



Department of Consumer and Business Services
Karen Winkel
Division of Financial Regulation
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Salem, OR 97309-0405
Email: DFR.Rules@oregon.gov; karen.j.winkel@dcbs.oregon.gov

Submitted via email



May 25, 2022

RE: Comments on Draft Rule and Template (OAR 836-200-0600 to 836-200-0670)

Dear Ms. Winkel,

Sanofi is an innovative global healthcare company, driven by one purpose: to chase the miracles of science to improve people's lives. Our team, across some 100 countries, is dedicated to transforming the practice of medicine by working to turn the impossible into the possible. We provide potentially life-changing treatment options and life-saving vaccine protection to millions of people globally, while putting sustainability and social responsibility at the center of our ambitions.

Sanofi concurs with the comments of our trade association, PhRMA. In addition, there is a technical consideration we would like to bring to your attention. Proposed OAR 836-200-0620 states the requirement that pharmaceutical representatives list the products they are "promoting" and give a value for samples. In the template developed by the department to implement this provision, this requirement is carried through in a series of boxes with space for the value of samples for products "promoted or marketed". However, Sanofi pharmaceutical representatives do not provide samples for every product that they may discuss. The template does not allow for a "0" or "no sample" to be placed next to a product that has been disclosed as being "promoted or marketed". If such a value is entered, a message pops up that "if there is a drug listed in the preceding column, then this field is required and cannot be left blank". Therefore, it is impossible to fill in the template accurately in the case of a pharmaceutical representative "promoting or marketing" a product by discussing it with a health care professional but not leaving a sample behind. We would respectfully ask that the template be corrected to allow for the situation described above.



Thank you for your consideration. If you have any questions, please reach out to Michelle Jastrzebski at US.StateReportingOps@sanofi.com or to me, Deanne.Calvert@sanofi.com

Sincerely,

Deanne C. Calvert

Deanne C. Calvert
Head, State Government Relations
Sanofi US