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March 30, 2026

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

**RE: H 8318 – An Act Relating to Food and Drugs -- Uniform Controlled Substances Act**

Dear Chair Donovan:

Please accept this letter regarding H 8318, legislation that would not allow prescriptions for testosterone to be transmitted or reported within the prescription drug monitoring database and would remove from the records all existing information concerning prior testosterone prescriptions.

We applaud and support intent of this legislation, however, the Rhode Island Department of Health (RIDOH) has concerns about the ability to monitor abuse of testosterone if this legislation is enacted. Testosterone is federally scheduled as a CIII and since we defer to the federal register ([eCFR :: 21 CFR Part 1308 -- Schedules of Controlled Substances](#)), it is a CIII in Rhode Island. In addition to being an anabolic steroid (which can be dangerous and pose many health risks), testosterone is considered a hazardous drug (listed on the NIOSH list in Table 2 ([NIOSH List of Hazardous Drugs in Healthcare Settings, 2024](#))). There would also be costs to RIDOH associated with carving out testosterone from the PDMP. Due to the potential for abuse, RIDOH recommends testosterone remain a controlled substance and reportable to the PDMP.

We look forward to working with the sponsors of H 8318 to ensure that protections are in place and that testosterone is not abused.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin".

Jerome M. Larkin, MD  
Director

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