



Medical Cannabidiol Program Update:

Status of HF2589 Implementation &
Data Update

Owen Parker, MPH
Program Manager
September 4, 2020

What We Will Cover

- Operational Highlights of HF2589 Implementation:
 - Elimination of the 3% THC Cap on Product Potency
 - Enforcement of 4.5g THC per 90 day Purchase Limit
 - Waiver Process for Practitioners to certify for >4.5g THC per 90 days
 - Issuance of Registration Cards by IDPH
 - IDPH Strategy for seeking a federal exemption from the DEA for cannabis as a schedule 1 controlled substance (facility protections)

- COVID-19 Impacts & Solutions

- Program Data Update

Recap: Implementation of HF2589 Highlights

- Elimination of the 3% THC cap on products, and movement to 4.5g THC per 90 days, with exceptions
- Adds ARNPs, PA, and Podiatrists to the definition of healthcare practitioner
- Adds Chronic Pain, PTSD, and Severe, Intractable Autism with Self-Injurious or Aggressive Behaviors to the list of qualifying conditions
- Dispensaries are required to employ a pharmacist or pharmacy technician to aid in dosing
- Removes the felony disqualifier for patients and caregivers
- Removes the limit on the number of Board meetings each year
- *Administrative Rules (ARRC 5082c) were noticed on July 15, 2020, and are moving on to the adopted stage. Few amendments are being considered on September 9 by SBOH



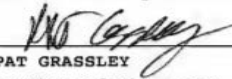
House File 2589


AN ACT
CONCERNING THE MEDICAL CANNABIDIOL ACT AND MARIJUANA.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF IOWA:

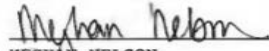
House File 2589, p. 9

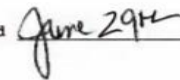
effective and continues in effect as issued for the twelve-month period following its issuance.


PAT GRASSLEY
Speaker of the House


CHARLES SCHNEIDER
President of the Senate

I hereby certify that this bill originated in the House and is known as House File 2589, Eighty-eighth General Assembly.


MEGHAN NELSON
Chief Clerk of the House

Approved  June 29th, 2020
KIM REYNOLDS
Governor

IT Solutions for 4.5g Limit Enforcement

- In order to aid dispensaries in enforcement of the 4.5g THC per 90-day purchase limit, The OMC has provided a look-up for dispensary staff when they check-in a patient or caregiver
- It provides dispensaries all the information they need to enforce this limit, with 4.5g as the default
- For patients who have 4.5g waivers approved, the OMC manually enters the limit identified by their HCP into the patient's profile



Search an account by Driver's License/State ID number or DOT Number

Patient

Account Name: Iowa Patient

Registration Number: 1000117

DOT Number: undefined

Account Application Status: Issued

mCBD Card Expiration Date: 7/1/2021

THC Limit: 4.5

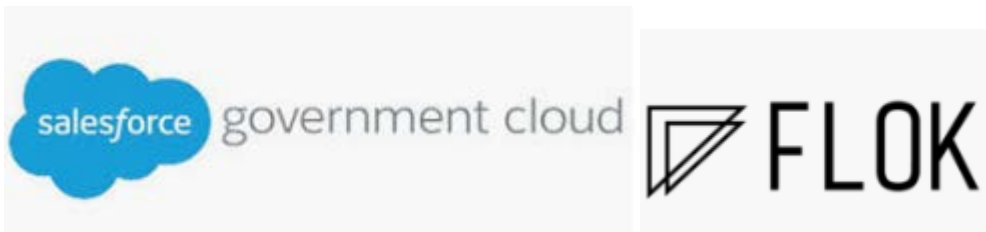
THC Sold: 2.1

THC Limit Remaining: 2.4



Registration Card Issuance by IDPH

- Previous issue: IDPH Approval, followed by physical visit to the DOT
- > 400 Approved-not-issued applications (paid fee) post-January 1, 2019. Cards were issued to those patients on July 1, 2020
- Positive feedback from patients on removal of this burden
- Time from Approval to Issuance greatly reduced



September 03, 2020

John B Sample
321 E 12th St
Des Moines, Iowa 50319

Dear John B Sample,

Your valid Medical Cannabidiol registrations cards are **Issued** below.

Please verify the information printed on the front of the cards is correct. If errors are found contact the office immediately.

This card validates that you are approved to purchase and possess products from Iowa's licensed medical cannabidiol dispensaries, and should be provided to dispensary staff at the time of check-in. Please visit the following page and scroll to the bottom for the dispensary addresses and an interactive map: <https://www.idph.iowa.gov/omc/For-Patients-and-Caregivers>.

Office of Medical Cannabidiol
IDPH/Bureau of Disability, Injury, and Compassionate Therapeutics
Lucas State Office Building
ATTN: OMC
321 E. 12th St.
Des Moines, IA 50319
Email: medical.cannabidiol@idph.iowa.gov
Phone: (515) 725-2076
OMC website: <https://idph.iowa.gov/omc>

Medical Cannabidiol Registration Card

Patient

John B Sample

Registration Number: 01033431

Issued: September 03, 2020 Expires: September 03, 2021

Gender: M DOB: 01/01/1980
321 E 12th St
Des Moines, Iowa 50319

4.5g Waiver for THC-Purchasing

- Must be completed by the original HCP who certified the patient.
- Patient must have participated in the program prior to completion.
- HCP must indicate the purchase limit they are certifying the patient for.
- Waiver data since July 1, 2020
 - **77** waivers completed
 - Waivers completed by **55** different HCPs
 - **66** waivers are for Chronic Pain
- Forthcoming agenda item for potential HCP waiver education

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IOWA DEPARTMENT OF PUBLIC HEALTH
Office of Medical Cannabis (OMC)

IOWA MEDICAL CANNABIDIOL PROGRAM

Waiver for Increasing the Amount of 'THC per 90 Days' for a Certified Patient

Instructions – Type or print clearly and answer all of the questions.

This waiver does not constitute a prescription for medical cannabis.

Healthcare Practitioners - PROVIDE THE COMPLETED and SIGNED FORM TO THE PATIENT

Patients should Email the completed form to: medical.cannabidiol@idph.iowa.gov		
Or mail the completed form to: Iowa Department of Public Health ATTN: OMC 321 E. 12 th Street Des Moines, IA 50319-0075		
Please print clearly - Incomplete or unreadable forms may result in denial of the waiver		
PATIENT INFORMATION		
Name (First, Middle, Last)		
Permanent Iowa Address (Street, Apt. #)		
Address (City, State, ZIP Code)		
Phone/Email (Phone number and email address)		

HEALTH CARE PRACTITIONER INFORMATION		
Health Care Practitioner's Name (First, Middle, Last, Suffix)		
Medical License Number	License State (Must be licensed in Iowa)	License Type (MD, DO, PA, ARNP, DPM)
Practice Address (Street)		
Practice Address (P.O. Box, Suite #)		
Address (City, State ZIP Code)		
Phone Number	Email Address	
Medical Specialty (Oncology, Neurology, Pain Management, etc.)		

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IOWA MEDICAL CANNABIDIOL PROGRAM

Waiver for Increasing the Amount of 'THC per 90 Days' for a Certified Patient

NOTE: The waiver for increasing the amount of THC per 90 days for a registered medical cannabis patient requires a medical evaluation *after* the original certification (unless certified for a terminal illness). The medical evaluation and this waiver form must be completed by the original Healthcare Practitioner who certified the qualifying patient for participation in Iowa's Medical Cannabis Program.

I _____ (the Healthcare Practitioner), hereby certify that, based on the patient's medical history, in my professional judgment, _____ (the registered qualifying patient), should be approved for an exception to the 4.5g THC per 90 day limit pursuant to the provisions of Iowa Code chapter 124 E. It is my professional judgment a quantity of _____g (must be indicated) per 90-day period should be approved to properly alleviate the patient's debilitating medical condition or symptoms associated with the debilitating medical condition.

Health Care Practitioner Signature	Date of Signature (mm/dd/yy)
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IDPH Strategy: Seeking DEA Exemption

- In their 2019 Annual Report, the Board recommended that IDPH seek protections for schools and facilities participating in our program and acting in compliance with Chapter 124E.
- The General Assembly prescribed in HF2589 that IDPH “seek guarantees” that Federal funding to institutions and facilities acting in compliance with Chapter 124E not have their funding withheld due to participation in Iowa’s program.
- The Department has determined that it will move forward with seeking an exception for cannabis as a schedule I substance in Iowa from the DEA, in attempt to minimize conflict between State and Federal Law.
- The Department will seek this exception using Title 21 Code of Federal Regulations 1307.03.

Sec. 31. PROTECTION OF FEDERAL FUNDING. The department of public health shall request guarantees from the agencies of the federal government providing funding to educational and long-term care facilities that facilities with policies allowing patients to possess medical cannabidiol on the grounds of the facilities consistent with chapter 124E or allowing facility staff to administer medical cannabidiol to a patient shall not lose eligibility for any federal funding due to such policies.

§1307.03 Exceptions to regulations.

Any person may apply for an exception to the application of any provision of this chapter by filing a written request with the Office of Diversion Control, Drug Enforcement Administration, stating the reasons for such exception. See the Table of DEA Mailing Addresses in **Sec. 1321.01** of this chapter for the current mailing address. The Administrator may grant an exception in his discretion, but in no case shall he/she be required to grant an exception to any person which is otherwise required by law or the regulations cited in this section.

[75 FR 10678, Mar. 9, 2010]

Impacts of COVID-19, Related Data

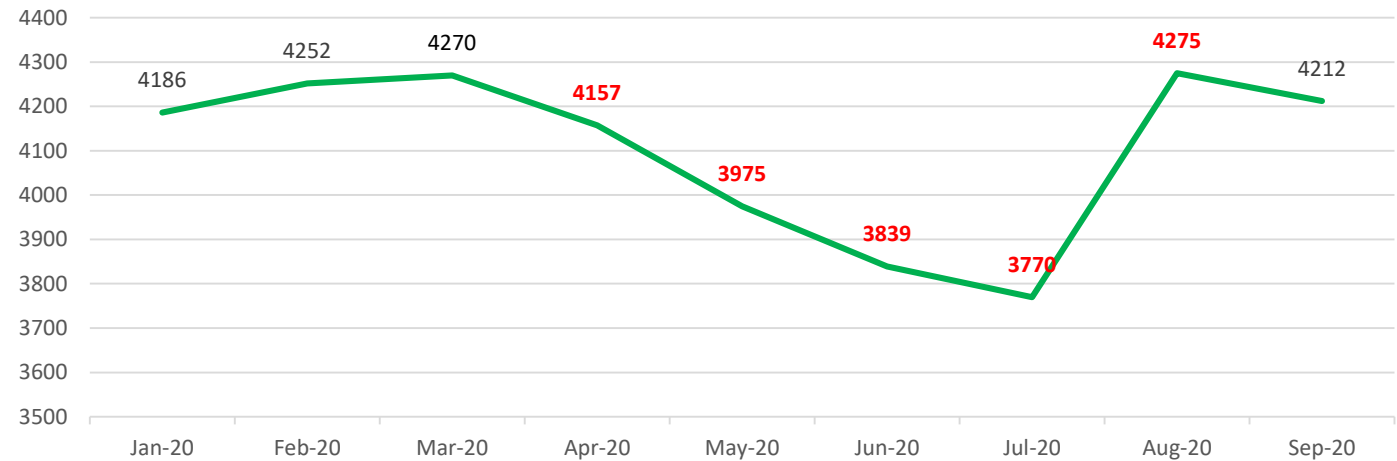
- OMC Strategies-Implemented
 - Worked with DOT to mail renewed cards, and schedule visits for new card issuance
 - Provided waiver for curbside delivery at dispensaries
 - Recommended telemedicine and referrals

- Due to social distancing of a compromised patient population, lack of access to healthcare providers, and decreased access to the DOT to have their card made, issued patient cards dropped steeply in April

- Highest average transaction price throughout lifespan of the program

- When these issues were minimized in July, issued cards rebounded

Total Active Patient Cardholders: 2020

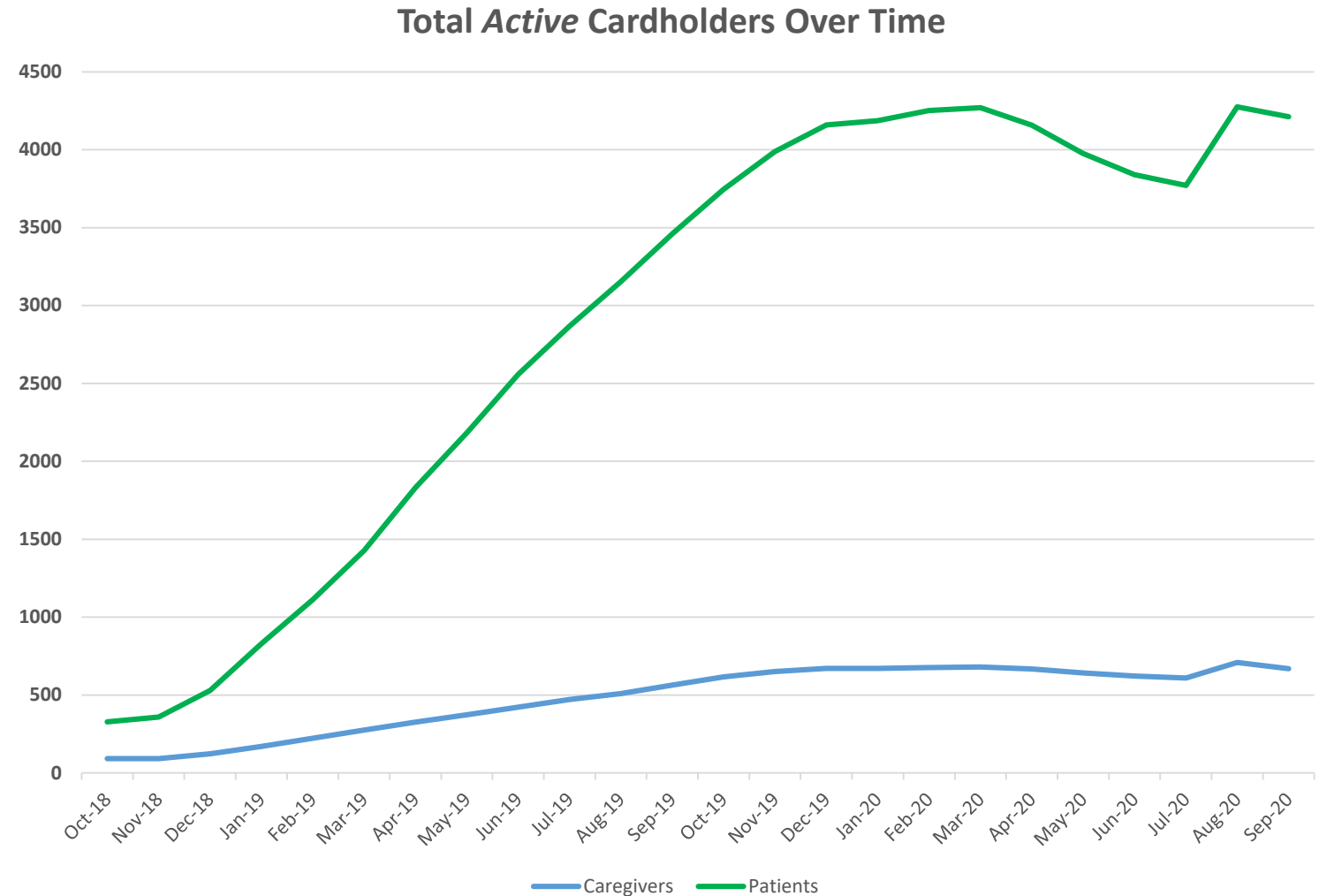


Average Transaction Price



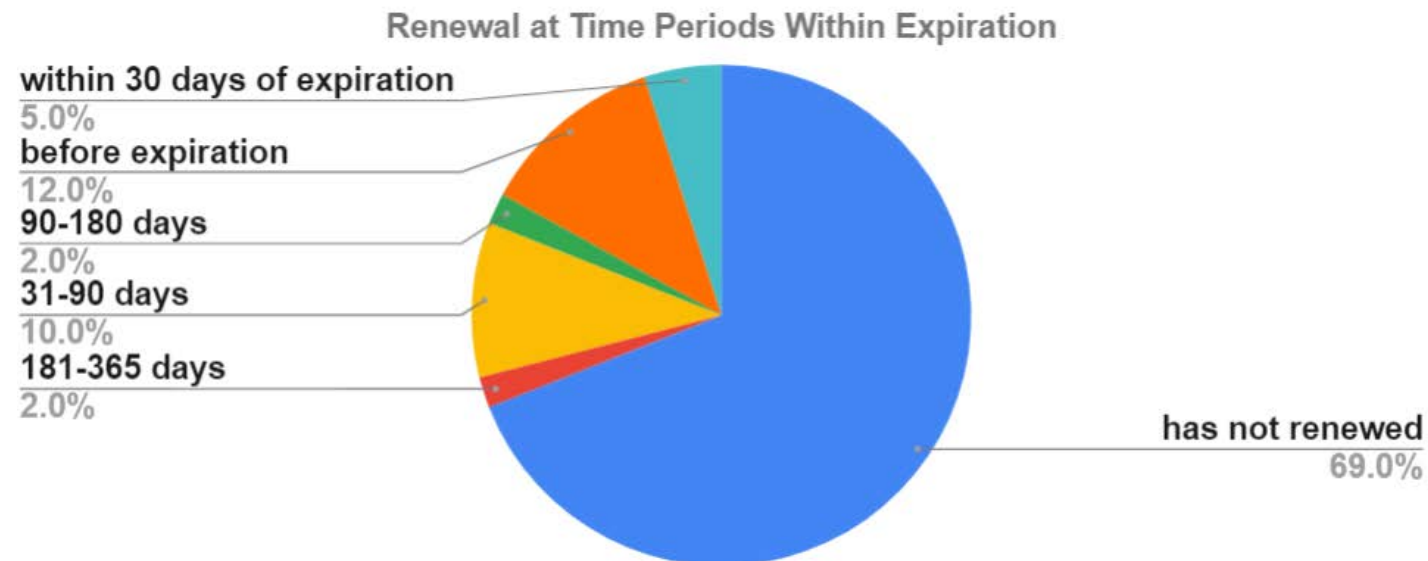
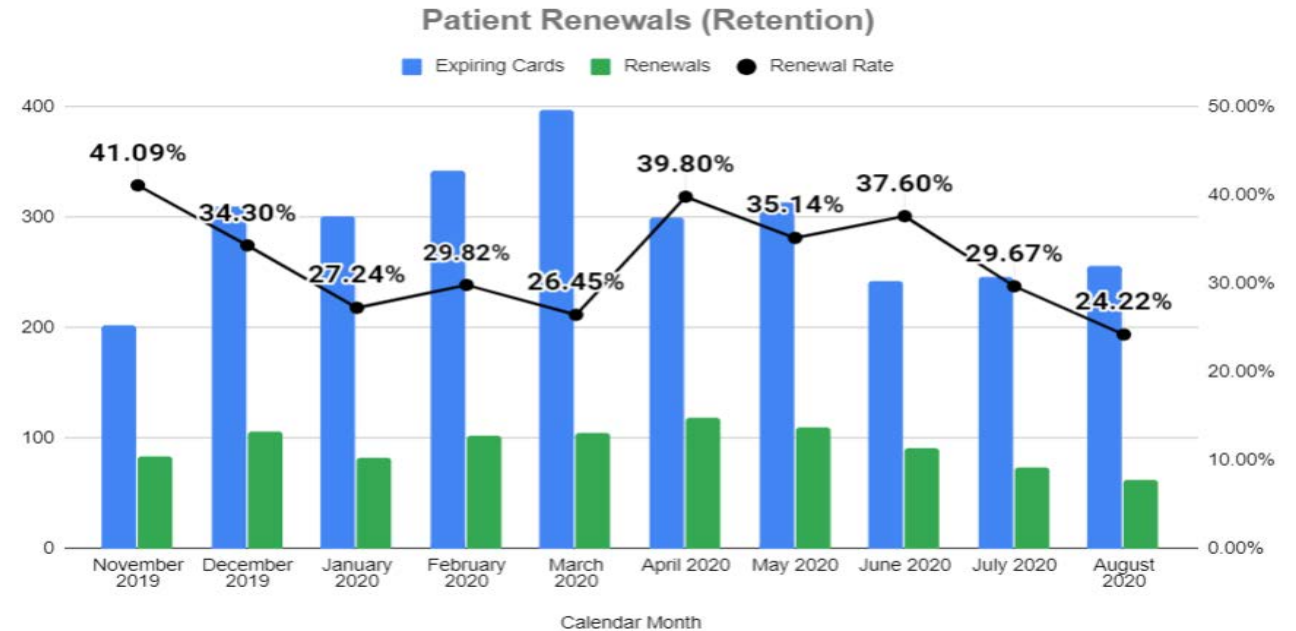
Data Update: *Active Cards Over Time*

- During the first year of the program, while the ability to renew was not at play, we saw progressive linear adoption
- In November, 2019, when the majority of patient cards began to come up for renewal, we have essentially seen our active patient population plateau
- Anecdotal explanations for this have been well-documented, but an observational study to determine the qualitative nature of this is necessary



Data Update: Patient Renewal Data

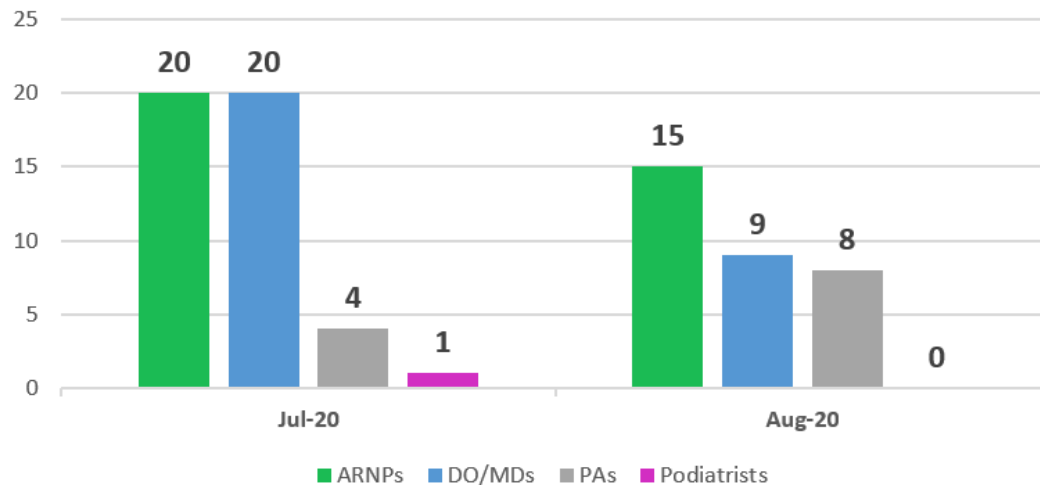
- The OMC tracks the number of cards expiring each month as compared to the number of renewal applications
- IDPH also tracks patient renewals at different time periods within card expiration
- Renewals and patient retention are a key metric in determining program efficacy



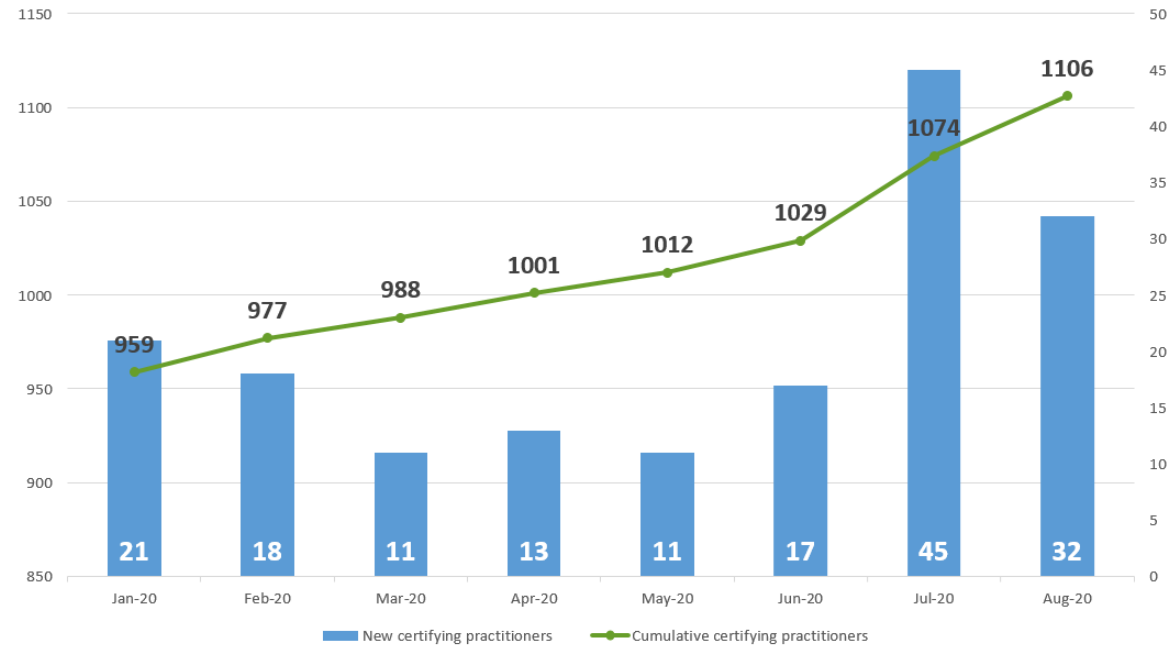
Data Update: Provider Adoption

- There continues to be new providers each month certifying their first unique patient
- Iowa's program maintains a patient to provider ratio of **3.8:1**, which is conservative in comparison to other programs

Post-HF2589 Healthcare Practitioner Adoption



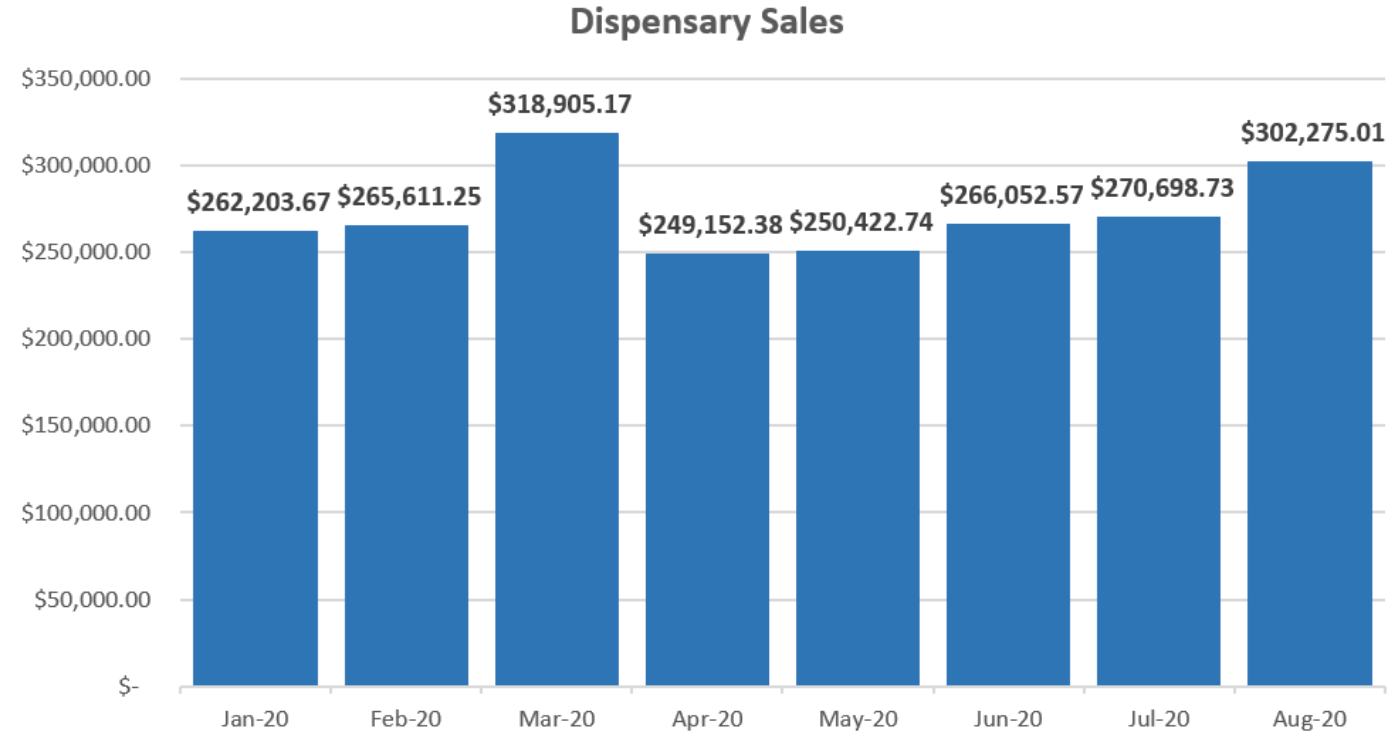
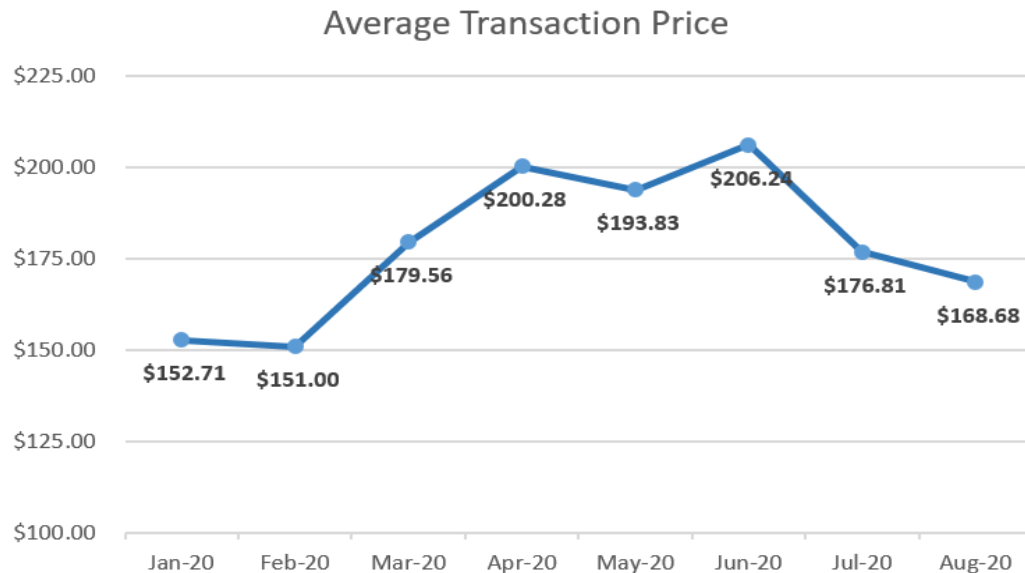
New and Cumulative Certifying Practitioners by Month



- HF2589 added new healthcare disciplines to the definition of healthcare practitioner, and we have seen practitioners from all disciplines participate since July 1, 2020

Data Update: Dispensary Sales

- Dispensary sales have continued to be steady during 2020
- While issued patient cards dropped steeply during onset of COVID-19, sales did not necessarily follow suit



- Average transaction price through the lifespan of the program = \$160.34



Protecting and Improving
the Health of Iowans

Thank You.

Questions?

Owen Parker, MPH
Program Manager
Office of Medical Cannabidiol