

**TO: Numi Lee Griffith, DCBS**

**FROM: Chloe Becker (OCAP), Maribeth Guarino (OSPIRG), and Rick Blackwell (PacificSource)**

**DATE: November 9<sup>th</sup>, 2021**

Thank you for the opportunity to provide feedback on the proposed temporary rules for SB 763 (2021) on behalf of the Oregon Coalition for Affordable Prescriptions (OCAP), OSPIRG, and PacificSource. Our organizations supported SB 763 in the 2021 session and look forward to the transparency and structure of this new licensing system. Our comments on the proposed temporary rules discussed in RAC 2 are below and we look forward to the continued discussion around these rules.

**836-200-XXX1: Definitions**

There was discussion during the second RAC meeting on the definition of “pharmaceutical representative”. The proposed definition mirrors language in statute and already clarifies that one must be *marketing or promoting* pharmaceutical products to health care providers. Therefore, we believe that it is unnecessary to explicitly exclude medical science liaisons, wholesale distributors, or managers/supervisors in the definition.

**836-200-XXX4: Education and Continuing Education Requirements**

We support the current proposal for completion of 15 hours of education (10 pre-licensure and 5 for continuing education). The City of Chicago currently has over 200 hours of approved continuing education courses, providing a variety of options for pharmaceutical sales representatives to complete their requirements. These hour requirements do not seem out of line with other licensing programs: The Department’s producer licensing program requires 20 hours of pre-license training and 24 hours of continuing education for license renewals every other year.