



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 of PA Medical Marijuana Act 16. These remarks are my opinion and not the views of my employer. I am writing to comment on **Section 1161a.25(b) Licensed Medical Professionals At Facility**.

As a pharmacist who has been working in a PA dispensary for the past 4.5 years, I have seen firsthand the impact we have had on the quality and safety of patient care in the Medical Marijuana program. Pennsylvania is one of few states that require a pharmacist at each dispensary; however, patient care varies greatly between different dispensaries. **It is my opinion that a 1:1 ratio of pharmacist-to-dispensary is the minimum ratio necessary to provide clinical care** including counseling, dosing, drug interaction checking, minimizing and monitoring for side effects, ensuring positive therapeutic outcomes, and keeping patient costs to a minimum. Certifying, primary physicians, and specialists almost always defer the decision-making recommendations to the dispensary pharmacist and rely upon them to provide safe and effective care within the Medical Marijuana program.

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.

I recommend the regulations specifically state a minimum of a **1:1 ratio (one pharmacist at each dispensary site)** be written into the Act. I agree that remote synchronous interactions should be allowed for pandemic or other emergency reasons, for continuity of care and patient access to pharmacists at the dispensary.

Thank you for considering my comments,

Rebecca McCaskey, PharmD  
Cannabis Pharmacist  
PA Pharmacist Advisory Board to the Medical Marijuana Program