



RI Department of Health
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TTY: 771
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April 7, 2026

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

RE: S 2889 – An Act Relating to Food and Drugs -- Uniform Controlled Substances Act

Dear Chair Murray:

Please accept this letter regarding S 2889, 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 the 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 S 2889 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". The signature is fluid and cursive.

Jerome M. Larkin, MD
Director

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