



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904
302-739-4553 (voice) 302-739-6126 (fax) <http://www.gacec.delaware.gov>

September 30, 2020

Alanna Mozeik
Division of Public Health
417 Federal Street
Dover, DE 19901

RE: 24 DE Reg. 258 [DHSS/DPH Proposed Delaware Medical Marijuana Code Revisions Regulation (December 1, 2019)]

Dear Ms. Mozeik:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Delaware Office of Medical Marijuana, Division of Public Health (DPH) and Department of Health and Social Services (DHSS) proposal to amend the State of Delaware Medical Marijuana Code. The revisions include the establishment of a Cannabidiol-Rich (CBD-Rich) registry identification card, requirements for CBD-Rich medical marijuana profile concentrations, regulations for home delivery services, the addition of anxiety to the list of qualifying conditions (restricted to CBD-Rich cards) and technical changes. Council would like to share the following questions and concerns on the proposed amendments.

Additional background on this regulation, including its potential impact on the current availability of CBD Oil commercially outside of the medical marijuana context would be greatly appreciated. Does the Substance Abuse and Mental Health Services Administration (SAMHSA) restriction on funding for programs that advocate or supply medicinal marijuana to anyone as treatment for a mental health or substance abuse disorder have any bearing on the addition of anxiety as a qualifying condition?

Thank you for this opportunity to share our request for information with you. Please contact me or Wendy Strauss at the GACEC office if you have any questions.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc