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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 6037 – An Act Relating to Businesses and Professions – Pharmacies**

Dear Chair Donovan:

Please accept this letter of concerns regarding H 6037, legislation that would amend the definition of the "practice of pharmacy" to include the administration of immunizations vaccines for persons three years of age and older. The Act would take effect upon passage.

Between February 4, 2020, and May 11, 2023, the federal Public Readiness and Emergency Preparedness (PREP) Act allowed pharmacists to administer all vaccines down to age 3. During that 3-year period, only 3 pharmacies in Rhode Island ordered routine vaccines for children, totaling only 260 doses. Massachusetts allows for the administration of vaccinations by pharmacists down to age 5; whereas Connecticut allows this practice down to age 12.

RIDOH has concerns about the significant fiscal and practical impacts the enactment of H 6037 would have on RIDOH's Childhood Immunization Program. Specifically, the program would require additional state staffing for which the proposed legislation does not provide. Not having the additional state staff will impact the program's ability to meet federal requirements of the Vaccines for Children (VFC) Program. Specifically, RIDOH would be required to conduct the additional site visits that it currently is not required to do.

Allowing pharmacies to administer all routine vaccines for children would require them to be enrolled in the federal Vaccines for Children (VFC) program. This program has very stringent compliance visit requirements that pharmacies are not subject to under the current law. Currently, not every pharmacy gets a site visit annually, but under VFC that would change, and they would have to have an annual visit performed by RIDOH staff, therefore requiring additional staff to meet this increase in work.

In addition, there could be an impact to the assessment and insurance companies who pay into the assessment for vaccine purchase. If enacted, H 6037 could cause an increase in the assessment, increasing the dollar amount paid by the insurers and ultimately Rhode Islanders, as the assessment is factored into health insurance premiums.

Finally, VFC compliance visits, which are required by the US Centers for Disease Control and Prevention (CDC), are more laborious than the site visits pharmacies currently receive in Rhode Island. VFC Compliance visits would require pharmacists to pull a certain number of records

prior to the visit and it would take about 3 times as long to complete the visit (currently pharmacy visits take about 30 minutes, VFC Compliance visits take 1.5 hours).

Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in black ink, reading "Jerome M. Larkin" with a stylized flourish at the end.

Jerome M. Larkin, MD  
Director

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