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March 13, 2025

The Honorable Susan R. Donovan, Chair
House Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: H 5858 – An Act Relating to Health and Safety – Maternal and Child Health Services for Children with Special Health Care Needs

Dear Chair Donovan:

Please accept this letter of conceptual support, with amendments, for H 5858, legislation that would establish the scope of a certified professional midwife's authority relating to prescribing medication to patients. This act would take effect upon passage.

The Rhode Island Department of Health (RIDOH) is working on amendments to H 5858 which would include and define certified professional midwives (CPMs) as they do not currently exist in R.I. Gen. Laws Section 23-13-9. This change will allow CPMs to prescribe in accordance with the national certifying body, the North American Registry of Midwives (NARM), and as authorized by the Director of RIDOH. We propose removing the list of 51 medications included in H 5858 and including authority for the Director to authorize CPMs to prescribe certain medications in alignment with the NARM standards. RIDOH would then amend section 23.10 (D) in RIDOH's existing *Rules and Regulations for Midwives* ([216-RICR-40-05-23](#)) to authorize CPMs to prescribe, carry, and administer the 11 NARM medications.

Codifying standards of care into statute is problematic because clinical guidelines are rapidly outmoded due to new and changing research and practice. Including a specific prescriptive list of medications in statute may very well lead to unintended consequences as medication protocols evolve and change over time. Put another way, attempts to draft legislation prescriptively can result in simultaneously under-inclusive and over-inclusive rules. Including the medications in RIDOH's regulations will allow for maximum flexibility to update medication administration protocols.

RIDOH looks forward to working with the sponsors of H 5858 on amendments that would ensure that CPMs are trained appropriately on the medications provided to their patients. RIDOH will share proposed amendments with the sponsors and members of the Committee soon. Thank you for the opportunity to comment on this important legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is fluid and cursive.

Jerome M. Larkin, MD
Director

CC: The Honorable Jennifer Stewart
The Honorable Members of the House Committee on Health and Human Services
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy