

To Paula Pullano  
Department of Health  
3 Capital Hill  
Room 410  
Providence, RI 02908  
Paula.Pullano@health.ri.gov

To Paula Pullano and the Department of Health,

I write today on behalf of the Rhode Island Pharmacist Association in regards to proposed rules identified as 216-ricr-20-20-6. The Association supports the rules regarding prescribing off label for COVID 19 patients. What the Association would ask the Department to consider is adding language that include language that supports the point of dispensing pharmacist from being the sole enforcement of this rule.

The reason this is requested is due to a few situations that came up under the emergency rule that mirrors this proposed permanent rule. The pharmacist at the point of dispensing received a prescription for a patient to take hydroxychloroquine without a past history of use. When the pharmacist called the prescribing physician, the pharmacist was told it was not their role to question the prescribing practices of the physician and to just fill the prescription. While this pharmacist followed the enforcement aims of this rule, to not have a follow up mechanism from the Board of Medicine or state regulator to reinforce the message can limit some individuals changing behaviors to me prescribing practices.

Thank you for your consideration,

Matthew Lacroix

President

Rhode Island Pharmacists Association