

Aprd comments

The Blinded Veterans Association (BVA)

477 H. Street NW

Washington DC 20001

COMMENTS

Document No. 2004N-0221

The Medicare Prescription Drug Improvement & Modernization Act of 2003

Study On Making Pharmaceutical Information Accessible for the Blind and Visually-Impaired

The Blinded Veterans Association (BVA) appreciates the opportunity to submit comments on the proposed study required by the Medicare Prescription Drug Improvement & Modernization Act of 2003. BVA is the only Congressionally Chartered Veterans Service Organization exclusively dedicated to assisting America's blinded veterans and their families. Founded in 1945, BVA received its Charter from Congress in 1958. The Charter designates BVA as the organizational advocate to represent all blinded veterans before the Executive and Legislative branches of Government.

BVA in addition to being a membership organization, also provides direct services to any blinded veteran regardless of membership status.

For a number of years, the membership of BVA through the adoption of resolutions has supported the need for pharmaceutical products to be made accessible for visually-impaired and blinded veterans.

In response to BVA's resolutions, the Department of Veteran's Affairs (VA) has undertaken to make such products accessible. Within the VA's Veterans Health Administration (VHA) Prosthetics & Sensory Aids (PSAS) Strategic healthcare Group (SHG) a national initiative to achieve this objective has been underway for nearly one year. The Prosthetic Clinical Management Program has appointed a Work Group composed of clinicians and consumers to develop Clinical Practice Recommendations for the provision of Audible Prescription Reading Devices (APRD) in addition to developing specifications for such devices in an effort to obtain a National Contract for the preferred device.

This process is near completion and concurrences are being sought from all clinical elements of VHA before the Under Secretary for Health signs off on the CPR's.

BVA feels very strongly that the Food & Drug Administration should pursue the question of making pharmaceutical products accessible as quickly as possible. Given the work already done by VA on this important issue, BVA recommends the FDA consult with VA regarding the results of VA's work. VA is recognized as a leader in the medical field in terms of initiatives regarding Safety as it pertains to administration of medications. VA and blinded veterans clearly recognize the importance of minimizing risk and preventing medication errors that could result in serious medical complications and possibly death. Accessibility for the visually-impaired and blind is especially important given the fact the vast majority of visually-impaired and blind are over sixty-five years of age and generally have multiple medical problems being treated with a variety of medications. It is well

documented that age is the single best predictor of visual-impairment and blindness. It is also well known that memory and some cognitive problems are also associated with aging. It is extremely important the people who are visually-impaired or blind and live alone are at risk for medication errors when they do not have access to the information contained on the medication containers. Many of our more elderly blinded veterans have spouses who are also medically compromised and not always available to remind or read labels for the veteran.

The VA estimates there currently are one hundred thirty thousand legally blind veterans and this number will increase to nearly one hundred and forty thousand by 2009. The number will remain fairly constant after that. Visually-Impaired and blinded veterans are only a microcosm of the total population. All blind American's should benefit from advances pioneered and made by VA.

VA has learned there are a number of pharmaceutical products that are accessible on the market today. Clearly it is feasible and advisable for FDA to require accessibility for the visually-impaired and blind if adverse medication errors are to be prevented. The cost to make pharmaceutical products accessible is far less than treating the results of medication errors.

BVA looks forward to the results of FDA's study and trust they will agree with VA and its findings on this critical issue.

BVA appreciates this opportunity to submit comments on the proposed FDA study and if we can provide any additional information we can be reached at  
(202) 371-8880

Respectfully,  
Thomas H. miller  
Executive Director  
Blinded Veterans Association