

Dispensary Rules Comments

State of Ohio Board of Pharmacy





Public comment

- Responses tracked by individual category
- 348 comments received



High volume comment categories

Category	Number of Comments
Advertising	21
Application process	22
Clinical director	13
Definitions	17
Dispensary employees	12
Dispensary operations	21
Fees	31
Grounds for discipline	13
Home delivery	16
Number of dispensaries	16
Purchasing options	10



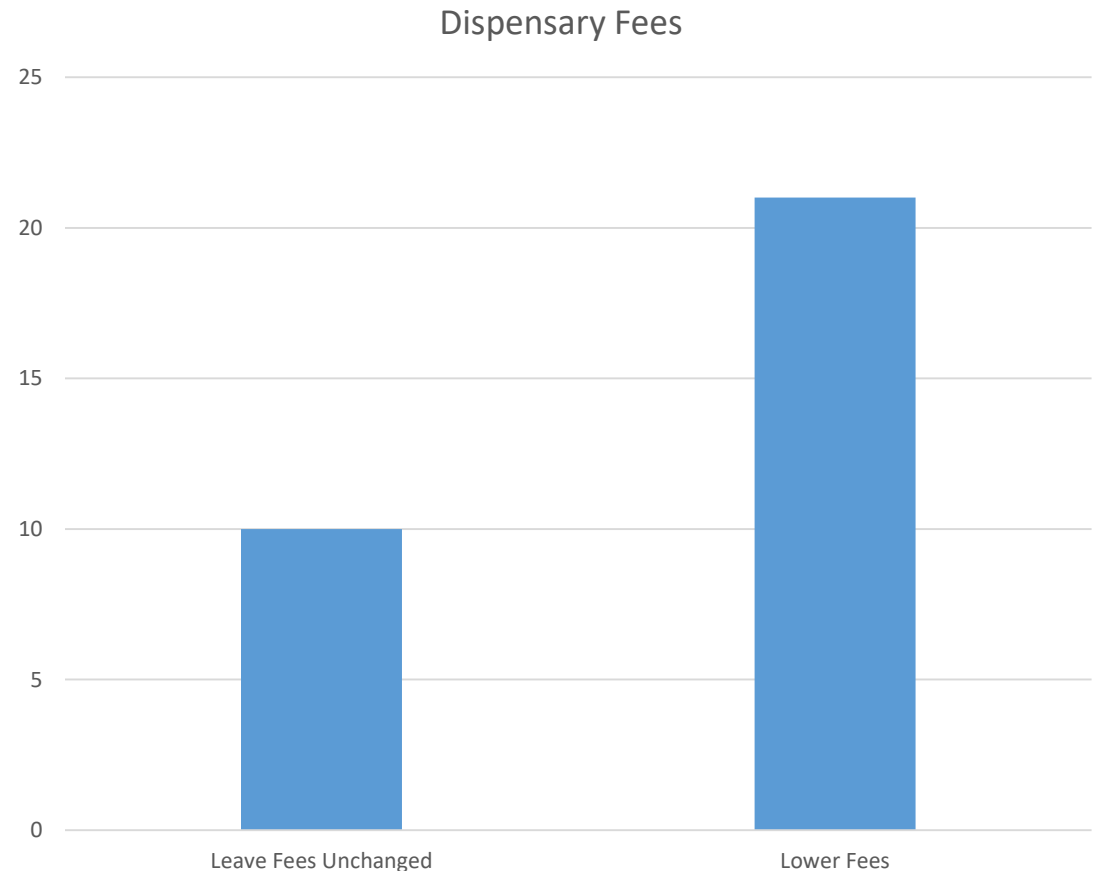
Number of dispensaries

- All but one comment related to the initial number of dispensaries suggested increasing the initial number of awards
- Continue to assess potential patient population and geographic distribution
- Taking only geographic distribution into account there would need to be 34 dispensaries so that no patient is more than 25 miles from a dispensary
- Recommend raising the initial number of dispensaries to 60



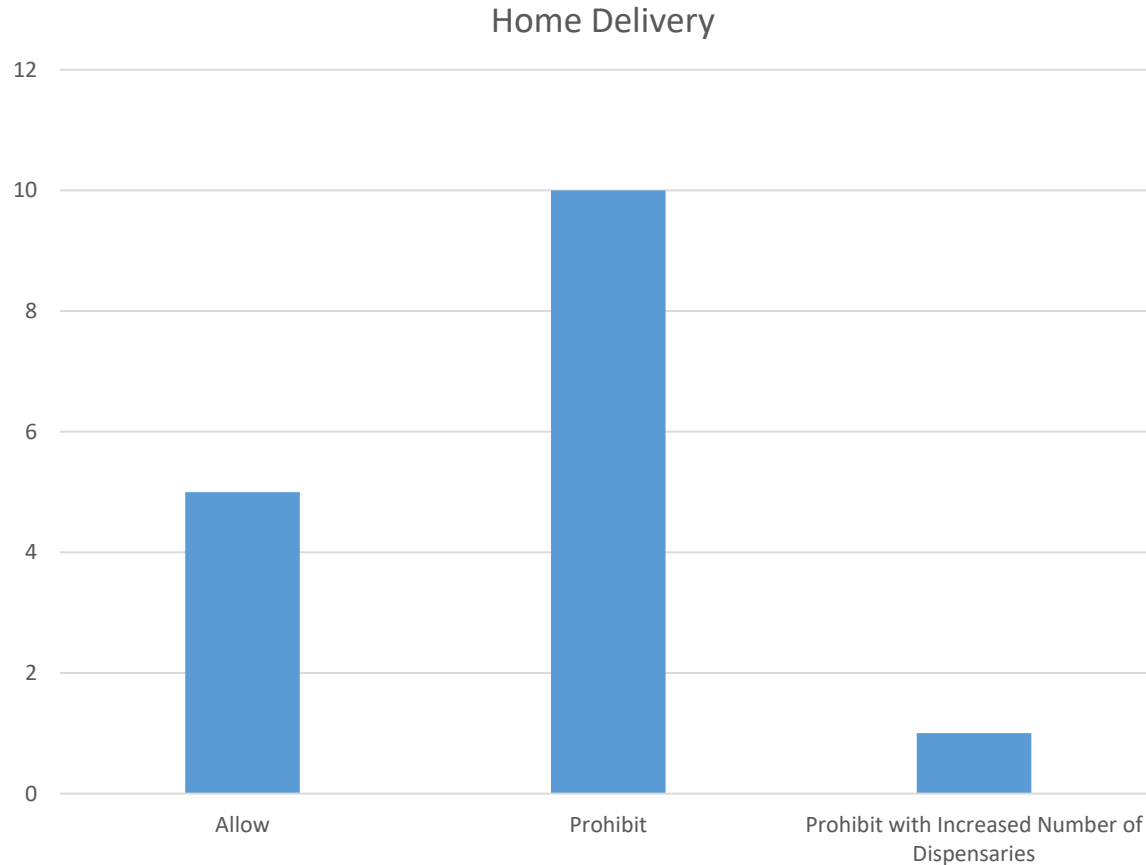
Dispensary fees

- 31 comments related to dispensary fees
- 10 suggested fees be left unchanged and 21 suggested reduced fees
- Recommendation is to decrease the dispensary certificate of operation fee





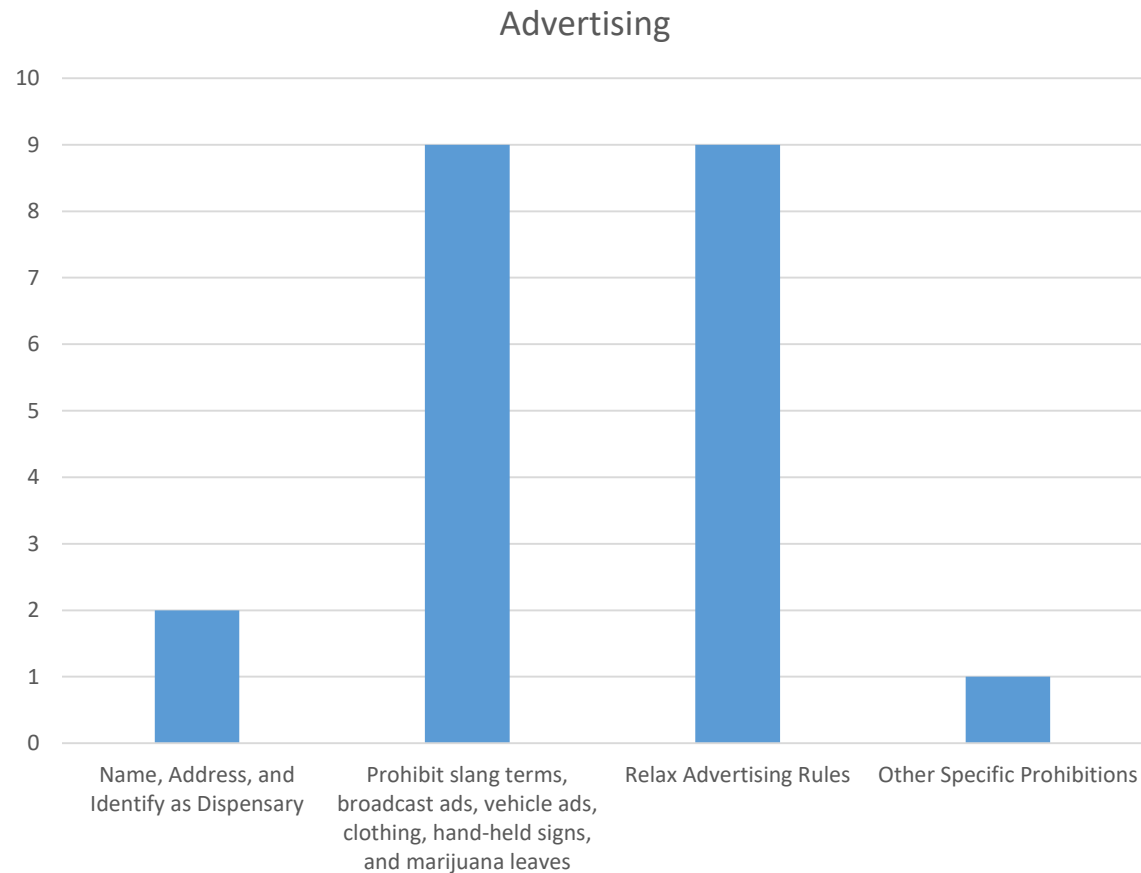
Home delivery



- 16 comments related to home delivery
- 5 suggested allowing home delivery and 10 suggested prohibiting home delivery
- Due to public response and increase in the number of dispensaries home delivery is not recommended at this time



Advertising

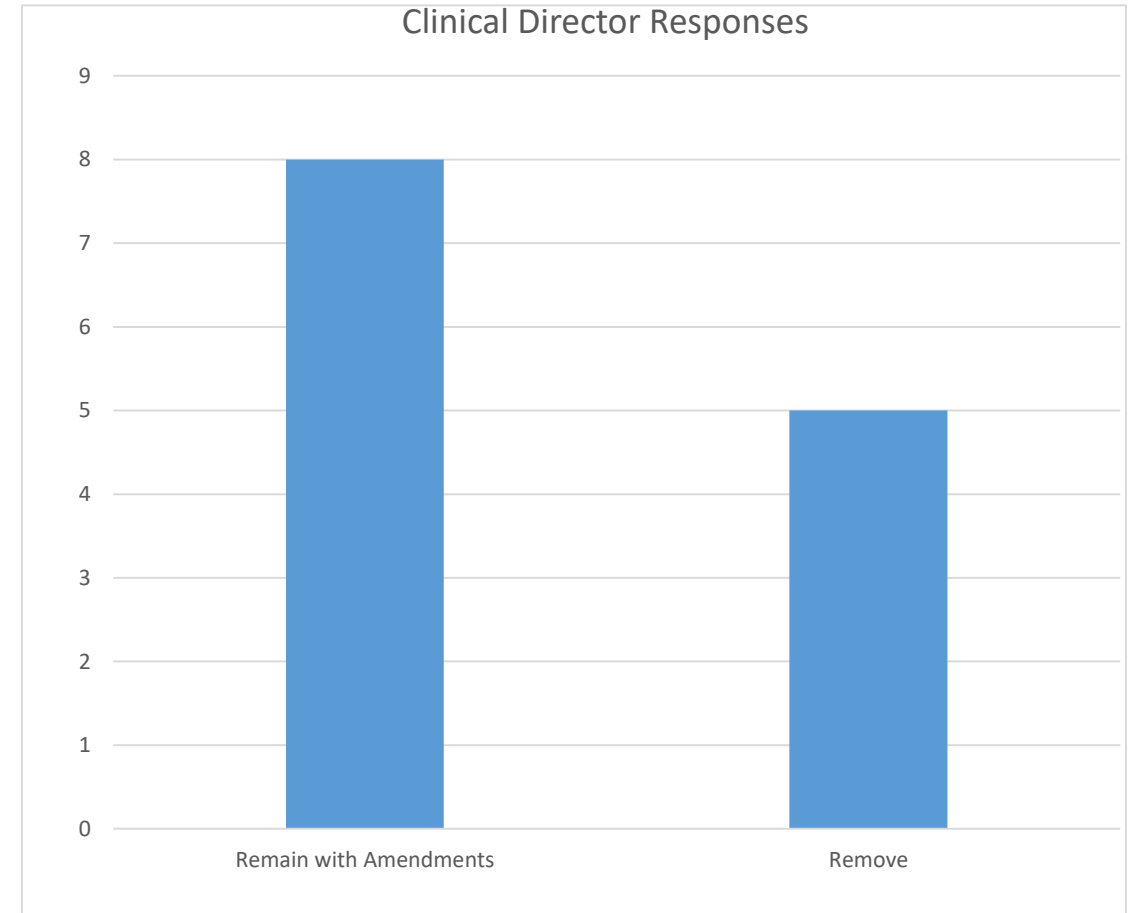


- 21 comments related to advertising
- 12 suggested additional restrictions and 9 suggested relaxed rules
- Working with Department of Commerce to ensure uniformity program wide



Clinical director

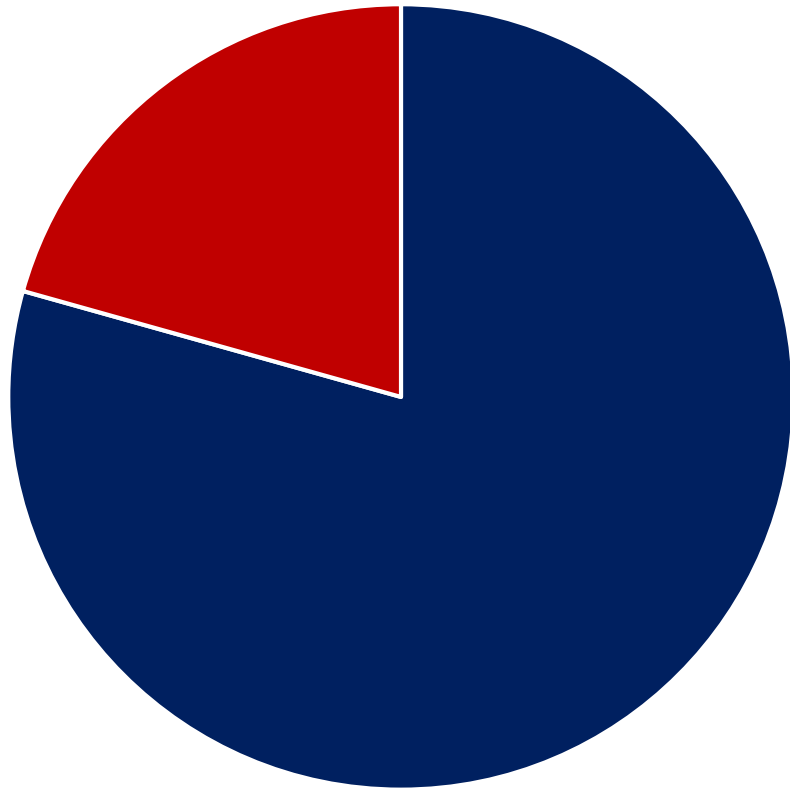
- 13 comments related to the clinical director position
- 8 comments suggested an amendment to the clinical director rule; 5 recommended eliminating it
- Survey of eligible prescribers illustrated few who were both willing and authorized by employer to serve as a clinical director



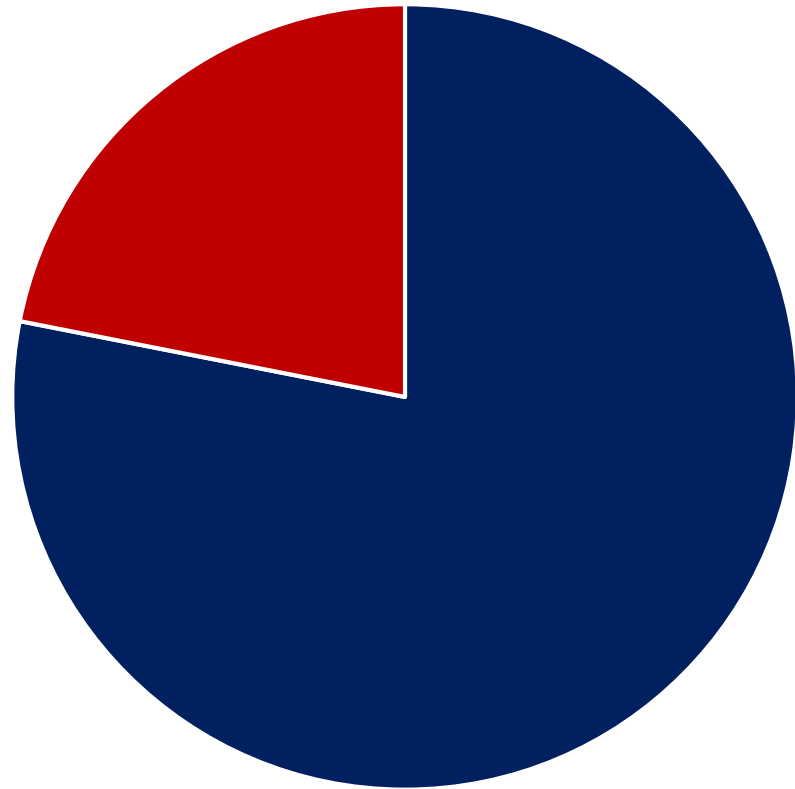


Clinical director

565 Prescribers Willing to Advise Employees



609 Prescribers Willing to Advise Patients and Caregivers





Purchasing options

- 9 of 10 comments sought to prohibit coupons and discounts except to benefit veterans and the indigent and the remaining comment sought to prohibit coupons and discounts in their entirety
- It is recommended that coupons only be allowed for the benefit of veterans and the indigent



Hours of operation

- 7 comments related to hours of operation
- Topic of interest for the Medical Marijuana Advisory Committee
- Current draft limits hours of operation to between 7 a.m. and 7 p.m.
- Recommend extending hours to 7 a.m. to 9 p.m.



Miscellaneous

- Variety of subjects within remaining categories, making generalized summaries a challenge
- Included:
 - General comments of approval or disapproval
 - Questions related to information that will be available through other rule sets
 - Suggested changes that require amended statutory authority
 - Comments related to regulations falling outside the scope of the State Board of Pharmacy