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Pennsylvania Independent Regulatory Review Commission
October 7, 2022

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Independent Regulatory
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Dear Members of the Independent Regulatory Review Commission and Department of Health,

My name is Christine D. Findlay and I have been a licensed, practicing pharmacist in Pennsylvania since 1982. I have been working in the cannabis industry as a pharmacist since 2019.

Thank you for reviewing and reflecting upon my remarks prior to the finalization of the rules and regulations, especially regarding section 1161a.23 (b) pertaining to the Dispensing of Medical Marijuana Products.

The following statements are my own opinions and are independent of my employer.

It has come to my attention that the section of the Preamble can be interpreted in two different ways. As the IRRC's job is to ensure the wording of all Acts are consistent with legislative interpretation, I would ask that this be clarified to avoid misinterpretation.

This section states:

- (b) Prior to dispensing medical marijuana products to a patient or caregiver, the [dispensary] dispensary's medical professional shall:
 - (1) Verify the validity of the patient or caregiver identification card using the electronic tracking system.
 - (2) Review the information on the patient's most recent certification by using the electronic tracking system to access the Department's database

I assume this means that the medical professional is validating the patient or caregiver card and also reviewing the most recent certification on the DOH website (Oracle). Otherwise, it could be interpreted to mean that the medical professional is in the admission's office, scanning the patient's medical marijuana card and then proceeding to check the certification on the DOH electronic tracking system, while also giving consultations. This interpretation does not allow for patient care, nor efficiency either. However, I can understand why this is confusing. It is important for this to be clarified so we understand the role of the medical professional within the dispensary.

Thank you for considering this clarification,

Christine D. Findlay, RPH