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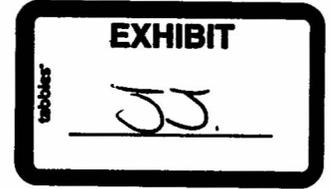
DEPT OF CONSUMER PROTECTION  
OFFICE OF THE COMMISSIONER

2:30 pm

ALAN P. CURTO Direct 860 297-4694 curto@halloran-sage.com

April 26, 2013

VIA HAND DELIVERY



Commissioner William M. Rubenstein  
Department of Consumer Protection  
Room 103, State Office Building  
165 Capitol Avenue, Hartford, CT 06106

Dear Commissioner Rubenstein:

We enclose ten (10) copies of the Connecticut Cannabis Business Alliance's written comments to the proposed regulations of the Department of Consumer Protection concerning Palliative Use of Marijuana.

Please contact the undersigned or Attorney Richard Roberts of this firm if you have any questions concerning this submission.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Curto".

Alan P. Curto

APC/

Enclosures

cc: Eileen Konieczny, RN / Executive Director  
Connecticut Cannabis Business Alliance (w/o encl.)



Eileen Konieczny, RN  
Connecticut Cannabis Business Alliance  
109 Federal Rd. #204  
Danbury, CT 06811

Mr. William M. Rubenstein  
Commissioner State of Connecticut  
Department of Consumer Protection  
State Office Building  
165 Capitol Ave.  
Hartford, CT 06106

Public Comment regarding  
Regulations of the Department of Consumer Protection  
Concerning  
Palliative Use of Marijuana

Dear Commissioner Rubenstein,

My name is Eileen Konieczny. I am a professional Registered Nurse in the state of CT and Executive Director of the Connecticut Cannabis Business Alliance. As a nurse and patient advocate I wanted to share some of my thoughts, comments and suggestions for the Department to consider prior to issuing the final Regulations concerning the Palliative Use of Marijuana.

***Section 21a-408-9(c) A qualifying patient or primary caregiver may change their designated dispensary facility no more than four times per year without good cause shown and prior approval by the commissioner or the commissioner's authorized representative.***

If a dispensary is reporting into the PMP as required in Section 21a- 408- 50; this should allow patients the autonomy to visit any dispensary in the state of Connecticut. Their information will be tracked in "real time" thereby allowing the patient access to the diversity of all of Connecticut's medical cannabis strains, without the unnecessary expense, paperwork and time required by a designation and/or change in designation.

***Section 21a-408-10(b) A qualifying patient and primary caregiver in possession of marijuana shall maintain it in the container in which it was sold or dispensed.***

As with any medication I believe that it is very important to keep medicines properly labeled and out of the reach of children. What I find to be problematic about this language is that it does not take into consideration the individual dosing regimen of a patient. I believe that patients need to be afforded the





right to maintain their medicine in individual or daily dosing units, which may not be how they have purchased their medicine.

I feel that if a patient is compliant of subsection (a) of this section: *A qualifying patient and primary caregiver shall store marijuana in a secure location to prevent theft, loss or access by unauthorized persons*, then the patient is doing their due diligence.

**Section 21a-408-16(f)** *Only a person who has held an active pharmacy technician registration in Connecticut within the five years prior to the application, who is 18 years of age or older, and is currently in good standing, or was in good standing at the time their registration lapsed, may apply for and receive a dispensary technician registration.*

I believe that the proposed regulation creates a barrier of entry to individuals who would be considered qualified employees except for their lack of experience as a pharmacy technician, and should be modified to allow for the opportunity to hire the best candidate for the job.

In my research regarding the qualifications of a pharmacy technician, I find this to be an entry level position, requiring no more than a high school diploma. A pharmacy technician assists licensed pharmacists with tasks like formulating, labeling, and dispensing medications, along with maintaining patient profiles and performing other routine tasks. A pharmacy technician is restricted in the scope of his/her practice, having all their work supervised and checked by a licensed Pharmacist. Most positions require a high school diploma or its equivalent and 0-3 years of clinical experience in a related field. Qualified applicants should also be familiar with standard concepts, practices, and procedures within a particular field.

The job duties of this profession vary. In many cases, pharmacy technicians handle a great deal of the routine clerking in a pharmacy; they accept and double check prescriptions, for example, or maintain patient records in computerized systems. A pharmacy technician may also talk with a pharmacist about potential drug interactions or other risks which the prescribing doctor may have missed. A licensed pharmacist still needs to check the work to ensure that it has been done correctly.

I feel there is nothing about the job of a pharmacy technician working in a dispensary that would prohibit anyone from applying and receiving a job as a dispensary technician.

**Section 21a-408-35(d)** *the consumption of food at the dispensary*

The allowance of juice, tea, water, coffee, and snacks should be a consideration for terminally/chronically ill patients as is allowed in most any physician office or clinic where they are spending time waiting &/or receiving counseling.

It is my hope that this information will be considered by the Departments in any redrafts or modifications of its Regulations.

Thank you for your time.

Sincerely,

Eileen Konieczny, RN

