



Independent Regulatory Review Commission
333 Market Street
Harrisburg, PA 17101
Re: Rulemaking #10-219: Medical Marijuana
July 18, 2022

To the Members of the Independent Regulatory Review Commission and Department of Health:

Thank you for considering my comments regarding the Final Rules and Regulations. These remarks are my opinion and not the views of my employer.

My name is Tina Brunetti and I am a licensed, practicing pharmacist in Pennsylvania. I have been working in a medical marijuana dispensary since March 2018. I am writing to comment on *Section 1161a.25(b) Licensed Medical Professionals At Facility*.

Act 16, section 801(b) requires a dispensary to have a physician or a pharmacist available, either in person or by synchronous interaction, to verify patient certifications and to consult with patients and caregivers at all times during the hours the dispensary is open to receive patients and caregivers. Prior to Covid, dispensaries employed one, distinct medical professional per dispensary, a 1:1 ratio. This allowed medical professionals to interact with their patients on a more personal level, encouraging them to be more involved with their specific health needs and desired health outcomes. We call this patient-centered care; it motivates active participation and shared-decision making between patients and their families, helping us design and manage a comprehensive care plan. It also allows the medical professional to catch any cannabis-drug interactions, mitigating any adverse events. It is impossible for medical professionals to provide this type of personal care if we are covering more than one dispensary per shift. Some dispensaries see 300-400 patients per day; multiply that by three dispensaries. That's 1,200 patient certifications we are checking each day as well as providing consultations.

While Act 44 of 2021 allows for synchronous interaction, it does not clarify whether one, distinct medical professional is still required per dispensary. The Department of Health (The Department) believes this is enshrined in the Act but it is not. I ask that The Department clearly define this 1:1 ratio in the Final Rules and Regulations as it will decide whether Pennsylvania patients continue to get the best patient-centered care.

Thank you for your consideration.

Sincerely,

Tina Brunetti, RPh, MS Gerontology
PA Pharmacists Advisory Board

