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TTY: 771
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March 3, 2026

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

RE: H 7934 – An Act Relating to Businesses and Professions – Pharmacies

Dear Chair Donovan:

Please accept this letter regarding H 7934, legislation that would amend Section 5-19.1-31 of the General Laws in Chapter 5-19.1 entitled "Pharmacies" to allow the administration of routine, scheduled, or recommended immunizations to individuals between the ages of 3 and 18 under the existing statutory requirements for parental consent and reporting. The Act would take effect upon passage.

Although the Rhode Island Department of Health (RIDOH) applauds the public health goal of H 7934, RIDOH wishes to inform the Committee about the significant fiscal and practical impacts the enactment of the bill would have on RIDOH's Childhood Immunization Program. Specifically, the program would require additional State staffing with funding 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 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 pharmacies would have to have an annual visit from RIDOH staff, therefore requiring additional staff to meet this increase in work.

In addition, there could be an impact to the assessment and to insurance companies who pay into the assessment for vaccine purchase. If enacted, H 7934 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 patient records prior to the visit, and it would take about three times as long to complete the visit (currently pharmacy visits take about 30 minutes, VFC Compliance visits take 90 minutes). Being enrolled in the VFC program would also require pharmacies to report immunizations administered to the Rhode Island Child and Adult Immunization Registry (RICAIR). Participating in RICAIR could require pharmacies to pay for upgrades to their electronic medical record (EMR) system. Many independent pharmacies currently do not report to RICAIR or report sporadically.

Thank you for the opportunity to comment on this legislation which is dependent upon securing the financial resources necessary to fulfill the important public health goals of the bill.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin" with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

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