



February 10, 2025

Joshua Munroe  
Rules and Legislative Consultant  
Washington Pharmacy Quality Assurance Commission  
PO Box 47852  
Olympia, WA 98504

Dear Mr. Munroe and Members of the Washington Pharmacy Quality Assurance Commission:

On behalf of the Alliance for Pharmacy Compounding, I am writing to provide comments regarding the rules adoption package (CR-103P) under WSR-25-04-003, specifically rule WAC 246-945-028 Accessibility of Prescription Information for Visually Impaired or 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.

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 request that the Washington State Department of Health clarify how the additional costs of implementing accessible labeling will be covered. This could include exploring options such as reimbursement mechanisms, grants, or other financial support to ensure that pharmacies can sustainably provide these essential services without compromising their ability to serve all patients. 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](mailto:scott@a4pc.org).

Best,

A handwritten signature in black ink, appearing to read 'S. Brunner', with a stylized, cursive script.

Scott Brunner, CAE  
Chief Executive Officer

*The Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 600 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers.*