

Respondent	Other (please specify)	Company/Organization	Response	Open-Ended Response
Pharmacist		Miami Valley, chapter of the national Federation of the blind	Interested Party	I am visually impaired in need of support, indoor help with prescriptions, and all that that entails possible
Other (please specify)	no Job		Interested Party	I am a blind person and I would like to have my medications accessible to me. I don't want to depend on others for my medicines.
Prescriber			Interested Party	I think this is a great idea and would be immensely helpful.
Other (please specify)	Blind consumer		Interested Party	I believe this would be very helpful to many people in regards to their prescriptions.
Prescriber		n/a	Interested Party	this would be great for everyone so they can see who is provide services.
Other (please specify)	Patient		Interested Party	Raymond uses the device to help learn medication milligram strength to stay aware of the medications that he consume.
Other (please specify)	Patient		Interested Party	
Other (please specify)	I am a blind person that uses accessable medacin labels.		Interested Party	I think everyone need to know what the label of a medicine says. Even if it's knowing what pharmacy has accessible labels.
Other (please specify)	Patient		Interested Party	
Other (please specify)	Patient of Pharmacy		Interested Party	I think this would be a very good thing and will allow patience like me to be able to have a place to go to see if there Pharmacy that they would like to use has the required things to make sure that our medication's are Accessible Furthermore, I think it would be cool. Also, if they told whether or not, their apps were accessible to people with disabilities, especially people with visual impairments.
Organization		Center Street Community Health Center	Interested Party	We provide audio-visual internet translation services, including translation of sign language at our retail pharmacy.
Other (please specify)	Chief medical Officer	Center Street Community Clinic. Inc.	Interested Party	
Other (please specify)	Fire Department	Warren Township Fire Department	Interested Party	
Pharmacist		Neighborhood Family Practice	Interested Party	I think the thought behind this is good but I think it should be optional. The landscape of staffing and support right now is constantly changing and this seems like a great idea in theory but

				could be cumbersome for pharmacies to keep up with at this time. I think optional would give you the best of both worlds.
Pharmacist		UC Health	Opponent	
Organization		Hope recovery community	Opponent	These are citizens with disabilities!!! Pharmacies need to provide the services they need
Prescriber			Opponent	
Pharmacist			Opponent	Places stress on staff to provide additional services. Services may be available depending on staffing and that could be kept updated from day to day scheduling on the website list
Pharmacist			Opponent	
Pharmacist			Opponent	
Organization			Proponent	Please make prescriptions accessible to people with low Vision.
Organization		NFB	Proponent	As an individual who is losing their vision, I am finding it mote difficult to see the info on my prescription. Accessible pharmacy services would be a wonderful life help. I never thought this would ever happen, BUT...Life comes at you fast! Thank you
Pharmacy		Embrace Healthcare	Proponent	
Other (please specify)	deaf blind patient		Proponent	Having a proper prescription labeler would benefit me as a hearing & blind patient who also is a caregiver for both my mom and brother.
Other (please specify)	Blind patient		Proponent	I would like to see this pass so I have proper information on my medications, just I would if I was sighted.
Other (please specify)	Family member		Proponent	I am a child of a veteran who recently passed away from several medical conditions and a caregiver. I am also blind and rely on Braille, assistive technology, and other alternative techniques to function in daily life. My father had cognitive limitations and was unable to manage his medications, and I ultimately had to advocate with his social worker through the comprehensive Caregiver Support Program at the VA for his medications to be labeled accessibly with labels from Envision America, which offers accessible medication labels. I was originally told that only blind veterans were eligible to receive accessible medications and not caregivers, and I had to explain that the VA had a contract with Envision America to provide such labels (and what these labels were and why I needed my father's medications to have them). This is knowledge that most people do not have, and few local pharmacies are able to produce accessible medication labels, requiring me to find a pharmacy that does or rely on others to identify my medication bottles. This can be very dangerous in many cases, as you can well imagine.. Compiling a statewide direcgtory of

				pharmacies offering accessible medication labels is a necessity for Blind and visually impaired patients.
Other (please specify)	Blind patient	Retired	Proponent	I am blind and I take several medications per day. I have all of my medications with a Braille label and a UPC sticker on the bottom so I can use a medication reader so my medications are accessible to me. This increases my confidence that I am taking my medications at the right time, in the right amount and know the possible side effects to be aware of. I can do this for my mail order prescriptions but if I go to the doctor and receive a new prescription I have no way to know what it is, how to take it or what side effects it may cause without sighted assistance. I don't want to share my medical conditions with other people. I should have the same right to privacy other people have. Please support this bill so I am aware of what pharmacies in my area can provide me with a way to audibly identify my medications.
Organization		National Federation of the Blind of Ohio	Proponent	I am totally blind and have been taking drugs for several years and at one time it was possible to have some way to know what the difference was in medicine or the bottles. What I find now is that most medicines are similar in size and the bottles also seem to be made by the same provider and this makes the ability to determine what medication is the correct one to take impossible. Each time that I go to get my medication they provide me with a few pages of paperwork and the label has warnings and directions which are not accessible to me. I think that blind people should have the ability to determine the type of medication and be able to read the warning on the labels. I am in favor of the rule and law requiring accessible labels.
Other (please specify)	patient who takes medication	NFB of Ohio	Proponent	I am for this I am totally blind and prescriptions that are accessible for me are very important. Without accessibility I would not know if I am taking the correct medication. A lot of us live alone and do not have sighted assistance, this also will make me more independent the way that it should.
Prescriber		N/A	Proponent	Just one thing to help level the field for all.
Other (please specify)	Patient		Proponent	All pharmacies should offer accessible prescription labels in some form, whether that be braille or audio. Insisting that a person with a disability rely on others is absolutely absurd and shall not be tolerated.
Other (please specify)	Patient		Proponent	
Other (please specify)	Patient		Proponent	I am visually impaired. This service allows me to independently monitor my medication. This is not possible otherwise.

Organization		National Federation of the Blind of Ohio	Proponent	I am in strong support for accessible prescription labeling for disabled populations.
Pharmacy Technician		National Federation of the blind	Proponent	Good afternoon I believe that prescription drug labels should be accessible for the blind and Visually impaired.
Organization		National Federation Of The Blind Of Ohio	Proponent	As a blind organization, this passing would be a life changer for people who are blind and print disabled. The ability to understand dosage, warnings, allergies, and more will help blind people and other disabilities safely take and administer medication's to families. Please pass this important Regulation.
Other (please specify)	Low vision		Proponent	With macular degeneration I am fast losing my ability to read. I am forever in search of solutions to assist me in being able to retain my independence.
Organization			Proponent	It would be wonderful to be able to handle my prescriptions on my own. I don't always have someone available to tell me what I'm taking so sometimes I can't take my medicine from fear of taking the wrong thing.U
Other (please specify)	individual	none	Proponent	I'm part of the visual impaired population. Having this service would be a tremendous benifit.
Other (please specify)	Consumer		Proponent	Good afternoon. As a consumer who is both legally blind and has moderate-severe hearing loss, I definitely support the proposal for a directory of accessible services. This information, particularly if put online, would make it much easier for consumers to find accessible pharmacy services. However, I am extremely disappointed that this is all the Pharmacy Board is willing to go forward with at this point. This rule goes nowhere near far enough to protect the health and lives of people with disabilities, particularly those who are blind and visually impaired. Many prescription medications have some serious side effects and require that they be taken in a particular way so that they work properly to treat the condition for which they are prescribed. For most people, this information can be accessed independently by simply sitting down and reading the label and the accompanying warning information. But this information is completely inaccessible to a blind/visually impaired information. But there is a way via inexpensive labeling devices that create an audio label that is simply stuck to the bottom of a prescription bottle that will allow blind and visually impaired people to access this information via an audio file that they can listen to with a specialized reader or a smartphone app. Providing this information is so inexpensive that many small mom-and-pop pharmacies elect to do this voluntarily. Yet, the vast majority of pharmacies in Ohio, despite the effective

				<p>communications requirements of the Americans with Disabilities Act, still do not make this information available. The directory of accessible services that would be created under the current proposal will benefit consumers in that if their local pharmacy does not provide accessible services, they may be able to locate another one that does. I say may because the reality is there are communities that simply do not have any pharmacy that provides accessible services because providing this service is not a requirement under Ohio law. Take for example a small town such as my hometown of West Jefferson Ohio where there are around 5,000 residents. In many of these types of towns, there is only 1 pharmacy available, and usually, that pharmacy does not provide any accessible labeling services. In these cases, the nearest accessible pharmacy might be 15, 20, or even 30+ miles away. This puts a blind/visually impaired individual in the difficult position of having to either go without being able to independently access their prescription information or having to try and find transportation to travel a long distance to get their medications. They may even have to do so while being sick if this is for a transient event such as the flu, COVID-19, etc. The question then becomes what is the potential consequence of a blind/visually impaired individual not having independent access to their prescription information? Because many pills, capsules, and even prescription bottles are the same in size and shape, blind/visually impaired individuals have taken the wrong medications and have even given the wrong medications to their children simply because they thought they had the correct medication in hand but did not. Or another possibility is that a blind/visually impaired person might take the wrong dosage of a medication because they were unable to read the correct dosage of the medication. There are many other possible scenarios such as taking multiple medications simultaneously when they should only be taken individually, etc. The end result of these scenarios is that an individual's condition might not be treated properly, the individual might have severe medication side effects that could result in serious illness/injury, and an individual could even suffer an accidental overdose or side effect that results in death. Consequently, I call on the pharmacy board to pass the current proposed rule only as an interim step to provide valuable information to the public. However, I also call on the Pharmacy Board to take swift action to protect the health, safety, and lives of blind/visually impaired patients by requiring every pharmacy in the State of Ohio to provide accessible</p>
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				prescription labeling when requested. Respectfully submitted, Warren Todd Elzey
Other (please specify)	customer		Proponent	The rule is an improvement, but the optimum situation would be for everyone to be able to go to their local pharmacy and have accessible products available to them.
Prescriber			Proponent	
Other (please specify)	consumer		Proponent	
Other (please specify)	Patient		Proponent	People with vision limitations would benefit greatly It's something that's needed for everyone.
Other (please specify)	Consumer	Individual	Proponent	Creating a catalog of pharmacies with accessible prescriptions goes a long way to helping the population of this state with a disability maintain good health. Mandating pharmacies to keep a list of accessible pharmacies allows for informed consumer choice. For everyone.
Other (please specify)	Visually impaired		Proponent	I am visually impaired, and the script reader is very helpful and useful to me
Prescriber			Proponent	I am totally blind and the use of this information would help me greatly so that I can be the most independent as possible when picking up and consuming my medication's at home by myself.
Prescriber		N/A	Proponent	
Other (please specify)	patient	American Council of the Blind	Proponent	Prescription label readers such as Scriptalk which allow a mobile device or external reader to read a tag with code containing a patient's personal prescription information is essential for us to safely take our medication and remain as independent as possible without sighted assistance. If we care for a child, pet, service animal, or adult who takes medication, we can hear their prescription labels spoken aloud using Family Sharing in order to assist them. Scriptalk can also store past history of medications so visually impaired patients, companions, and caregivers can review what meds we have taken, possible interactions, and show our doctors. Scriptalk and similar prescription label readers which allow scanning with smart phone apps lessen possibility of dosing mistakes, confusion, unsafe ingestion of medication, and give the blind patient privacy allowing us to take medication independently.
Other (please specify)	Medical Interpreter		Proponent	
Other (please specify)	Script talk user		Proponent	
Other (please specify)	patient		Proponent	

Other (please specify)	I'm in favor.	American Council of the Blind Diabetics In Action	Proponent	Making prescriptions fully accessible to all is a must and a life-saving requirement. Being able to independently manage one's prescriptions independently will avoid dosage errors, mixing-up prescriptions which could make someone very sick or kill them. As I live with blindness, access to ScripTalk from Envision America has enhanced my life tremendously as I can, completely independently, oversee and manage the multiple RX's I take on a daily basis. Thank you and plz contact me with any questions. 847.846.8375
Other (please specify)	Script Talk user		Proponent	Script Talk is an important tool for those with no vision or low vision to access information about their medication and dosage. This is a valuable tool that every Pharmacy should take part in.
Pharmacist			Proponent	
Other (please specify)	blind individual		Proponent	As someone who is blind, this would be a great thing. As it is right now currently, the only resource I know of to allow me to find out which pharmacies have Script Talk is the Script Talk website. Also, I think there should be contact information made available for each pharmacy so that if one has questions or wishes to possibly have the pharmacy implement services, that would be a great help. For example. Many Kroger pharmacies already offer Script Talk. The one I use did not, but after contacting Script Talk and searching around for the information for the Kroger pharmacy I use, I was able to have them begin offering Script Talk at that location.
Other (please specify)	Low low vision patient		Proponent	As a senior citizen who has a low vision problem and can no longer read the labels on prescription bottles, the script reader is a lifesaver for me
Other (please specify)	daughter of a user of the scripps talking machine for medication		Proponent	
Other (please specify)	Person who is totally blind	NFB	Proponent	Such a rule is long overdue
Other (please specify)	scripptalk user		Proponent	This service is mandatory for Disabled persons it is a safety measure that helps / protects Disabled persons.
Other (please specify)	Patient		Proponent	I am all for making our lives as easy as possible
Prescriber		Retired	Proponent	
Other (please specify)	User		Proponent	
Other (please specify)	Individual	Na	Proponent	
Pharmacy			Proponent	

Pharmacist			Proponent	This would be amazing for everyone
Other (please specify)	RN		Proponent	All pharmacies must provide accessible labels to all patients.
Other (please specify)	Caretaker		Proponent	Create the rule that ALL Pharmacies must provide accessible labels to patients, and all other medical and conveniences for handicapped and/or elderly individuals.
Pharmacist		Holzer Specialty Pharmacy	Proponent	1. Translation services for patients with limited English proficiency. - YES 2. Services for patients who are hard of hearing. - YES 3. Services, such as prescription readers, for patients with low vision. - NO
Pharmacist		Marietta Memorial Specialty Pharmacy	Proponent	1. Translation services for patients with limited English proficiency - YES 2. Services for patients who are hard of hearing - YES 3. Services, such as prescription readers, for patients with low vision - NO
Pharmacist		Community Health and Wellness Partners	Proponent	
Pharmacist		WHOLESOME HEALTH PHARMACY	Proponent	currently we do not offer any of those services.
Organization		Community Nursing Home	Proponent	
Pharmacist			Proponent	
Pharmacist			Proponent	I like the idea, but how will patients access this information? Particularly if they are struggling with access to information in an accessible format, how will they know this exists and where to find it? Will physician offices be made aware so they can direct patients appropriately?



OHIO COUNCIL OF
RETAIL
MERCHANTS

November 2, 2023

Steven Schierholt, Executive Director
Ohio Board of Pharmacy
77 South High Street, 17th Floor
Columbus, OH 43215

Mr. Schierholt,

On behalf of the chain drug members of the Ohio Council of Retail Merchants, thank you for the opportunity to comment on proposed new 4729:5-2-05, Notification of Accessible Services.

We applaud pharmacies that are providing accessible services to patients who require individualized assistance with their prescriptions. There have been many technological advancements in this area, enabling pharmacies to better serve their patients with these special needs. We would, however, like to request some qualifying language.

The requirements of both proposed (C) and (D) would become subject to disciplinary action for failure to comply, yet neither provide for exceptions such as equipment or software failures that cannot be fixed or replaced in a timely fashion, or vendors that discontinue their services and attempts to contract with an alternative vendor take more than 30 days. I'm sure there are other reasonable exceptions that exist and possibly some all-inclusive language could be added to cover them all, maybe with the caveat being that the Board may determine what is and what isn't "reasonable." You may, however, find it more feasible to create a list of exceptions, the last being anything else the Board determines is reasonable.

Once again, thank you for this opportunity. Please let me know if you have any questions or wish to engage this subject further.

Sincerely,

Lora Miller
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November 2, 2023

Steven Schierhold, Esq.
Executive Director
Ohio State Board of Pharmacy 77
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Columbus, OH 43215

Re: Request for comments – Re: OHA Comments on Proposed Rule Accessible Pharmacy Services

Dear Director Schierhold,

On behalf of The Ohio State University Wexner Medical Center (OSUWMC), we appreciate the opportunity to provide feedback on your recent request for public comments on Accessible Pharmacy Services. We would first like to express gratitude to the Board of Pharmacy for working to ensure that our patients with disabilities are protected from discrimination. **However, the newly proposed rules create additional requirements that is currently governed by The Americans with Disabilities Act (ADA).**

The Ohio State University Wexner Medical Center (OSUWMC) is an academic medical center that provides over 1.9 million outpatient visits, over 60,000 patient admissions, and over 130,000 emergency department visits each year. OSUWMC recognizes the importance of the pharmacist as a member of the healthcare team and utilizes the expertise of the pharmacist in a variety of patient care settings across OSUWMC, including, but not limited to, ambulatory, acute care, and community.

The ADA, enacted in 1990, is a federal civil rights law that prohibits discrimination against individuals with disabilities in five areas: communication, employment, government activities, public accommodation, and transportation. For purposes of this act, pharmacies are classified as places of public accommodation, therefore, subject to the legal requirements outlined within the law. To avoid duplicity, increased confusion, and potential contradiction, we urge the Ohio State Board of Pharmacy to reference this national legislation, rather than setting state-specific standards for pharmacy accommodations.

OSUWMC supports the efforts to minimize discrimination against those with disabilities, and **strongly recommends utilization of national legislation as outlined by The ADA surrounding pharmacy accommodation requirements in the state of Ohio** and eliminate the addition of administrative burden.

Sincerely,



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