



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

January 21, 2022
Via electronic mail

Dear Ms. Knackstedt,

The Emergency Management Task Force (EMTF) of the Consortium for Citizens with Disabilities 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. The EMTF calls on the president to provide alternative options for persons who cannot use the traditional at-home rapid COVID-19 tests.

As of January 19, 2022, all Americans could request via phone or an online form the delivery of four free COVID-19 tests. We applaud 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.

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. The same need for personal assistance may be necessary for some individuals with intellectual or developmental disabilities; this community may need assistance walking through the instructions. Different communities need different forms of instructions, such as pictures or instructions in plain language.

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.

The EMTF encourages the Administration to do two things. First, and most immediate, persons with disabilities have the right to reasonable modifications to services in efforts to facilitate and achieve equity in the roll-out of the at-home tests. For instance, mobile test providers should be available by request to travel to the homes of persons with disabilities to administer the tests. Many 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 to the residence or other requested venue 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.

Third, the Administration must remember its obligation to provide accessible services as a program that receives federal funding; legally, the Administration must take steps to make these tests accessible for all users. The Administration should also 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. Instructions to use the test should be provided in a myriad of ways to accommodate people with different disabilities. For instance, instructions should be depicted in pictures, written in plain language, and performed on videos that can easily be found online. 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.

On January 20, 2022, Emily Voorde with the Whitehouse Office of Public Engagement during a Disability Stakeholder call announced that the Administration has called on the National Institutes of Health (NIH) to develop accessible at-home tests. The EMTF looks forward to seeing what NIH develops and will wait eagerly for the roll-out of such tests.

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,

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The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society free from racism, ableism, sexism, and xenophobia, as well as LGBTQ+ based discrimination and religious intolerance