

100 Daingerfield Road, Suite 100
Alexandria, VA 22314

www.a4pc.org



December 6, 2024

Deena Speights-Napata, M.A.
Executive Director
Maryland Board of Pharmacy
4201 Patterson Ave.
Baltimore MD, 21215

Dear Executive Director Speights-Napata and Members of the Board of Pharmacy:

On behalf of the Alliance for Pharmacy Compounding, I am writing to provide comments regarding the proposed regulation on prescription labeling for blind, visually impaired, or otherwise print-disabled individuals.

We wholeheartedly support the principle of ensuring equitable access to prescription information for individuals with disabilities. Accessible labeling, bag tags, and medical guides, including audio formats, are essential for patient safety and empowerment. However, we are concerned about the proposed mandate that pharmacies provide these services “at no additional cost.”

While APC fully supports the requirement to offer accessible labeling options, we believe the financial implications of this regulation have not been adequately considered. Many pharmacies, particularly small businesses, face significant challenges in absorbing the costs associated with providing these services without additional reimbursement. To our knowledge, no financial impact study has been conducted to evaluate the burden this would place on pharmacies, nor is there precedent for requiring businesses to deliver such additional services at no cost.

We respectfully urge the Board to amend the regulation to allow pharmacies to recover the costs of providing these essential services. This approach would balance the important goal of accessibility with the operational realities faced by pharmacies, ensuring sustainable implementation of the regulation without risking a reduction in pharmacy access for all patients.

Thank you for considering our perspective on this important matter. Should you have any questions, please do not hesitate to contact me at scott@a4pc.org.

Best,



Scott Brunner, CAE
Chief Executive Officer

The Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 500 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers.