

March 13, 2025



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

TTY: 771
www.health.ri.gov

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

RE: H 5615 – An Act Relating to Food and Drugs – Uniform Controlled Substances Act

Dear Chair Donovan:

Please accept this letter of support for H 5615, legislation that would revise sections of the *Uniform Controlled Substances Act* to remove specific opioid dosage requirements and revise the *Uniform Controlled Substances Act* in accordance with current standards of professional practice and would repeal Chapter 37.4 of Title 5 of the R.I. Gen. Laws relating to intractable pain treatment. This act would take effect upon passage. This legislation was introduced at the request of the Rhode Island Department of Health (RIDOH).

From a clinical perspective, Rhode Island's *Intractable Pain Treatment Act* is outdated. The definitions of acute pain, chronic pain, and chronic intractable pain have been added to the proposed revised statute, while repealing the *Intractable Pain Treatment Act*.

There is also a discrepancy in the State's *Uniform Controlled Substances Act* with current national standards for specific opioid dosage requirements. H 5615 would revise sections of the *Uniform Controlled Substances Act* (Sections 21-28-1.02, 21-28-3.20, and 21-28-3.1) to remove specific opioid dosage requirements [e.g., "initial prescriptions of opioids shall not exceed thirty (30) morphine milligram equivalents (MMEs) total daily dose for a maximum total of twenty (20) doses"] and would allow practitioners to "prescribe the lowest effective dosage of an immediate-release opioid in a quantity sufficient to treat the expected duration of pain." The proposed legislation would simply align Rhode Island's existing statutes with current national standards.

Thank you for the opportunity to comment on this legislation, which will provide prescribers with increased flexibility to meet opioid dosage requirements that better meet their patients' specific pain management needs. RIDOH is happy to answer any questions the members of the Committee may have regarding the proposed amendments.

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 Matthew S. Dawson
The Honorable Members of the House Committee on Health and Human Services
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy