



March 29, 2022

The Honorable Stephen M. Casey
Chair
Rhode Island House Health and Human Services
2F 625 Park Ave.
Woonsocket, RI 02985

Rhode Island House Bill 7990 – OPPOSE

Dear Chair Casey and members of the House Health and Human Services Committee:

The American Pharmacists Association (APhA) and the Rhode Island Pharmacists Association (RIPA) respectfully write in concern to House Bill (HB) 7990, which will authorize pharmacists to dispense ivermectin for the treatment of COVID-19 pursuant to a standing order issued by licensed health care providers. Although our organizations are strongly supportive of tools that increase the efficiency of health care delivery, such as standing orders, our associations advocate for the safe and effective use of medications for indications based on current evidence-based, peer reviewed published literature.

APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession. APhA represents pharmacists in all practice settings, including community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care and enhance public health. In Rhode Island, APhA represents pharmacists and students that practice in numerous settings and provide care to many of your constituents. As the voice of pharmacy, APhA leads the profession and equips members for their role as the medication expert in team-based, patient-centered care. APhA inspires, innovates, and creates opportunities for members and pharmacists worldwide to optimize medication use and health for all.

Established in 1874, RIPA has a rich history and is one of the oldest state pharmacist associations in the country. RIPA unites all pharmacists of the state for professional development and advancement, elevates practice standards, advocates for pharmacy, disseminates relevant scientific and professional information, and encourages collaboration between all allied health professions towards the improvement of public health.

One of the key roles of the pharmacist as a member of the interprofessional healthcare team is to ensure the safe and effective use of medications by their patients. Pharmacists do this through steps in the medication dispensing process, such as prospective drug utilization review where the pharmacist evaluates the appropriateness of a medication for an individual patient before the medication is dispensed. Pharmacists rely on their knowledge, experience, professional judgment, and ongoing review of current evidence-based, peer reviewed published literature to confirm appropriate use of a medication for a specific indication. They check for the safe and effective dose of medication for a specific patient which is especially important for patients with allergies, kidney disease, liver disease, or other past medical histories which may change the safe or effective dose of a medicine. Pharmacists review interactions the medicine may have with other drugs, disease states, foods, or other items a patient may interact with. All of this is completed under the pharmacist's state scope of practice within Rhode Island and within their professional judgement, which has been formed through six to eight years of collegiate and doctoral level training including over 1,700 hours of hands-on experiential education in patient care settings.

Based on the extensive education and training of the pharmacist, our organizations support the deferral to the pharmacist professional judgement to ensure the safe and effective use of medications. Our organizations encourage

that if standing orders are developed for ivermectin for the treatment of COVID-19 that the development process be consistent with how other standing orders in the state have been developed and that the pharmacist maintains the authority to ensure the safe and effective use of medications. Our organizations encourage that all standing orders be based on current evidence-based, peer reviewed published literature.

Although strongly supportive of tools that increase the efficiency of health care delivery, such as standing orders, our organizations are concerned that current evidence-based, peer reviewed published literature does not support the use of ivermectin for COVID-19¹ and there is not a current need for legislation to allow pharmacists to dispense ivermectin for the treatment of COVID-19.

For these reasons, we oppose HB 7990 and respectfully request your “NAH” vote. If you have any questions or require additional information, please don’t hesitate to contact E. Michael Murphy, PharmD APhA Advisor for State Government Affairs by email at mmurphy@aphanet.org.

Sincerely,

Ilisa BG Bernstein, PharmD, JD, FAPhA
Senior Vice President, Pharmacy Practice and
Government Affairs
American Pharmacists Association

Chris Federico PharmD, BCACP
President
Rhode Island Pharmacists Association

Mark Lorson PharmD, BCACP, BCGP
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¹ [Ivermectin Treatment Efficacy in Covid-19 High Risk Patients - Full Text View - ClinicalTrials.gov](#)