



## Madison Brame

**From:** IRRC  
**Sent:** Monday, July 18, 2022 10:17 AM  
**To:** Michelle Elliott; Shani Shenk; Fiona Cormack  
**Cc:** Stephen Hoffman; Madison Brame  
**Subject:** FW: Comment on Regulations 10-219

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Comment on #3290.

*Kathy Cooper*

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**From:** Brendan Degnan <brendanjfdegan@gmail.com>  
**Sent:** Sunday, July 17, 2022 4:13 PM  
**To:** IRRC <irrc@irrc.state.pa.us>  
**Subject:** Comment on Regulations 10-219

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Dear IRRC Board,

Thank you for allowing me to submit a comment.

My name is Brendan Degnan and I am a medical professional at a medical marijuana dispensary in Pennsylvania. The following are my opinions and not the views of my employer.

I am writing to comment on Statue 1161a.25.(b) which states the physician, pharmacist, physician assistant or certified registered nurse practitioner at medical marijuana dispensaries “may **rotate** coverage of the facilities, provided that a physician or pharmacist is always [present] available, either in person or by **synchronous interaction**, at one of the facilities.”

1. With the utilization of temporary pandemic regulations, dispensaries were able to remain open in the event of medical emergencies or sickness involving medical professionals. Given a medical professional's client-facing responsibilities, allowing the ability for remote verification was prudent to allow patient's medications to remain accessible and medical professional services to be **available**. Continuing to allow for this flexibility is vital.
2. Synchronous interactions with medical professionals are imperative to the success of our medical marijuana program in Pennsylvania. In particular, pharmacists' access, relationships and expertise contribute to positive health outcomes and harm reduction. Big cannabis companies have laid-off medical practitioners and require remaining medical professionals to simultaneously cover several locations (sometimes five at a time). Synchronous interactions with patients is unachievable when covering multiple high-volume locations.

3. Regulations need to allow for remote verification **in the event of an emergency**, but it should not be the **standard**. I propose language be changed from “may rotate coverage of the facilities” to “may rotate coverage of the facilities in order to relieve another medical professional.” This will allow for continued patient access to medications and ensure patients can discuss cannabis options synchronously with a medical professional.

The inclusion of medical professionals in our Pennsylvania medical marijuana program, compared to neighboring states, is incredibly impactful for patient care. If medical professionals were not present at the dispensary, conversations between patients and staff members would be driven by marketing and sales information, which promotes pseudoscience. All of the value medical professionals add to dispensaries, such as guidance with dosing, insight into drug interactions, and formulation recommendations are what make our state program so medically focused.

Medical marijuana in America is in its infancy. Several licensed operators in Pennsylvania are uninterested in the medical value of their products, and are more focused on profits rather than patient care, which could interfere with the medical market maturation. Medical professionals are patient advocates and essential to maintain the integrity of the medical program. This industry was built upon the suffering of individuals who, until they discovered cannabis as a useful tool to relieve their distressing symptoms, were hopeless and came to this therapy as a last resort. We need to keep these patients' interests at the forefront of legalization legislation and their struggles as we move forward to provide cannabis to the masses in general.

Especially as Pennsylvania approaches consideration of an adult-use cannabis program, it is imperative that access to guidance to healthcare professionals remain accessible for those using cannabis for medicinal purposes.

Thank you for your time and consideration regarding this matter.

1. S Datttani, H Mohr, et al. Pharmacists' role in cannabis dispensing and counselling. Cannabis Pharmacist Journal. 17 Dec 2018