

4/18/2013

To: William M. Rubenstein  
Commissioner, Department of Consumer Protection  
and the board of physicians

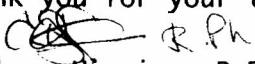
Re: Palliative Use of Medical Marijuana

The question I would like to pose to the board is in regards to compounding. Currently, medications that are not manufactured may be compounded by a pharmacist. I have made everything from atenolol suspensions to amphotericin troches. When there is a specific need for these medications that is not met by large scale manufacturers, it is the job of the pharmacist to calculate the dosing and compound the product according to very specific compounding regulations. I doubt we will have a need for sterile marijuana products, but, for this question, I will be referring to non-sterile products. For example, edible products and tinctures.

Marijuana is associated with smoking, but many patients prefer alternative methods. Specifically, if marijuana with high cannabidiol content is determined to decrease epileptic episodes, than there may be a demand to compound products for children.

Who will be allowed to compound? Is it just the distributor? Is it just the grower? Or are there going to be guidelines for the process to be done by either party.

Thank you for your time,

  
Colleen Higgins R.Ph.

**RECEIVED**

APR 22 2013

DEPT OF CONSUMER PROTECTION  
OFFICE OF THE COMMISSIONER

