

GreenLife Medical Systems LLC

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Council Members,

Thank you for the opportunity to speak here today. My name is Alain Gazau and I am the Director of GreenLife Medical Systems. We make software specifically designed for medical cannabis professionals, both physicians and collectives. Our software is built with the intention of bringing accountability and standardization to this emerging market. I would like to say a few words about CF 08-0923, the City's Proposed Medical Marijuana Ordinance.

Under Sec. 46.64 b. #3, Operational Requirements, section d. states, "Cooperative/Collective shall verify that each patient has a valid, state issued ID Card or, alternatively, shall verify each patient's physician prior to dispensing initially and at least every six months." We feel this passage needs some clarification. In the first half of the sentence, are we talking about verifying that the patient is a valid recommendation holder or that the patient is a resident of California? Given that "alternatively" is used, it would seem to suggest that it is to verify the patient as a valid recommendation holder. In the second half of the sentence, it seems that the word "with" may be missing after "shall verify". We feel the intention of section d. was to allow collectives to use the State approved Medical Marijuana Program card, if the patient has one, as sufficient to meet both the requirement of California residency AND the status of their recommendation. The State Program is voluntary, and as such, a patient may not have one of these cards. The second half of section d. was to allow the collectives to dispense medication to this patient, given that they verify California residency as well as the validity of the recommendation from the physician. This notion is present in the Guidelines written by Attorney General Brown in 2008 (in Section B. #3, Membership Application and Verification). We suggest rewording Sec. 46.64 b. #3 Operational Requirements sub-section d. to read,

"Cooperative/Collective shall verify the individual as a qualified patient or primary caregiver. Unless the patient presents a valid, state approved Medical Marijuana Program card, the verification process should include both validating California residency, and verifying the patient status with the recommending physician (or appointed agent) prior to dispensing initially, and every time a new recommendation has been presented. In addition, Cooperative/Collective shall verify once every six month, the Medical Board licensing status of all the recommending physicians for patients on file within the Collective/Cooperative."

Under Sec. 46.64 b. #3, Operational Requirements, section l. states "Cooperative/Collective staff shall maintain patient records on-site, including, but not limited to, a copy of any State ID Card issued pursuant to California Health and Safety Code Sections 11362.7 through 11362.83, inclusive, the physician's Written Recommendation (required only if no State issued ID Card), and, if using a Primary Caregiver, a notarized written authorization from the patient to be represented by the said Primary Caregiver.

Medical records are very important to patient care and maintaining these records are critical to patient privacy and confidentiality. We feel this section should reflect best practices in this regard. We suggest reworking Sec. 46.64 b. #3, section l. to read;

"Cooperative/Collective staff shall maintain patient records in a manner consistent and compliant with industry standards for medical data, including HIPAA and other related privacy codes. Patient records should include, but not be limited to, a copy of any State ID Card issued pursuant to California Health and Safety Code Sections etc....."

We feel legislation of this kind is lacking throughout the state and is necessary to further assert this industry as a medical specialty. We applaud the City of Los Angeles for its efforts and hope that a positive outcome will influence other cities as well.

Thank you.

Alain Gazau
Director
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