

From: [Vincent Chairez](#)
To: McFall, Julie@DCA
Subject: Public Comment for November 5-6th Full Board Meeting
Date: Saturday, October 25, 2025 6:15:37 PM

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Dear Members of the California State Board of Pharmacy,

My name is Vincent Chairez. I am a pharmacy technician at a 24-hour CVS located near a county hospital, and I proudly serve as a union steward with UFCW Local 324.

I am writing to respectfully request that the Board consider creating regulations requiring worker standardized and accountable translation services in pharmacy settings—particularly by major employers like CVS. The need for certified bilingual staff is critical to ensuring safe and equitable care for patients with Limited English Proficiency (LEP).

While I do not speak a second language, I work alongside coworkers who do—particularly Tagalog and Spanish—and their skills are essential to daily operations and patient care in our diverse community. We often serve patients late at night and during high-pressure situations where access to accurate in-person communication is crucial. This is not just a helpful skill—it is a patient safety issue.

Despite this, retail employers currently offer no consistent standards, training, or certification for staff providing translation. CVS does require employees to identify their language skills on name badges, which misleads patients into believing they are certified to interpret pharmacist consultations and DURs. Meanwhile, CVS' own policy (Module #800699, Providing Equal Access to Healthcare) says patients should not rely on “unqualified staff”—but provides no mechanisms for accountability or training.

There are possible solutions. A Spanish-language pharmacy course is available from the California Pharmacists Association, but it is not well-promoted.

<https://cpha.com/ce-events/on-demand-courses/spanish-in-the-pharmacy-what-you-need-to-know/>

CVS offers a Capella education program, but has an unaffordable upfront cost for the worker and therefore inaccessible to most employees. Local county hospitals and Kaiser already offer voluntary certification for bilingual interpretation—retail pharmacies can and should do the same, especially when language barriers can result in life-threatening medication errors. Kaiser goes as far and dictates that if their employees do not pass their bilingual terminology course, then the worker cannot translate medical consultations and DURs.

Referring back to the Module #800699, highlighting that CVS acknowledges that “colleagues like you are best able to access the needs of the patient and customers”.

Here is a study supporting in-person interpretation over remote methods, reinforcing the value of certified, on-site language access in pharmacy settings:

<https://pmc.ncbi.nlm.nih.gov/articles/PMC12060873/>

CVS workers represented by UFCW Local 324 are ready to support the Board in developing accessible, affordable certification programs—just as we’ve successfully partnered with the CPhA through the vaccination certification program supported by state workforce grants. With similar collaboration, we can raise standards, improve outcomes, and protect both patients and workers.

If met with resistance, I encourage the Board to coordinate with the Department of Justice or the Office for Civil Rights under HHS, which investigates language access violations in healthcare under Title VI of the Civil Rights Act.

Thank you for your attention to this important issue. I look forward to your leadership in promoting equitable and safe pharmacy care for all Californians.

Sincerely,

Vincent Chairez

Pharmacy Technician, CVS

Union Steward, UFCW Local 324