



July 19, 2022

Independent Regulatory Review Commission (IRRC)  
333 Market Street, 14th Floor  
Harrisburg, PA 17101

Dear IRRC Board,

I respectfully submit these comments to the Pennsylvania Independent Regulatory Review Commission regarding proposed permanent regulation 28 Pa. Code § 1171a.29(c). The following are my own opinions and not that of my employer.

My comments pertain to section 1161a.23.b.2 Dispensing Medical Marijuana Products and 1161a.25 Licensed Medical Professionals at facility.

I have worked as a pharmacist in the dispensary setting since Fall of 2019. At this time my employer required every new patient to the program to receive a consultation with the medical professional onsite. The medical professionals would also follow up with the patients to help make adjustments to their regimen as needed. Finding the right cannabis products and dose can take time and requires adjustments to titrate patients to the smallest effective dose for their specific ailment. Many patients give up and state "cannabis does not work for me" before finding their effective dose. This is why having a medical professional in the dispensary is important. It is important to educate patients on expectations as cannabis is not a one size fits all dosing system like so many other drugs that patients are used to consuming. Medical professionals in the dispensary are uniquely equipped to review side effects, drug interactions, cannabis education, regulatory restrictions and making dose recommendations.

I have heard many stories from patients about their visits to other dispensaries in which they were deprived the chance to speak with a medical professional and felt confused, overwhelmed and helpless. For example, one patient I met with was trying to treat nerve pain from chemotherapy. She had been arbitrarily recommended a cartridge by the sales staff of another dispensary and after trying it for the first time, "never wanted to touch the stuff again," and stated "it was one of the worst days of my life." This is a woman who is battling cancer and recently lost her mother. We can avoid these moments. After getting over her first experience, she remembered her doctor recommended my dispensary. She said that the first dispensary she visited never mentioned a consultation or a pharmacist. After consulting with the patient, we came up with a regimen to suit her symptoms. I followed up with her a week later, she had a whole new outlook on cannabis and considered it a great addition to her pain management.

Dispensaries are allowing patients to waive their new patient consultation, often with the patient unaware of what they are actually waiving. With this waiver and with Act 44 allowing synchronous interaction medical professionals have been laid off.

Incorporating the following steps can greatly enhance patient outcomes:

1. Require consultations for first time patients who are new to the program.
2. Allow medical professionals to focus on one location at a time.
3. Encourage high standards of quality of consultation including, but not limited to, side effects, drug interactions, cannabis education, regulatory restrictions and making dose recommendations.

Thank you for your time and consideration.

Sincerely,  
Nicole Nowlan, Pharm.D.