



October 7th, 2022

Pennsylvania Independent Regulatory Review Commission  
Chairperson George D. Bedwick  
Vice Chairperson John F. Mizner, Esq.  
Commissioner John J. Soroko, Esq.  
Commissioner Murray Ufberg, Esq.  
Commissioner Dennis A. Watson, Esq.

Dear Sirs,

Hello and thank you for considering my remarks before the rules and regulations are promulgated. My name is Lauren Vrabel and I am a licensed pharmacist who has been practicing in the Pennsylvania Medical Marijuana Program since 2018. The following are my own opinions and not those of my employer.

I would like to review section § 1161a.23 regarding Dispensing medical marijuana products. Subsection (b) (1) has been updated to indicate that prior to dispensing medical marijuana products to a patient or caregiver, the dispensary's medical professional shall verify the validity of the patient or caregiver identification card using the electronic tracking system. Per section §1141a.21 the electronic tracking system is the seed-to-sale system approved by the department, which is MJ Freeway. MJ Freeway can validate the patient's card, but does not contain all of the information provided in the patient's certification. There is a separate system called Oracle that the medical professional utilizes to check the patient certification.

I am asking to clarify in the final form rules and regulations whether it is intended for the medical professional to validate the patient or caregiver card in MJ Freeway. If this is the intended interpretation the medical professional would be required to also serve as the in-take person in order to ensure that every card has been validated, leaving little time for patient consultations and negating the ability to perform synchronous (telemedicine) communication. Please note, the language here does not use "patient certification," it specifically states the patient or caregiver card.

Sincerely,  
Dr. Lauren Vrabel, PharmD