

**SB – 1561: This comment concerns which licensed healthcare providers can make medical marijuana recommendations in Oregon.**

As a 5+ year OMMP participant and a public health professional, I support, with the modifications noted below, the section within SB1561 that expands the list of providers who can make medical marijuana recommendations. The current OMMP requirement that only physicians (MD and DO) can recommend cannabis for medical use and eligibility in OMMP is overly restrictive and hence stigmatizing. Consequently, most patients, like me, have had to seek the specialized medical cannabis clinics to get the required paperwork signed because our actual providers are not authorized to make this recommendation. However, the bill language does not go far enough to include all Oregon prescribing providers. I strongly recommend that any bill requiring a specialized, licensed healthcare professional to certify medical marijuana eligibility, should be inclusive of all Oregon licensed prescribers. Otherwise if this over-the-counter (adult use market) substance is treated more restrictively than other controlled substances, it just perpetuates cannabis stigma.

I recommend lawmakers follow the list maintained by the Oregon Board of Pharmacy, at this web location: <https://www.oregon.gov/pharmacy/imports/prescribers.pdf>

Upwards of a third of all patient encounters in Oregon that involve the prescribing of medications are by non-physician providers, based on licensing board data. In many Oregon counties, more than a half of all primary care is delivered by advanced practice nurses. Although Nurse Practitioners (NPs) are listed in the current draft of the bill, Oregon licenses several advanced practice registered nurses (APRN) specialties other than NPs. All APRNs in Oregon that have full, unrestricted DEA prescribing privileges should be included as qualified providers to make medical marijuana recommendations.

Similarly, optometrists manage and prescribe medications for glaucoma, a qualifying condition for access to medical marijuana. As a glaucoma patient, my care for years was provided by a Doctor of Optometry. This healthcare professional, with specialized post-doctoral training in glaucoma management, still could not manage my care under the reformed bill in session. Fortunately, my ophthalmologist (MD) now signs my permission slip, but this too adds to overall healthcare costs.

They should also be included in the expanded provider list.

*Who prescribes DEA-controlled medications for people in Oregon?*

[Key: \* is from formulary. @ is under physician supervision. # is within restricted scope. Physicians and APRNs prescribe in Oregon without restrictions.]

Dentist # (DDM or DDS), Doctor of Medicine (MD), Doctor of Osteopathy (DO), Naturopathic Physician \* (ND), Nurse Practitioner (APRN-NP), Nurse Practitioner Midwife (APRN-NPM), Nurse Specialist (APRN-CNS), Optometrist # (OD), Physician Assistant @ (PA), and Podiatrist # (DP). Please amend HB 2722 and advance this bill for passage in the legislature.

Please modify to expand healthcare access through the full range of prescribing providers licensed to treat the people of Oregon.

Thank you for your consideration of my suggested modifications.

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