RIVMA
Rhode Island
Veterinary Medical
Association

February 1, 2025

Dr. Jerome Larkin
Rhode Island Department of Health
3 Capitol Hill
Providence RI 02908

Dear Dr. Larkin,

On behalf of the Rhode Island Veterinary Medical Association's Board of Directors I would like to thank the Department of Health for a thorough review of the originally proposed amendments to 216-RICR-40-05-14. We are grateful to have had an opportunity to discuss the 2024 suggestions with staff from the Department of Health and feel that the issues raised have been carefully revised in 216-RICR-40-05-14 (filing notice date January 6, 2025).

RIVMA has one remaining question on which we seek clarification:

14.10.4 Donation of Veterinary Medications for Use by Nonprofit, State, and Local Facilities
Section D1c
Maintain a record of the name, strength, and quantity of the donated medication received;

As we read the proposed edits to Donated Medications, D1c appears to indicate that the veterinary hospital that receives the donation from a patient/client is the entity responsible for logging and tracking that received medication as is the receiving non profit entity. Those medications are transported by a veterinary volunteer to the non profits. We'd like to confirm that the person who couriers the medication (transporter) is not also logging the donated medications.

Thank you again to the Department of Health staff for its thorough review and careful inclusion of the feedback of the RIVMA as presented in 2024 particularly the reference to the AVMA Code of Ethics.

We are very grateful to have been able to collaborate on this important set of regulations.

Sincerely,

Sarah Mercurio

Sarah Mercurio, DVM
President

cc: Peter Ragosta, RPh