



RI Department of Health
Three Capitol Hill
Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

March 3, 2026

The Honorable Melissa A. Murray, Chair
Senate Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: S 2033 – An Act Relating to Businesses and Professions – Protections of Healthcare Providers Act

Dear Chair Murray:

Please accept this letter regarding S 2033, legislation that would provide that the prescription label for medication abortion prescription drugs may include the name of the dispensing healthcare practice instead of the name of the dispenser. Although RIDOH appreciates the intent of the legislation, we wish to offer the following information for the Committee members' consideration.

The proposed legislation unintentionally creates an accountability issue should the prescription be incorrect (i.e., wrong dosage) and causes harm to a patient, which could impact patient safety protections. A February 19, 2025 Peabody-Nixon LLP Healthcare Alert noted that a similar Illinois amendment is likely to face legal and operational challenges, including conflicting rules under legal frameworks (such as those of the federal Food and Drug Administration); conflicting state law and pharmacy board rules; medical liability and malpractice claims; informed consent and patient rights; fraud and prescription verification; pharmacy workflow and patient safety; and prescription transfers and refills. [Healthcare Alert / Nixon Peabody LLP / February 19, 2025](#).

Federal laws and regulations mandate the inclusion of prescriber names on prescription labels. The proposed A 2033 does not appear to include a provision for protecting a pharmacist's name and/or initials and incorrectly utilizes the words "dispensing" and "dispenser" instead of correctly using the words "prescribing" and "prescriber".

Thank you for the opportunity to comment on this well-intended, but challenged, legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is written in a cursive style with a long horizontal flourish at the end.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Health and Human Services
The Honorable Pamela J. Lauria
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy