

January 18, 2022

Dr. Marcella Nunez-Smith
Chair
COVID-19 Health Equity Task Force

Dear Dr. Marcella Nunez-Smith:

The National Disability Rights Network (NDRN) writes to express our concern for the Americans who will lack full access to President Biden's roll-out of free at-home rapid COVID-19 tests. NDRN calls on the president to provide alternative options for persons who cannot use the traditional at-home rapid COVID-19 tests.

On January 19, 2022, all Americans can request via phone or an online form the delivery of four free COVID-19 tests. NDRN applauds the Administration for this important step in helping all persons remain safe from contracting and spreading the virus. However, at this time, many Americans with disabilities cannot administer the test and read the results independently. This presents a difficult position for many people with disabilities; they are left out of this important step in combating the pandemic.

NDRN is the non-profit membership association of Protection and Advocacy (P&A) agencies that are located in all 50 States, the District of Columbia, Puerto Rico, and the United States Territories. In addition, there is a P&A affiliated with the Native American Consortium which includes the Hopi, Navajo and San Juan Southern Paiute Nations in the Four Corners region of the Southwest. P&A agencies are authorized under various federal statutes to provide legal representation and related advocacy

services, and to investigate abuse and neglect of individuals with disabilities in a variety of settings. The P&A Network comprises the nation's largest provider of legally based advocacy services for persons with disabilities.

First, the procedure to administer the at-home rapid COVID-19 test requires a certain level of dexterity. As a result, some persons with physical disabilities cannot independently use the at-home test. Therefore, the test requires the physical presence of another individual; this in turn makes the other person at risk of contracting the disease if the person taking the test is showing symptoms.

Second, individuals who are blind or visually impaired cannot administer and read the results independently. Blind test users have explained that following the complicated steps without visual instruction is exceedingly difficult. And most significantly, the test notifies a user of their results by showing a color; this is not usable for blind or visually impaired users.

NDRN encourages the Administration to do two things. First, and most immediate, persons with disabilities should have access to a different but equally easily available way to get tested. For instance, mobile test providers should be available by request to travel to the homes of persons with disabilities to administer the tests. Most people with disabilities do not drive; they use public transit or other options. However, if a person believes they are symptomatic, they should not use a public bus where they could spread the disease. Consequently, the tester should go directly to the residence of the person. Those traveling to administer the tests will be trained medical professionals equipped with personal protective equipment. This will prevent the potential spread of the disease.

Second, the Administration should urge pharmaceutical companies to design new at-home rapid COVID-19 tests to administer the test in a more user-friendly way that is accessible for people with disabilities. The deliverance of the results should also be more than just a change in color. For instance, in the United Kingdom, the Royal National Institute of Blind People developed a prototype of an accessible pregnancy test where the test provided a tactile response so blind users knew the result of the test. The Administration should urge pharmaceutical companies to begin developing new technology such as this.

Thank you for listening to our concerns. We urge you to consider our suggestions to make sure that all Americans have an accessible and safe way to test for the virus. If you have any questions, please reach out to Claire Stanley at Claire.stanley@ndrn.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Curtis L. Decker", is displayed within a light gray rectangular box.

Curtis L. Decker
Executive Director