

January 28, 2017

Implementing Pennsylvania's Medical Marijuana Program



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Act 16 Overview

- 17 qualifying conditions including severe, chronic, or intractable pain; PTSD; and autism.
- Certifying physicians must issue an in-person recommendation, register with the Department of Health, and complete a 4-hour course, which is still being developed.
- The Department can establish a maximum price for a period of six months if prices are too high.
- No access for out-of-state patients.
- Legal protections are provided for patients, caregivers, and businesses.
 - Safe Harbor letters are available and create legal protections for minor patients.
 - Adult patients will not have protections until issuance of registration cards.
- Portions of the law related to dispensaries will expire three years after the federal government completes rescheduling of marijuana.

Usage Limitations



- The only types of medical cannabis allowed initially are pills, oils, gels, creams, ointments, tinctures, liquid, and non-whole plant forms for administration through vaporization.
- Dispensaries cannot sell edibles, but medical cannabis products can be mixed into food or drinks to facilitate ingestion by a patient in a facility or residence.
- Vaporization is allowed.
- Smoking is prohibited.
- Following the issuance of the advisory board's report, the Department of Health could promulgate a rule that would allow patients access to dry leaf cannabis and edibles.
- Dispensaries will be required to offer a minimum number of products and types of products, as determined by the Department.

Implementation Timeline



- May 17, 2016: Act 16 goes into effect
- October 29, 2016: DOH releases temporary regulations for grower/processors
- December 10, 2016: DOH releases temporary dispensary regulations
- January 17, 2017: DOH releases applications for grower/processors and dispensaries
- February 8, 2017: Final day to submit questions to DOH (ra-dhq4app@pa.gov). Answers will be published on DOH MMJ page.
- February 20, 2017: DOH begins accepting applications
- March 20, 2017: Last day to submit applications
- June 18/20: Phase 1 permit recipients announced
- May 17, 2018: Advisory board report deadline, DOH begins to promulgate permanent regulations

Temporary Regulations: General Disclosure/Confidentiality



The following information is considered confidential, is not subject to the Right-to-Know Law, and will not otherwise be released to a person unless pursuant to court order:

- Information in the possession of the Department or any of its contractors regarding a practitioner's registration information that is not listed as a public record under subsection (a).
- The name or other personal identifying information of a patient or caregiver who applies for or is issued an identification card.
- Individual identifying information concerning a patient or caregiver, or both.
- A certification issued by a practitioner.
- Any information on an identification card.
- Information provided by the Pennsylvania State Police regarding a caregiver, including criminal history record information, as set forth in § 1141.31 (relating to background checks).
- Information regarding a patient's serious medical condition.
- Other information regarding a patient, caregiver, practitioner, or medical marijuana organization not listed in subsection (a) that falls within an exception to the Right-to-Know Law, or is otherwise considered to be confidential proprietary information by other law.
- Information regarding the physical features of, and security measures installed in, a facility.

Temporary Regulations: General Permit Limits



Maximum 25 permits for grower/processor permits.

- One person → one permit.
- Maximum of 5 dispensary permits → individual growers/processors.
- If the Department adds more grower/processor licenses, no more than 20% of those permits can also have a dispensary permit.

Maximum 50 dispensary permits.

- Maximum 5 permits for one person.
- Maximum three locations per permit.
- First location must be in a designated county, additional locations must be in other counties inside the same region.



Temporary Regulations: General

Permits cannot be...

- Transferred. Permits will be issued to a specific location and person.
- Located anywhere that DOH agents or law enforcement access would be limited, such as a personal residence.
- A site or facility located on lands owned by the United States or the Commonwealth.

Temporary Regulations: General

Types of Applications



- Initial permit application: Grower/Processor or Dispensary
- A permit renewal application: Needed annually
- An application for approval of a change in ownership of a medical marijuana organization authorized by a permit.
- An application for approval of a change of location of a facility authorized by a permit.
- An application for approval of alteration of a facility authorized by a permit.

Temporary Regulations: General Fees



All fees shall be paid by certified check to the Department.

- Grower /Processor
 - Application: \$10,000. Non-refundable.
 - Permit fee: \$200,000. Submitted w/ application, refunded if permit is denied.
 - Renewal fee: \$10,000.
- Dispensary
 - Application: \$5,000. Non-refundable.
 - Permit fee: \$30,000 per location. Submitted w/ application, refunded if permit is denied.
 - Renewal fee: \$5,000.
- \$250 fee for:
 - Change of ownership
 - Change of location
 - Alteration of facility



Temporary Regulations: General

Initial Permit Application

<input type="checkbox"/> Application Form	<input type="checkbox"/> Signature Page (Attachment A)
<input type="checkbox"/> Initial Application fee (\$5000/\$10,000)	<input type="checkbox"/> Permit Fee (\$30,000/\$200,000)
<input type="checkbox"/> Organizational Documents	<input type="checkbox"/> Property title/lease/ option to acquire
<input type="checkbox"/> Site and facility plan	<input type="checkbox"/> Personal identification
<input type="checkbox"/> Affidavit of business history	<input type="checkbox"/> Affidavit of criminal offense
<input type="checkbox"/> Tax clearance certificates	<input type="checkbox"/> Affidavit Capital Sufficiency
<input type="checkbox"/> Sample label	<input type="checkbox"/> Release Authorization
<input type="checkbox"/> Application priorities for multiple applications	<input type="checkbox"/> Background checks

Temporary Regulations: General Capital Requirements



Applicants will provide an affidavit that...

- Grower/processor applicant has at least \$2 million in capital, \$500,000 of which must be on deposit with one or more financial institutions.
- Dispensary applicant has at least \$150,000 on deposit with one or more financial institutions.

An applicant will also submit a release allowing the Department to contact each financial institution listed in the application to verify the information provided.

Temporary Regulations: Background Checks



Applicants must submit fingerprints to the Pennsylvania State Police for:

- Principals
- Financial backers
- Operators
- Employees

Anyone convicted of a criminal offense relating to the sale or possession of illegal drugs, narcotics, or controlled substances is prohibited from being a financial backer, principal, or employee.

If you are unable to complete the background check in time, you will be given time to supplement your application with the results of that background check.

Temporary Regulations: Duty to Report



During application process or permit period you must report:

- Any change in fact or circumstances that would have been included in the application.
- Any proposed modifications at least 30 days in advance.
- Any loss from facility or vehicle within 24 hours.
- Discontinuance of operations.
- Removal of all products from the facility by either state or federal authorities.

Temporary Regulations: Reporting Requirements



Within one year of the issuance of the first permit and every three months thereafter, all businesses must submit the following information to the Department:

- The amount of medical marijuana sold by growers/processors during each three-month period;
- The price of amounts of medical marijuana sold by growers/processors as determined by the Department;
- The amount of medical marijuana purchased by each dispensary in the Commonwealth;
- The cost of amounts of medical marijuana to each dispensary as determined by the Department; and
- The total amount and dollar value of medical marijuana sold by each dispensary in each three-month period.

* This information will be made public on the Department website.

* All records must be kept for four years.

Temporary Regulations: General Penalties and Sanctions



- Impose a civil penalty up to \$10,000 and no more than \$1000 for each day of continuing violation.
- Order restitution of funds or property
- Issue a cease and desist order
- Suspend or revoke a permit if MMO ...
 - Fails to effectively prevent diversion.
 - Violates Act 16.
 - Violates other state or local laws.
 - Anything occurs that would have disqualified MMO from permit

Temporary Regulations: Training



All principals and employees who handle marijuana or have direct contact with patients must complete a 2-hour course developed by DOH that will cover:

• Act 16	• Proper handling of MMJ
• Preventing and Detecting Diversion	• Security
• Medical emergencies	• Fire
• Threatening events	• Record keeping
• Chemical spills	

Temporary Regulations:

Zoning



Growers/Processors must meet the same municipal and land use requirements as other manufacturing, processing, and production facilities in the zoning district.

Dispensaries must meet the same municipal and land use requirements as other commercial facilities in the zoning district. Dispensaries cannot operate within 1000 ft. of a public or private school, or a day care center. If the Department discovers this prohibition is impeding patient access, it may issue a waiver, which may come with additional security requirements.

Temporary Regulations: Advertising



Must follow federal law guiding prescription drug advertising (21 CFR 202.1).

Promotional, advertising, and marketing materials shall be approved by the Department prior to their use.

- This does not apply to information provided by growers/processors to dispensaries.

Temporary Regulations: Grower/Processors Plans of Operation



To be considered operational a permit holder must have a plan for:

- Employment policies and procedures
- Security policies and protocols
- A process for growing, receiving, processing, packaging, labeling, handling, tracking, transporting, storing, disposing and recalling of medical marijuana and a process for handling, tracking, transporting, storing and disposing of medical marijuana waste in accordance with applicable laws, rules and regulations.
- Workplace safety, including conducting necessary safety checks prior to starting the growing and processing of medical marijuana.
- Contamination protocols.
- Maintenance, cleaning and sanitation of equipment in facility and site.
- Proper handling and storage of any solvent, gas or other chemical used in growing or processing medical marijuana in accordance with this part and other applicable laws, rules and regulations.
- Quality control, including regulation of the amount of THC in each lot and minimization of medical marijuana contamination.
- Inventory maintenance and reporting procedures.
- The investigation of complaints from dispensaries, patients, caregivers or practitioners regarding the operation of the grower/processor.
- A recall plan meeting the requirements of § 1151.42(d) (relating to complaints about or recall of medical marijuana).
- A grower/processor shall make the full and complete plan of operation available to the Department upon request and during an inspection of the site and facility.

Temporary Regulations: Grower/Processors Facility Requirements



- A grower/processor may only grow, store, harvest, or process medical marijuana in an indoor, enclosed, secure facility approved by the Department.
- The following areas of a facility must be clearly marked with proper signage:
 - Medical marijuana growing and processing areas. These areas shall be easily observed by the Department and its authorized agents, and by law enforcement.
 - Non-growing and non-processing areas.
 - Limited access areas. All areas of ingress and egress to a limited access area must be clearly identified by the posting of a sign which must be not less than 12 inches wide and 12 inches long, composed of letters not less than 1/2 inch in height, which must state:
 - Do Not Enter — Limited Access Area — Access Limited to Authorized Personnel and Escorted Visitors
 - Areas that include business offices and reception rooms.
- A facility shall have an enclosed secure area out of public sight for the loading and unloading of medical marijuana into and from a transport vehicle.

Temporary Regulations: Grower/Processors Start up Inventory



- A grower/processor may obtain seeds or immature medical marijuana plants from outside of this Commonwealth for the purpose of securing its start-up inventory. Seeds or immature medical marijuana plants obtained from outside of this Commonwealth shall be obtained within 30 days from the date that the Department determines that the grower/processor is operational.
- A grower/processor may not obtain medical marijuana plants from outside of this Commonwealth at any time.
- A grower/processor shall, within 24 hours of receipt, record in the electronic tracking system each seed and immature medical marijuana plant that enters the site during the 30-day period under subsection (a).
- After the 30-day period in subsection (a), a grower/processor shall only grow medical marijuana plants from seeds or immature medical marijuana plants located physically in its facility, or purchase seeds, immature medical marijuana plants, or medical marijuana plants from another grower/processor.

Temporary Regulations: Grower/Processors Security and Surveillance



The security and surveillance systems must include:

A professionally-monitored security alarm system that includes the following:

- Coverage of all facility entrances and exits; rooms with exterior windows, exterior walls, roof hatches, or skylights; storage rooms, including those that contain safes; and the perimeter of the facility.
- A silent security alarm system signal
- An audible security alarm system signal
- An electrical, electronic, mechanical, or other device capable of being programmed to send a pre-recorded voice message requesting dispatch, when activated, over a telephone line, radio, or other communication system to a law enforcement, public safety, or emergency services agency.
- A failure notification system that provides an audible, text, or visual notification of any failure in the systems.
- A smoke and fire alarm.
- Auxiliary power sufficient to maintain operation of specified growing and processing areas identified in the grower/processor's plan of operation for at least 48 hours following a power outage.
- The ability to ensure all access doors are not solely controlled by an electronic access panel to prevent locks from becoming released during a power outage.
- Motion detectors.

Temporary Regulations: Grower/Processors

Security and Surveillance



- A professionally-monitored security and surveillance system that records all activity in images capable of clearly revealing facial detail. The security and surveillance system must include the following:
 - Fixed camera placement that allows for a clear image of all individuals and activities in and around the following:
 - A limited access area of the facility.
 - A room or area containing a security and surveillance system storage device or equipment.
 - Entrances and exits to the facility. Entrances and exits must be recorded from indoor and outdoor vantage points.
 - Rooms with exterior windows, exterior walls, roof hatches, or skylights and storage rooms, including those that may contain safes.
 - Twenty feet from the exterior of the perimeter of the facility.
 - Auxiliary power sufficient to maintain operation for at least 48 hours following a power outage.
 - The ability to operate under the normal lighting conditions of each area under surveillance.
 - The ability to immediately produce a clear, color, still photograph in a digital format that meets the requirements of this subsection.

Temporary Regulations: Grower/Processors Security and Surveillance



- The ability to clearly and accurately display the date and time. The date and time must be synchronized and set correctly and may not significantly obscure the picture.
- The video surveillance must be monitored at all times by an agent of the facility.
- The ability to record all images captured by each surveillance camera for a minimum of 4 years in a format that may be easily accessed for investigative purposes. The recordings must be kept:
 - At the facility:
 - In a locked cabinet, closet, or other secure place to protect it from tampering or theft.
 - In a room to which access is limited to authorized individuals and secured by a security alarm system separate from the site's primary security system.
 - At a location other than the location of the facility if approved by the Department.

Temporary Regulations: Grower/Processors Security and Surveillance



Consult the regulations for more details on:

- Inspections
- Record retention
- Security and surveillance systems: malfunctions, maintenance, and alterations.

Temporary Regulations: Grower/Processors Requirements



- Must comply with regulations for pesticides, fungicides, and herbicides that are approved by the Department of Agriculture and in accordance with federal law;
- Maintain a log of detection measures;
- Use appropriate nutrient practices;
- Use a fertilizer or hydroponic solution of a type, formulation, and at a rate to support healthy growth of plants;
- Properly treat and dispose of the wastewater generated from the growing and processing of medical marijuana;
- Maintain records of the type and amounts of fertilizer and any growth additives used;

Temporary Regulations: Grower/Processors Requirements



- Perform visual inspections of growing plants and harvested plant material to ensure there is no visible mold, mildew, pests, rot, or grey or black plant material that is greater than an acceptable level as determined by the Department;
- May not add any additional active ingredients or materials to medical marijuana without the prior written approval of the Department; and
- Have a separate and secure area for temporary storage of medical marijuana that is awaiting disposal;
- Shall only process the parts of the medical marijuana plant that are free of seeds and stems, dirt, sand, and debris, and contains a level of mold, rot, or other fungus or bacterial disease acceptable to the Department;
- Shall process the medical marijuana plants in a safe and sanitary manner; and
- A grower/processor shall install a system to monitor, record, and regulate temperature, humidity, ventilation, lighting, and water supply.

Temporary Regulations: Grower/Processors Limits



In the form intended to be sold to another medical marijuana organization, medical marijuana must have a specific concentration of total THC and total CBD and must have a consistent cannabinoid profile. The concentration of the following cannabinoids, at a minimum, shall be reported to the Department by the laboratory and include the following on the label:

- Tetrahydrocannabinol (THC)
- Tetrahydrocannabinol acid (THCA)
- Tetrahydrocannabivarin (THCV)
- Cannabidiol (CBD)
- Cannabinadiolic acid (CBDA)
- Cannabidivarin (CBDV)
- Cannabinol (CBN)
- Cannabigerol (CBG)
- Cannabichromene (CBC)
- Any other cannabinoid component at > 0.1%

Within the first 6 months after the Department determines the grower/processor to be operational, the grower/processor shall provide the Department with a forecast of the amount of medical marijuana it projects it will produce and in what form. The grower/processor shall notify the Department in writing immediately upon becoming aware of a potential increase or decrease in the forecasted amount occurring within any subsequent 6-month period.

Temporary Regulations: Grower/Processors Inventory



A grower/processor shall maintain an inventory in an electronic tracking system which must include an accounting of and an identifying tracking number for:

- The number, weight, and type of seeds.
- The number of immature medical marijuana plants.
- The number of medical marijuana plants.
- The number of medical marijuana products ready for sale.
- The number of damaged, defective, expired, or contaminated seeds, immature medical marijuana plants, medical marijuana plants, and medical marijuana products awaiting disposal.

Temporary Regulations: Grower/Processors Inventory



A grower/processor shall establish inventory controls and procedures to conduct inventory reviews and comprehensive inventories at the facility. The following apply:

- Inventory reviews of medical marijuana plants in the process of growing and medical marijuana that is being stored for future sale shall be conducted monthly.
- Comprehensive inventories of seeds, immature medical marijuana plants, medical marijuana plants, and medical marijuana shall be conducted at least annually.

A written or electronic record shall be created and maintained of each inventory conducted under subsection (b) that includes the date of the inventory; a summary of the inventory findings; and the names, signatures, and titles or positions of the individuals who conducted the inventory.

Temporary Regulations: Grower/Processors Storage Requirements



- Separate locked areas for storage of seeds; immature medical marijuana plants; medical marijuana plants; and medical marijuana that are expired, damaged, deteriorated, mislabeled, or contaminated; or whose containers or packaging have been opened or breached until the seeds, immature medical marijuana plants, medical marijuana plants, and medical marijuana are disposed of as required under § 1151.40.
- Maintain storage areas in a clean and orderly condition that are free from infestation by insects, rodents, birds, and pests of any kind.

Temporary Regulations: Grower/Processors Equipment, operation and maintenance



A grower/processor facility shall have a written process in place to maintain the sanitation and operation of equipment that comes into contact with medical marijuana to prevent contamination. The grower/processor shall provide a copy of the written process to the Department upon request.

As part of the written process required under subsection (a), a grower/processor shall:

- Routinely calibrate, check, and inspect the following to ensure accuracy:
 - Automatic, mechanical, or electronic equipment.
 - Scales, balances, or other measurement devices used in the grower/processor's operations.
- Maintain an accurate log recording the following:
 - Maintenance of equipment.
 - Cleaning of equipment.
 - Calibration of equipment.

Temporary Regulations: Grower/Processors

Sanitation and Safety



A grower/processor shall maintain a facility in a sanitary condition to limit the potential for contamination or adulteration of the medical marijuana grown and processed in the facility. The following apply:

- Equipment and surfaces, including floors, counters, walls, and ceilings, shall be cleaned and sanitized as frequently as necessary to protect against contamination, using a sanitizing agent registered by the United States Environmental Protection Agency, in accordance with the instructions printed on the label. Equipment and utensils shall be so designed and of such material and workmanship as to be capable of being adequately cleaned.
- Litter and waste shall be properly disposed of, and the systems for waste disposal shall be maintained in good working condition to prevent the litter and waste from becoming a source of contamination in areas in which immature medical marijuana plants, medical marijuana plants, or medical marijuana are exposed.
- Floors, walls, and ceilings shall be kept in good repair.
- Equipment, counters, and surfaces for processing must be food-grade quality and may not react adversely with any solvent being used.
- Adequate protection against pests shall be provided through the use of integrated pest management practices, techniques that identify and manage plant pathogens and pest problems, and the regular disposal of litter and waste to prevent infestation.
- Toxic cleaning compounds, sanitizing agents, solvents used in the growing and processing of medical marijuana, and pesticide chemicals must be labeled and stored in a manner that prevents contamination of seeds, immature medical marijuana plants, medical marijuana plants, and medical marijuana, and in a manner that otherwise complies with other applicable laws and regulations.

Temporary Regulations: Grower/Processors

Sanitation and Safety



- A grower/processor shall ensure that the facility is provided with a water supply sufficient for its operations, which shall be derived from a source that is a public water system, or a nonpublic system that is capable of providing a safe, potable, and adequate supply of water to meet the operational needs of the facility.
- An employee working in direct contact with medical marijuana is subject to the restrictions on food handlers in § 27.153 (relating to restrictions on food handlers). An employee shall otherwise conform to sanitary practices while on duty, including:
 - Maintaining adequate personal cleanliness.
 - Wearing proper clothing, including gloves.
 - Washing hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated.

Temporary Regulations: Grower/Processors

Sanitation and Safety



- A grower/processor shall provide its employees and visitors with adequate and convenient hand-washing facilities furnished with running water at a suitable temperature. The following apply:
 - Hand-washing facilities must be located in processing areas and other places where employees may need to wash and sanitize their hands.
 - Effective hand-cleaning and sanitizing preparations and sanitary towel service or suitable drying devices shall be provided.
- A grower/processor shall provide its employees and visitors with adequate, readily accessible lavatories that are maintained in a sanitary condition and in good repair.

Temporary Regulations: Grower/Processors Packaging and Labeling



- Packaging and labeling will take place at the facility. The original seal of a package may not be broken, except for testing or investigations.
- Medical marijuana must be in a package that minimizes exposure to oxygen, and it must also be child-proof, tamper-proof or tamper-evident, light resistant, opaque, and re-sealable.
- Each lot must have a unique identifier.
- Labels must be Department-approved by DOH and contain warning language.

Temporary Regulations: Grower/Processors General



Refer to regulations for more details on:

- Electronic tracking systems
- Disposal of unused marijuana
- Addressing complaints about contamination
- Guidance on pesticides
- Transportation (also see slide 44: Temporary Regulations: Dispensaries Transportation)
- Treatments and quarantines

Temporary Regulations: Dispensaries

General



- Must maintain qualifications required for permit
- No employees under 18
- No MMJ use on premises (except for employee patients)
- Must have a medical doctor or a pharmacist on-site at all times when patients/caregivers can access the facility
- If there are multiple locations, physician assistant or a registered nurse practitioner shall meet the requirement

Temporary Regulations: Dispensaries

Dispensing



Dispensary must...

- Verify cardholder identity and review certifications.
- Follow any restrictions included in the certification.
- If no restrictions are provided, the cardholder must consult with the on-site medical professional.
- File a receipt with the Department and then destroy any information from the receipt from internal network.

Temporary Regulations: Dispensaries Facilities



Must be an indoor, enclosed, secure facility.

Cannot be located:

- Within 1,000 feet of the property line of a public, private, or parochial school, or a day care center.
- At the same site used for growing and processing medical marijuana.
- In the same office space as a practitioner or other physician.
- The Department may waive or amend these prohibitions if necessary to ensure patient access, but may require additional security.

No one under 18 years of age is permitted to enter a dispensary unless the individual is a patient or accompanied by a parent, guardian, or caregiver.

- If a dispensary facility is located adjacent to a commercial operation, the facility shall provide additional means of security satisfactory to the Department to prevent individuals under 18 years of age from entering the facility from the commercial operation unless the individual is accompanied by an adult.

A dispensary must have an enclosed, secure area out of public sight for the loading and unloading of medical marijuana into and from a transport vehicle.

Temporary Regulations: Dispensaries

Items and Services



Dispensaries may sell...

- Medical marijuana purchased from permitted growers/processors.
- Instruments, devices, and services related to medical marijuana, with Department approval.
- Hemp/ CBD products, produced by permitted growers/processors, with Department approval.

Temporary Regulations: Dispensaries

Prohibited Activities



Advertising medical marijuana:

- As a promotional item
- As part of a give away
- As part of a coupon program

Providing medical marijuana at no cost or for free, unless the patient is approved for financial assistance by the Department

Make the dispensing of medical marijuana to a patient or caregiver conditional upon another purchase

Offer the delivery of or deliver medical marijuana to a patient or caregiver at the patient's or caregiver's home or any other location

Temporary Regulations: Dispensaries Transportation



May deliver only between 7 a.m. and 9 p.m.

Must notify the Department of its delivery schedule

May use a contractor

Vehicles must have

- A secure cargo area
- No marijuana-related markings
- Temperature control
- Current state inspection and registration stickers displayed
- At least two employees, one of whom will stay with the vehicle at all times

Temporary Regulations: Dispensaries



Refer to regulations for additional information on:

- Labeling and safety inserts
- Security and surveillance requirements (similar to growers/processors)
- Visitor access
- Storage requirements
- Sanitation and safety

Medical Marijuana Regions



Phase 1

6 Medical Marijuana Regions

12 grower/processor permits

- 2 per zone

27 dispensary permits

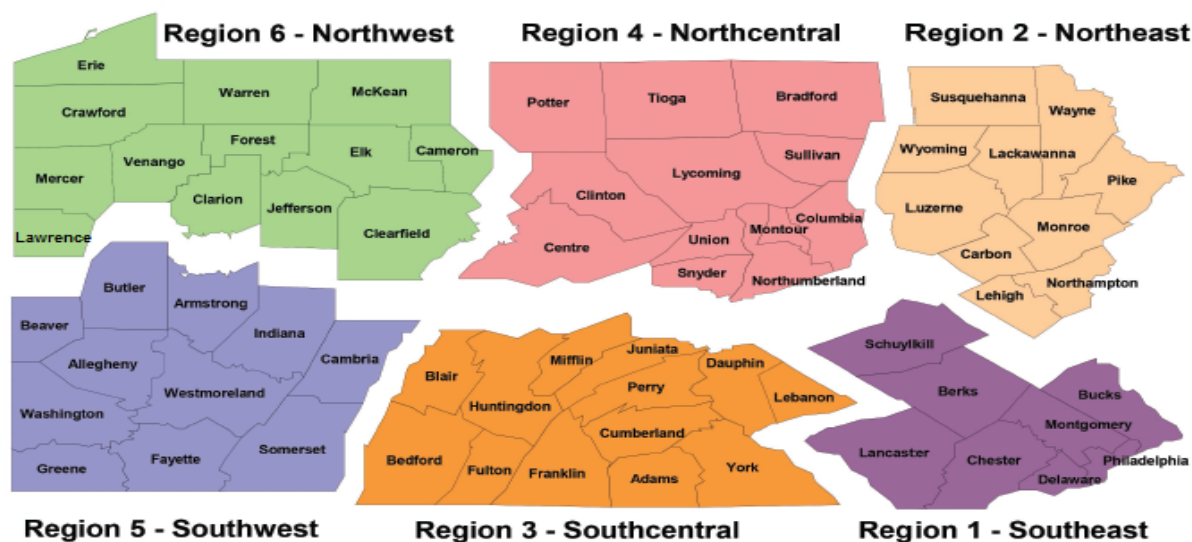
- Each permitted to apply for two additional locations

January 28, 2017

Medical Marijuana Regions



Pennsylvania Department of Health Medical Marijuana Regions



January 28, 2017



Dispensary Permit Distribution

Region 1 Southeast 10	Region 2 Northeast 4	Region 3 Southcentral 3	Region 4 Northcentral 2	Region 5 Southwest 5	Region 6 Northwest 2
Berks (1)	Carbon	Adams	Bradford	Allegheny(2)	Cameron
Bucks (1)	Lackawanna (1)	Bedford	Centre (1)	Armstrong	Clarion
Chester (1)	Lehigh (1)	Blair (1)	Clinton	Beaver	Clearfield
Delaware (1)	Luzerne(1)	Cumberland (1)	Columbia	Butler (1)	Crawford
Lancaster (1)	Monroe	Dauphin (1)	Montour	Cambria	Elk
Montgomery (2)	Northampton (1)	Franklin	Northumberland	Fayette	Erie (1)
Philadelphia (3)	Pike	Fulton	Sullivan	Greene	Forest
Schuykill	Susquehanna	Huntingdon	Snyder	Indiana	Jefferson
	Wayne	Juniata	Tioga	Somerset	Lawrence
	Wyoming	Lebanon	Union	Washington (1)	McKean (1)
		Mifflin	Lycoming (1)	Westmoreland (1)	Mercer
		Perry			Venango
		York (1)			Warren

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Visit www.mpp.org for more information.

