From: Vincent Chairez
To: PharmacyMeetings@DCA
Subject: Public Comment Regarding Changes to Section 1707.2 Duty to Consult
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Hello

My name is Vincent Chairez, CVS pharmacy technician and UFCW member.
Forgive me, I'm not sure if my comment is addressed in the meeting materials or where exactly to propose to amend or add for Section 1707.2 Duty to Consult. Maybe G4?

I do believe employers who ask their bilingual employees to translate DURs at the register/Consultation.
There has been a significant increase of clerks translating at the register and consultation because of the impending changes in the staffing ratio.
Currently my pharmacy has clerks outnumbering technicians and the majority of new clerks were specifically hired because they indicated they are bilingual.
Do the proposed regulations require employers to make sure the workers are properly trained to translate?
Also I believe when documenting consultations for patients' profiles who are already set to a preferred language besides English, the current system does not ask the pharmacists how they communicated to the patient?
Did they use a translation service?
Or the more than likely,
Did they use a clerk/technician?
Front store associate who doesn't work in the pharmacy?
Were any electronic devices used to clarify words like Google Translate? etc..
This job duty is very important to maintain accuracy for the patient's safety.
The new pick-up screens execute day CVS which requires more patient interaction with a screen that has shown that unfortunately a lot of non-English speakers cannot read in their native language.
This has led to an increase in new-hired clerks and technicians translating and/or explaining the vaccination questionnaires.

Secondly, support for the language of G9 despite what other employers may want.
The language proposed will benefit community chain pharmacies in enforcement and compliance.

Lastly, complete support that the pharmacy/pharmacist from where the prescription is being filled should be calling the patient.

Not in support of promoting any call centers or AI usage because patient's expect their local pharmacy/pharmacist to be calling them and this will just lead to more automation of that neighborhood pharmacy trust, which is already fading at the chain level.
AI should not replace or influence the judgement or practice of the pharmacist.