully agrees with the goal of Senate Bill 698 to ensure that patients can understand the instructions on prescription drug container labels, improve medication compliance and adherence, and reduce medication errors. We are concerned that the bill, in its current format, would cause significant administrative costs resulting from extensive system upgrades that we fear could not be done within the suggested timeline. We are especially concerned about:

1. the burden SB 698 places on the pharmacist to evaluate a patient's language skills to determine who requires translation services;
2. the requirement that the label be both in English and in the other needed language;
3. the number of languages that must be translated, which we believe would be 13; and
4. the proposed timeline for implementation. Three months is simply not enough time for significant systems changes.

Instead, Kaiser Permanente respectfully suggests consideration of a similar bill passed in California in 2015 (AB 1073) that we feel addresses the same issues in a manner that can be implemented more quickly and at a lower cost. This bill and the regulations that went into effect in 2016 require:

- translated directions for use of the medication must be made available upon the request of patient or the patient's representative;
- translated directions can be printed on the label or on a supplemental document;

- translation is required into certain languages as determined by rule by the Board of Pharmacy. (California currently requires translation into the top 5 languages);
- translation requirements are limited to a discrete set of statements (i.e. “Take 1 tablet by mouth every day”) as determined by the Board of Pharmacy; and
- the Board of Pharmacy makes translation of these statements available to pharmacists in the required languages.

We feel these modest changes to SB 698 would allow us to better meet the needs of non- and limited- English speaking Oregonians while balancing important implementation considerations. We also ask that there be more time given to make these changes so that we can ensure accuracy and consistency in the translations.

Thank you for your consideration of Kaiser Permanente’s concerns about SB 698. We look forward to working with the bill’s proponents on these issues.

Sincerely,



Amy Fauver
Director, Government and Community Relations
Kaiser Permanente Northwest