

**Certification Standards  
for Medical Cannabis  
Dispensaries in  
Canada**

**2nd Edition**



# Acknowledgements

## 2nd Edition

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# Table of Contents

<b><u>TABLE OF CONTENTS</u></b>	<b>3</b>
<b><u>INTRODUCTION</u></b>	<b>9</b>
<b><u>CERTIFICATION STANDARDS</u></b>	<b>9</b>
ORGANIZATION OF THE CERTIFICATION STANDARDS	9
<b><u>INTRODUCTION TO CAMCD</u></b>	<b>10</b>
CAMCD MISSION	10
CAMCD VISION	10
CAMCD VALUES	11
CAMCD OBJECTIVES	11
<b><u>MEDICAL CANNABIS IN CANADA</u></b>	<b>12</b>
<b><u>DEVELOPMENT OF THE DISPENSARY</u></b>	
<b><u>CERTIFICATION STANDARDS PROGRAM</u></b>	<b>13</b>
<b><u>SUPPORT AND CONTRIBUTIONS</u></b>	<b>14</b>
<b><u>HEALTH CANADA MARIHUANA FOR MEDICAL</u></b>	
<b><u>PURPOSE REGULATIONS (MMPR)</u></b>	<b>15</b>

<b><u>ONGOING REVISION TO THE CERTIFICATION</u></b>	
<b><u>STANDARDS AND CERTIFICATION PROGRAM</u></b>	<b>15</b>
<b><u>CERTIFICATION PROGRAM OUTLINE</u></b>	<b>16</b>
CERTIFICATION PROGRAM MATERIALS	16
<b><u>PROGRAM ELIGIBILITY AND APPLICATION</u></b>	<b>16</b>
CERTIFICATION PROGRAM STEPS	17
CERTIFICATION DECISIONS	18
CAMCD CERTIFICATES	18
<b><u>CAMCD CERTIFICATION STANDARDS</u></b>	<b>19</b>
<b><u>I. PATIENT ELIGIBILITY</u></b>	<b>19</b>
1. AGE OF PATIENT	19
2. MEDICAL CONDITIONS AND SYMPTOMS	20
A. DIAGNOSIS AND RECOMMENDATION FOR USE	20
B. SPECIAL CONSIDERATIONS	21
3. DOCUMENTATION	23
A. HEALTHCARE PRACTITIONERS	23
B. REQUIRED INFORMATION	24
C. DATE OF DOCUMENTATION	24
i. EXPIRY OF...	24
ii. RENEWAL OF...	25
D. DOCUMENT VERIFICATION	26
E. TYPES OF DOCUMENTATION	26
4. INELIGIBLE APPLICATIONS	27

<b>II. PATIENT INTAKE</b>	<b>29</b>
<del>1. APPLICATIONS</del>	<del>29</del>
A. PROCESSING APPLICATIONS	29
B. CRITICAL AND TERMINAL STAGE ILLNESS	30
2. REGISTRATION	30
A. PATIENT INFORMATION AND VERIFICATION	30
B. PATIENT RIGHTS AND RESPONSIBILITIES	31
C. CONSENT	32
D. DISPENSARY IDENTIFICATION	33
3. PATIENT EDUCATION AND INDIVIDUAL PLANS	34
A. PATIENT EDUCATION	34
B. INDIVIDUAL PLANS AND MONITORING PROTOCOLS	34
<b>III. PRODUCTS AND SERVICES</b>	<b>36</b>
1. ACCESS	36
A. HOURS OF OPERATION	36
B. VISITING PATIENTS	36
C. ACCESSIBLE SERVICES	38
2. CANNABIS STRAINS AND PRODUCTS	39
A. CANNABIS STRAINS	39
B. CANNABIS PRODUCTS	40
C. DEVICES FOR CANNABIS ADMINISTRATION	40
D. OTHER PRODUCTS	41
3. SUPPORT AND MONITORING	42
A. STRAIN AND PRODUCT INFORMATION	42
B. TRACKING EFFICACY AND SIDE EFFECTS	43

C. INDIVIDUALIZED CONSULTATIONS	44
D. SPECIALIZED SUPPORT AND MONITORING	45
4. ANCILLARY SERVICES	46
A. HEALTH CARE AND COMMUNITY RESOURCES	46
B. ADVOCACY	47
<b><u>IV. DISPENSING</u></b>	<b>49</b>
1. OPTIONS AND REQUIREMENTS	49
A. DISPENSING OPTIONS	49
B. VERIFICATION OF IDENTIFICATION	50
2. RESTRICTIONS	51
A. QUANTITY RESTRICTIONS	51
B. RIGHT TO REFUSE SERVICE	52
3. DISPENSING PRACTICES	53
A. DISPENSING AREA	53
B. HANDLING	54
4. ACCURACY AND TRANSPARENCY	54
A. WEIGHING	54
B. LABELLING	55
C. PACKAGING	56
D. SALES RECORDS	57
<b><u>V. SUPPLY</u></b>	<b>59</b>
1. PRODUCT QUALITY	59
A. QUALITY CONTROL	59
B. PRODUCTION METHODS	60
C. STORAGE AND PACKAGING	61

2.	INVENTORY MANAGEMENT	62
	A. PRODUCT VARIETY AND QUANTITY	62
	B. PRODUCT TRACKING	63
3.	SUPPLY ACCOUNTABILITY	64
	A. ELIGIBLE RECIPIENTS	64
	B. CONTRACTS	65
	C. REPORTING RESPONSIBILITIES	66
<b><u>VI. SAFETY, SECURITY AND PRIVACY</u></b>		<b>68</b>
1.	HEALTHY ENVIRONMENT	68
	A. INFECTION CONTROL	68
	B. EMERGENCY PREPAREDNESS	69
	C. RESTROOM FACILITIES	70
	D. ON-SITE MEDICATION USE	70
	E. HEALTH AND SAFETY REGULATIONS	71
2.	SAFE CONDUCT	72
	A. INCIDENT MANAGEMENT	72
	B. CONSEQUENCES FOR INFRACTIONS	73
3.	SECURITY AND PRIVACY MEASURES	74
	A. SECURITY SYSTEMS	74
	B. MANAGEMENT OF SENSITIVE INFORMATION	75
	C. PRIVACY AND CONFIDENTIALITY	76
<b><u>VII. EFFECTIVE ORGANIZATION</u></b>		<b>78</b>
1.	GOVERNANCE AND MANAGEMENT	78
	A. GOVERNANCE	78

B.	RECORD KEEPING	79
C.	FINANCIAL MANAGEMENT AND REPORTING	79
D.	INSURANCE AND RISK MANAGEMENT	80
E.	PERFORMANCE MANAGEMENT	81
2.	LEGAL AND REGULATORY COMPLIANCE	82
A.	FEDERAL, PROVINCIAL/TERRITORIAL AND MUNICIPAL REGULATION	82
B.	APPLICABLE TAXES	82
3.	ACCOUNTABILITY TO PATIENTS	83
A.	RIGHTS OF PATIENTS	83
B.	PATIENT ENGAGEMENT	84
C.	COMPLAINTS PROCESS	84
4.	PERSONNEL AND EMPLOYMENT PRACTICES	85
A.	QUALIFICATIONS AND TRAINING	85
B.	EMPLOYMENT PRACTICES	87
C.	PERSONNEL SUPPORT AND ENGAGEMENT	87
5.	COMMUNITY CONTRIBUTIONS AND RELATIONS	88
A.	COMMUNITY CONTRIBUTION	88
B.	COMMUNITY AND STAKEHOLDER RELATIONS	89

## **APPENDICES** **91**

A.	AGE OF MAJORITY BY PROVINCE/TERRITORY	91
B.	PRESCRIBING RIGHTS BY PROVINCE/TERRITORY	92
C.	LIST OF REQUIRED ORGANIZATIONAL PRACTICES (ROP's)	97
D.	TESTS FOR COMPLIANCE	101



# Introduction

## Certification Standards

The CAMCD Certification Standards represent the foundational policies and practices of dispensary operations. CAMCD has released its Certification Standards to the public for review by all stakeholders with the goal of increasing the transparency, awareness, and credibility of medical cannabis dispensaries. The complexity and breadth of the Certification Standards affirms the important role dispensaries serve in the provision of medical cannabis.

The Certification Standards comprise the core of the CAMCD Certification Program, which is a rigorous and thorough accreditation program for medical cannabis dispensaries. Patients, caregivers, health care practitioners and other community stakeholders can look for a CAMCD Certified dispensary as an assurance of high quality patient care, accountability, and due diligence.

## Organization of Certification Standards

The Certification Standards are organized into 7 key areas of dispensary operations and practices. Standards relating to each key area are further categorized to facilitate understanding and implementation. Each standard is accompanied by corresponding background information explaining the context and intent of each standards. Those Certification Standards that comprise the mandatory Requirement Organizational Practices are indicated throughout, and are listed in Appendix C for quick reference.

## Introduction to CAMCD

The Canadian Association of Medical Cannabis Dispensaries (CAMCD) is a private, not-for-profit corporation established in 2011. CAMCD is an initiative by medical cannabis dispensaries across Canada to bring together organizations and supporters with similar goals and objectives to support and promote the legitimacy of medical cannabis in Canada. CAMCD's mandate is to promote a regulated community-based approach to medical cannabis access and to support medical cannabis dispensaries to provide the highest quality of patient care.

Other CAMCD campaigns include participating in government-sponsored consultations and hearings, working with health care organizations, engaging in research studies and community outreach, and liaising with law enforcement organizations. Together, these efforts reduce the stigma associated with the medical use of cannabis, and help to establish a safer environment for dispensaries, patients, and the community.

## CAMCD Mission

Promoting a regulated community-based approach to medical cannabis access and supporting medical cannabis dispensaries to provide the highest quality of patient care.

## CAMCD Vision

Legally permitted community-based medical cannabis dispensaries providing access to a wide range of high quality cannabis medicines to those in need and regulated in a manner consistent with the highest standard of patient care.

## CAMCD Values

CAMCD values can be found in detail on the CAMCD website:

<http://www.camcd-acdcm.ca/mission>

## CAMCD Objectives

In support of CAMCD's mission, vision and values, the objectives of CAMCD are:

- To establish and uphold standards for the certification of medical cannabis dispensaries;
- To support medical cannabis dispensaries in providing a high standard of care through education, research and the promotion of best practices;
- To provide clients of medical cannabis dispensaries a mechanism to log and address complaints about dispensaries;
- To conduct, encourage and facilitate research into the medical use of cannabis and methods for its production, distribution and regulation;
- To work with the public, government, educational institutions, health care providers and law enforcement agencies to increase understanding of medical cannabis dispensaries.

# Medical Cannabis in Canada

Medical cannabis is an emerging and still controversial therapy. Medical conditions for which cannabis has been demonstrated to have therapeutic potential include cancer, HIV/AIDS, multiple sclerosis, arthritis, glaucoma, migraines, epilepsy, and others. Approximately one million Canadians report using cannabis for medical purposes.<sup>1</sup>

In response to court rulings, Health Canada has established regulations to allow the medical use of cannabis in Canada since 2001. The currently regulations, Marijuana for Medical Purposes Regulations (MMPR) came into effect on October 1<sup>st</sup>, 2014. Despite official recognition by the Canadian courts and government of the rights of patients to access medical cannabis, patients continue to report substantial barriers to this medicine through Health Canada's regulatory framework.

Pre-dating Health Canada's program, a parallel system of medical cannabis access has existed in Canada since 1997 through medical cannabis dispensaries. Approximately 60 dispensaries located across Canada currently serve approximately 40,000 patients upon referral by an authorized health care practitioner. Dispensaries provide access to cannabis-based medicines including a variety of strains and routes of administration (e.g. dried cannabis, baked goods, tinctures, salves, vaporizers, etc.). Dispensaries also provide education on safe and effective use of cannabis and offer other forms of patient supports in a community-based environment.

While court decisions across the country have recognized the important role dispensaries play in the provision of medical cannabis access in Canada, medical cannabis dispensaries have yet to be incorporated into the legal framework for medical cannabis access in Canada. These organizations currently operate outside of mainstream health care services and are otherwise unregulated.

Despite this, dispensaries are well positioned to ensure that patients have timely access to medical cannabis and related services. CAMCD has developed its Dispensary Certification Program in an effort to fill this regulatory gap by assisting dispensaries to improve the quality of services they provide and increase their credibility as models of medical cannabis provision.

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<sup>1</sup> Canadian Addiction Survey 2004: Highlights. Canadian Centre on Substance Abuse. Ottawa, Ontario.

# Development of the Dispensary Certification Standards and Certification Program

While many medical cannabis dispensaries already operate according to industry best practice guidelines developed in 2006<sup>2</sup>, there is variability in practices between dispensaries. Increasing the reliability, consistency and credibility of community-based dispensaries has been identified by health care providers, policy-makers and patients as key to a successful patient-centred model of medical cannabis access<sup>3</sup>.

The goal of implementing an accreditation or certification of organizations is to assure patients and other stakeholders that the organization is reputable and adheres to stringent protocols. Accreditation is one of the most effective ways for health service organizations to regularly examine and improve the quality of their services<sup>4</sup>.

CAMCD identified that a certification program for medical cannabis dispensaries would require a set of measurable dispensary operational standards, the Certification Standards. During the development of the Certification Standards, CAMCD utilized a Delphi process to identify key areas of dispensary operations and practices through consultations with CAMCD directors, dispensary representatives and community stakeholders.

A series of consultation meetings and key informant interviews was held in Vancouver in June 2012 to ensure that CAMCD's Dispensary Certification Standards would address the needs and concerns of patients and dispensaries, as well as other key stakeholders including policy-makers from the medical community, relevant NGOs, all levels of governments, and law enforcement. The input from these meetings and interviews has been incorporated into the Certification Standards and Certification Program.

The 1st edition of the CAMCD Certification Standards were implemented as part of the CAMCD Certification Program, launched as a pilot program in early 2013. The current, 2nd edition represents updates in late 2014.

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<sup>2</sup> Guidelines for the Distribution of Medical Cannabis in Canada. N. Rielle Capler and Philippe Lucas. Published by the BC Compassion Club Society and the Victoria Island Compassion Society.

<sup>3</sup> Community Stakeholders Survey Report. N. Rielle Capler, Megan Hiles, Zachary Walsh, and Philippe Lucas. <http://www.camcd-acdem.ca/publications>

<sup>4</sup> Accreditation Canada. Retrieved June 1 2012 from <http://www.accreditation.ca/about-us/message/>

Dispensary Certification from CAMCD will ensure consistency, accountability, transparency, and superior quality of patient care across the country. Medical cannabis patients, caregivers and health care practitioners across Canada can look to a CAMCD certified dispensary for assurance of quality of patient care and organizational practices.

## Support and Contributions

CAMCD is supported by contributions from medical cannabis dispensaries and other public supporters. The current list of CAMCD Board of Directors and Advisory Board members can be found on the CAMCD website. To donate to CAMCD or one of the current campaigns, visit the CAMCD website: [www.camcd-acdcm.ca/campaigns](http://www.camcd-acdcm.ca/campaigns). The development and implementation of the CAMCD Certification Program is supported in part by a grant from the Peter Wall Solutions Initiative awarded to the SEED project<sup>5</sup>; a collaboration between researchers from the University of British Columbia, Canadians for Safe Access and CAMCD. This project supported CAMCD to conduct a series of consultation meetings and key informant interviews with patients, dispensary operators, policy makers, and other key experts and stakeholders to ensure the CAMCD Certification Program addresses their needs and concerns. The SEED Project has supported the dissemination of the CAMCD Certification Program by co-hosting CAMCD/SEED Dispensary Symposiums coinciding with the launch of the Certification Program in June of 2013, and the release of the second edition of these standards.

## Ongoing Revision to the Certification Standards and Certification Program

The development of the CAMCD Certification Program is a starting point in the process of dispensary certification standards development and revision. All recommendations from dispensary participants, health care practitioners, advocacy and patients groups, surveyors and accreditation organizations and any other stakeholders will be consolidated for review on

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<sup>5</sup> The Medical Cannabis: Standards, Engagement, Evaluation, and Dissemination (SEED) Project is funded by the Peter Wall Solutions Initiative, which focuses on practical and innovative solutions to societal problems. The Peter Wall Solutions Initiative (PWSI) enables UBC faculty to team with community organizations in order to address issues of societal importance through innovative, interdisciplinary and academically rigorous research projects. The PWSI is supported by the Peter Wall Endowment to UBC. <http://research.ubc.ca/vpri/ubc-peter-wall-solutions-initiative>.

an ongoing basis. This field input will be analyzed carefully during program reviews and evaluations and the results of this process will be reflected in further developments of the CAMCD Certification Program. Program participants are responsible to stay up to date with future versions of the CAMCD Certification Standards.

The CAMCD Certification Program, including the Certification Standards, the survey process and survey conditions, is reviewed regularly by CAMCD and may change periodically. Up-to-date information, clarification and notification of any changes can be obtained by contacting CAMCD and by staying updated via the CAMCD website [www.camcd-acdcm.ca](http://www.camcd-acdcm.ca).

## Certification Program Outline

The CAMCD Certification Program is a rigorous external evaluation process comprised of almost 200 checkpoints covering all aspects of dispensary operation, from patient care to business practice. Accreditation takes place over two consecutive program phases: the Candidate Phase, which includes a self-assessment against the Certification Standards and an on-site survey by an external surveyor to achieve Preliminary Certification (valid for 1 year); and the Preliminary Certification Phase. The Preliminary Certification Phase can be skipped by dispensaries achieving a minimum of 90% of the standards following their first on-site survey, and will be awarded Full Certification (valid for 3 years).

## Certification Program Materials

Dispensaries in the Certification Program receive materials to support their development and preparation for the onsite surveys. These supporting materials include the list of tests for compliance that must be met in order to meet each standards and examples of current practices that meet these tests. Dispensaries are also provided and required to complete accompanying documents throughout the program. These include a Baseline Checklist, a Survey Preparation Guide and Patient Surveys to assist

dispensaries during the candidate phase as well as several evaluation tools to support further development of the Certification Program.

## **Program Eligibility and Application**

To be eligible for the CAMCD Certification Program, a dispensary must have a location where patients may visit to access personnel. Medical cannabis may be dispensed onsite at this location, or via home delivery or mail order. Start-up dispensaries may also apply to the Certification Program, but must be prepared to begin the provision of services and satisfy program eligibility requirements within 3 months of application. Within 6 months of admittance to the Certification Program, operating dispensaries must complete their self-assessment and affirm that their current policies and practices meet the Required Organizational Practices of the Certification Standards.

## **Certification Program Phases**

### **Applicant Phase**

To be admitted to the applicant phase, a dispensary must submit a \$1600 application and processing fee, and a completed application. During this phase, the dispensary will be provided with Patient Survey's and the Base-line Checklist. If the application is rejected or withdrawn for any reason, the application fee will be refunded, minus a \$150 processing fee.

### **Candidate Phase**

Dispensaries in the Candidate Phase will be provided with and required to complete the Survey Prep Guide and Self-Assessment Survey. Ongoing support in this phase is geared to preparing the dispensary for its first On-site Survey. At the end of this phase, a dispensary is required to submit a



\$2000 survey fee, and a Survey Request in order to schedule an onsite survey.

## **Preliminary Certification Phase**

After achieving between 50-90% of all standards and all Required Organizational Practices as verified by an On-site Survey, a dispensary is awarded Preliminary Certification. This certification is valid for 1 year, during which on-going consultation with CAMCD supports the dispensary to move towards Full Certification.

## **Full Certification**

A dispensary that achieves a minimum of 90% of the standards and all Required Organizational Practices as verified by an On-site Survey is awarded Full Certification. Full Certification is valid for 3 years.

## **Certification Decisions**

Following the On-site Survey, CAMCD will review the results of the Survey Report and render a Certification Decision. CAMCD Certification Decisions can be appealed with cause.

## **CAMCD Certificates**

A certified dispensary is issued a CAMCD Certificate in both paper and web-based format. CAMCD may from time to time conduct announced or unannounced monitoring visits of CAMCD certified dispensaries. A dispensary may not use or display a CAMCD certificate if certification has expired or has been revoked or in any other manner that is inconsistent with CAMCD objectives. The status of dispensaries participating in the Certification Program will be listed on the CAMCD website:

[www.camcd-acdcm.ca/dispensary-certification](http://www.camcd-acdcm.ca/dispensary-certification)

# CAMCD Certification Standards

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## I. PATIENT ELIGIBILITY

**Goal:** To ensure eligible patients have access to dispensaries

### 1. Age of Patient

**Focus:** Addressing requirements related to age of patient

**Background:**

Typically, the parents or legal guardian provide consent to treatment on behalf of patients under the age of majority and must be guided by what is in the best interest of the minor. However, legislation for consent to medical treatment in a number of provinces and territories in Canada is based on the person's capacity to consent to or refuse the treatment regardless of age<sup>6</sup>. Despite the fact that a minor may consent to treatment, dispensaries must balance patient need for medicine with the current legal status of cannabis and public concerns about age. Except for specific instances where the need for medicine outweighs the public concerns, for example palliative care, it is prudent for dispensaries to abide by the legal age of majority in their province or territory for all patients. (Note: this does not apply to emancipated persons).

**Standard:**

The dispensary accepts patients who have reached the age of majority in their province/territory and minors who have written consent from a parent or legal guardian.

**Tests for Compliance:**

1. The dispensary has documented policies and procedures to verify the age of patients.
2. The dispensary has documented policies and procedures to obtain parent or legal guardian consent for applicants under the age of majority in their respective provinces.
3. Dispensary personnel verify the age of patients and obtain parent or legal guardian consent if applicable before registering a patient.

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<sup>6</sup> For example, [http://www.bclaws.ca/EPLibraries/bclaws\\_new/document/ID/freeside/00\\_96223\\_01](http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_96223_01)

**Examples:**

- *The dispensary's application and intake forms include patient's date of birth.*
- *The dispensary will ensure that visitors from other provinces are of the age of majority in the dispensary province.*
- *Photo identification with birth date is obtained from new patients and a photocopy is kept on record.*
- *For any patients under the age of majority, the parent or legal guardian initials any place where the patient is asked to sign or initial.*
- *The parent or legal guardian will sign and initial documents in the presence of two dispensary personnel or have their signature witnessed by a legally accredited professional.*
- *The parent or legal guardian will provide documentation of their relationship to the patient and a photocopy is kept on record.*
- *The dispensary utilizes a verification checklist for each patient that includes age, date of birth, and whether or not a written consent was obtained for those under the age of majority.*

## **2. Medical Conditions and Symptoms**

*Focus: Addressing requirements related to patient's medical conditions and symptoms*

### **a. Diagnosis and recommendation for use**

**Background:**

Medical cannabis use generally refers to applications that alleviate the suffering related to specific symptoms and medical conditions. Cannabis has well-documented potential medical applications for symptoms including but not limited to pain, muscle spasms, nausea, weight loss, loss of appetite, depression and anxiety associated with the following conditions or medical treatments:

ADHD, arthritis, brain/head Injury, cancer, colitis, chemotherapy, Crohn's disease, epilepsy, fibromyalgia, glaucoma, hepatitis C, HIV/AIDS, irritable bowel syndrome, migraines, multiple sclerosis, muscular dystrophy, nausea (chronic and debilitating), pain (chronic), paraplegia/quadriplegia, Parkinson's disease, PTSD, radiation therapy, seizure disorders (epilepsy), and sleep disorders (chronic and debilitating).

(note: the above list of conditions is not exhaustive and does not account for all patients in all circumstances. This list will be reviewed and modified periodically in light of emerging research.)

Dispensaries provide cannabis for medical purposes only, therefore patients must have a diagnosis and related symptom for which cannabis has well-documented potential medical applications. As a result of barriers to obtaining support of health care practitioner, patients must provide a confirmation of diagnosis for condition/symptoms for which there is sufficient evidence and a specific recommendation for cannabis use for other conditions and related symptoms.

**Standard:**

Before registering a patient, the dispensary requires the patient to present documentation demonstrating either a doctor recommendation or a diagnosis and related symptom/s for which cannabis has well-documented potential medical applications (see list above).

**Tests for compliance:**

1. The dispensary has documented policies and procedures regarding requirements for diagnosis and/or recommendation for use.
2. Dispensary personnel ensure each patient has a documented diagnosis or recommendation for use before they are registered.

**Examples:**

- *The dispensary's application form requests a proof of diagnosis and related symptoms and recommendation for use if applicable.*
- *The dispensary's verification checklist includes verifying that a proof of diagnosis or specific recommendation for the use of cannabis has been obtained, as per above list.*
- *The dispensary uses its discretion where it is not possible to obtain a recommendation for a condition that does not fall in the above list, and records the rationale for the decision made including related research.*
- *A dispensary may choose require a recommendations for use for all patients*

**b. Special considerations****Background:**

Research suggests that cannabis can be effective for certain conditions and symptoms, or certain situations, for which there is also concern about potential risks. These include severe mental health conditions, dependency and addictions, and pregnancy. These may be the primary or secondary medical reason for a patient's use of cannabis. A patient may inform the dispensary of such a condition at the time of registration or at a later point.

Some dispensary patients have recommendations for the use of cannabis for mental health conditions such as bi-polar disorder or schizophrenia. Many patients suffering from critical or chronic physical conditions also experience mental health problems such as depression and anxiety. Research suggests that cannabis can be effective in alleviating the symptoms of many mental health conditions. However, in some cases, cannabis can exacerbate symptoms. This may be related to the strain and dosage used.

Research demonstrates that cannabis can be used as a substitute for alcohol, tobacco, prescription and illicit drugs. Cannabis can also mitigate withdrawal symptoms related to these substances. In addition to using cannabis to alleviate symptoms associated with their medical condition, patients may find that cannabis use leads to a reduction in the use of prescribed pharmaceuticals. The use of cannabis to reduce the use of pharmaceuticals or other substances may be their primary medical reason for cannabis use. There is concern about the potential risk for the development of dependence on cannabis for patients with patterns of dependency, addiction or compulsive use of cannabis or other substances

Cannabis use has been found to be effective for severe nausea in pregnancy. Some patients with medical conditions for which cannabis is effective choose to use cannabis during their pregnancy to alleviate their symptoms. Research on cannabis use during pregnancy is inconclusive as to negative effects on newborns and development.

While requiring a recommendation for use can help provide an extra level of support, these populations often face discrimination and therefore may experience additional barriers to access. The dispensary must balance the concern for potential risks of use with reducing barriers to those who could be benefit from use (See Monitoring Part 3).

**Standard:**

The dispensary supports patients that face barriers to access due to their medical condition or symptoms to obtain necessary confirmation of diagnosis and recommendation for use.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to support patients that face barriers to access due to their medical condition or symptoms to obtain necessary diagnosis and recommendation for use.
2. Dispensary personnel implement the policies and procedures to support patients that face barriers to access due to their medical condition or symptoms to obtain necessary diagnosis and recommendation for use.

**Examples:**

- *The dispensary's intake form and yearly follow-ups specifically ask patients about severe mental health condition; history of dependency, addiction or compulsive use of cannabis or other substance; or of pregnancy.*
- *The dispensary personnel note any time the patient may inform them of a severe mental health condition; history of dependency, addiction or compulsive use of cannabis or other substance; or of pregnancy.*
- *The dispensary obtains a recommendation for the use of cannabis in addition to a confirmation of diagnosis for patients with a severe mental health condition; history of dependency, addiction or compulsive use of cannabis or other substance; or of pregnancy.*
- *The dispensary personnel contacts health care practitioners who have declined to provide a recommendation for medical cannabis use for a patient that faces barriers to access due to their medical condition or symptoms in order to understand the basis of their concerns.*
- *The dispensary contacts social worker or case-worker to enlist their support with the health care practitioner.*
- *The dispensary uses its discretion where it is not possible to obtain a recommendation for use and records the rationale for the decision made, including related research.*
- *The dispensary may allow a confirmation of diagnosis along with a recommendation for use from a registered social worker or other case-worker that is more involved in the patients' care if they are unable to obtain recommendation from an eligible health care provider.*

### 3.Documentation

**Focus:** Obtaining and maintaining required documentation

#### a. Healthcare practitioners

**Background:**

Dispensaries require documentation of their patients' medical conditions and recommendations for the use of medical cannabis. Such documentation and recommendations may be provided by a physician or other health care practitioner that is legally permitted to prescribe medicine (herbal or pharmaceutical) and is a member of a provincial college or other licensing body that has statutory authority to regulate their profession. Besides physicians (MDs), this may differ from province to province and may include doctors of Traditional Chinese Medicine (DTCM), naturopathic doctors (NDs) and nurse practitioners (NPs). A list of Healthcare practitioners and their associated licensing bodies can be found in Appendix B.

**Standard:**

The dispensary obtains documentation of the patient's medical condition and related symptom(s), and recommendations for use, from an eligible health care provider.

**Tests for compliance:**

1. The dispensary has a documented policy reflecting eligible healthcare practitioners.
2. The dispensary only accepts documentation from eligible health care practitioners as a condition of registering a patient.
3. Dispensary personnel implement policies and procedures for eligible health care practitioners.

**Examples:**

- *Application forms and/or other documentation identify the type of healthcare practitioner that provided the proof of diagnosis and/or medical cannabis recommendation.*
- *Verification checklist notes that healthcare practitioner is eligible.*

#### b. Required information

**Background:**

To verify the eligibility of a patient prior to registration, the dispensary will require the following patient information: the patient's full name, date of birth, contact information, diagnosis, condition(s) and related symptoms, other medications, and recommendation for use (if applicable). Additionally, the

following health care practitioner’s information will be required: full name, professional designation, licence number, business address, phone and fax number, as well as their signature and the date on the diagnosis and/or recommendation.

**Standard:**

Application documentation includes all necessary information about the patient and the health care practitioner who is providing the diagnosis and/or recommendation for use in order to verify eligibility of patients.

**Tests for Compliance:**

1. The dispensary has documented policies and procedures in place to collect necessary information for verifying patient eligibility as part of the application process.
2. Dispensary personnel ensure that the necessary information has been obtained before registering a patient.

**Examples:**

- *Dispensary application forms include all of the necessary registration information.*
- *The dispensary utilizes a verification checklist that includes all the necessary application information.*

**c. Date of documentation**

**i. Expiry of documentation**

Patients’ diagnoses and reasons for medical cannabis use must be relevant at time of registration with a dispensary and ongoing as they access cannabis from the dispensary.

The requirement for up-to-date patient records will enable dispensaries to provide informed patient care, and to maintain credibility and accountability as a medical cannabis provider. Thus, the application documentation, including confirmation of diagnosis and recommendation for use, should be as current as possible. A duration of one year from the date the original prescription is written is typical for prescription drugs.<sup>7</sup>

**Standard:**

A dispensary will accept an application with a diagnosis and/or recommendation for use that is dated within the past 1 year.

**Tests for compliance:**

1. The dispensary has documented policies and procedures outlining the acceptable date for diagnoses and/or recommendations by health care practitioners from new applicants.
2. Dispensary personnel implement the policies and procedures regarding acceptable dates for date for diagnoses and/or recommendations by health care practitioners from new applicants.

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<sup>7</sup> [http://library.bcpharmacists.org/D-Legislation\\_Standards/D-2\\_Provincial\\_Legislation/1017-PPP58\\_OrientationGuide.pdf](http://library.bcpharmacists.org/D-Legislation_Standards/D-2_Provincial_Legislation/1017-PPP58_OrientationGuide.pdf)

**Examples:**

- *Dispensary application forms include the date it was signed by the health care practitioner, or the date of diagnosis.*
- *Verification checklist notes that date of diagnosis/recommendation is within last 1 year.*

**ii. Renewal of documentation****Background:**

On the application documentation, the patient's health care practitioner may recommend temporary access, for example in the case of a short-term condition and related symptoms, or may not specify a date in the case of longer-term conditions in order to give discretion to their patient. Requiring regular updates of documentation encourages a scheduled discussion between the patient and their health care practitioners about the patient's experience using medical cannabis products and whether cannabis use is of continued benefit. Typically, a prescription can be renewed for up to one year, and health care practitioners are informed of any renewals. When determining appropriate time-lines for documentation updates, it is important to avoid placing a burden on patients or their health care practitioners and the health care system.

**Standard:**

After a patient is registered, the dispensary will require updated documentation as specified by the health care practitioner or, if there is no specification, at a maximum of every five years.

**Tests for compliance:**

1. The dispensary has documented policies and procedures regarding the updating of patient diagnoses and/or recommendations by health care practitioners.
2. Dispensary personnel implement the policies and procedures regarding r updating diagnoses and/or recommendations by health care practitioners.

**Examples:**

- *Yearly follow-ups include verification of date of diagnosis and/or recommendation.*
- *Dispensary's database includes renewal date for each patient.*
- *If the renewal date is unspecified or longer than 1 year, the dispensary informs the health care practitioner each year the patient remains registered.*
- *The five-year updating can be initiated by the patient or by the dispensary on their behalf with their consent*
- *Dispensary has system in place for informing patients when new paperwork is needed.*

**d. Document verification****Background:**

Verifying the authenticity of documentation provided by the patient and their health care practitioner is vital to the functioning of a dispensary as it will ensure the dispensary is providing cannabis for medical purposes only. It will also support



dispensaries in providing high quality patient care. Specific content of the application documentation that need to be verified are the required information, date of the documentation, as well as the legitimacy of the health care practitioner.

**Standard:**

The dispensary verifies the authenticity of all application documentation.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to verify the date and content of application documentation.
2. The dispensary has documented policies and procedures to ensure that the health care practitioner is currently licensed.
3. Dispensary personnel verify the date and content of application documentation and the validity of health care provider's license before registering the patient.

**Examples:**

- *The dispensary provides patients with Release of Information forms to allow the dispensary to confirm diagnoses and/or recommendations.*
- *The dispensary confirms that the health care practitioner is licensed to practice and is in good standing by contacting the health care practitioner's licensing registry for each application.*
- *The dispensary phones the practitioner's office to verify that the documentation or other forms are in the patient's file, or to otherwise verify the patient's diagnosis concurs with the submitted documentation. The phone number from the registry is used, and should match the phone number on any forms submitted.*
- *The dispensary documents the name of the personnel who verified the documentation, whom they spoke with at the health care practitioner's office, and the date of the call.*
- *Verified information for application documentation is included in a verification checklist.*
- *Documentation is sent directly from the health care practitioner's office to the dispensary.*

**e. Types of documentation**

**Background:**

Various types of documentation may contain the necessary information about a patient, and the health care practitioner (see 2b above). Dispensaries may create a specialized form for health care practitioners to complete. Documentation that ensures the health care provider is aware of the patient's use of medical cannabis and which brings them into the circle of care - such as a dispensary form or a Health Canada form - is ideal. However experience suggests that some health care practitioners may not feel comfortable completing such forms. In some cases, other options for documentation can be used to support patient access to a dispensary.

**Standard:**

The dispensary accepts documentation that includes necessary information about a patient and their health care practitioner.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for acceptable types of documentation for obtaining necessary information about a patient and their health care practitioner.
2. The dispensary has documented policies and procedures for informing patients of acceptable types of documentation.
3. Dispensary personnel implement policies and procedures for acceptable types of documentation and informing patients.

**Examples:**

- *Documentation may be on a form provided by the dispensary for health care practitioners to complete. The form provides health care practitioners the opportunity to both confirm the diagnosis and recommend the use of cannabis. It also allows them to indicate if they do not recommend the use of cannabis and to state their reasons.*
- *Should the patient's health care practitioner refuse to fill out application forms from the dispensary, patients will be informed of the other options for registration (if applicable).*
- *Conditions that require a diagnosis only (see above section) may be written on prescription pads or practitioner letterhead.*
- *Government forms that indicate a medical diagnosis supported by an eligible health care practitioner are acceptable for conditions that require a diagnosis only, as long as they can be confirmed with the health care practitioner (e.g. disability forms).*
- *The dispensary provides patients with release of information form to request that their health care practitioner release relevant medical information to the dispensary.*

## 4. Ineligible applications

**Focus:** Addressing ineligible applications

**Background:**

In some cases, a patient's application will be incomplete, unverifiable, or otherwise inadequate. Informing the patient and their health care practitioner, and explaining the reason(s) for the application's ineligibility ensures the transparency and accountability of the registration process and allows individual patients to potentially address any concerns or complete missing information. The timeliness of notifying patients is crucial as delays may impede access.

**Standard:**

The dispensary will notify the patient and their health care practitioner within 1 week of determining an application is ineligible and will explain the reason for ineligibility.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for notifying the patient and their health care practitioner within two weeks of determination of ineligibility.
2. Dispensary personnel implement the policies and procedures for notifying the patients and the health care practitioner of ineligible applications within two

weeks of determination of ineligibility.

**Examples:**

- *The dispensary informs patient and their health care provider of an ineligible application by phone within 2 weeks of determining ineligibility.*
- *The dispensary offers support for applications on the phone or in person.*
- *A check-list is provided with applications to support proper completion.*
- *A check-list is provided to eligible applicants that indicate the reason why the application was denied.*

## II. PATIENT INTAKE

**Goal:** To ensure patient intake process is transparent and contributes to high quality care

### 1. Applications

**Focus:** Timely and transparent processing of applications

#### a. Processing Applications

**Background:**

After dispensaries verify the information provided on the application forms, each may have unique policies and procedures to process applications and provide access to their products and services. An important aspect of providing effective health care services involves the diligent and timely processing of applications from new patients. Patients who submit applications to a dispensary may have already experienced an extended waiting period for their health care practitioner to complete the necessary forms on their behalf. It is vital that patients are able to access the products and services offered by the dispensary in as timely manner as possible. An efficient and transparent procedure for processing applications will support access and promote accountability to patients.

**Standard:**

The dispensary has a transparent procedure for processing applications.

**Test for compliance:**

1. The dispensary has documented policies and procedures for processing applications.
2. The dispensary has documented policies and procedures to inform patients of the status of their application upon their request.
3. Dispensary personnel implement the policies and procedures for processing applications.

**Examples:**

- *The dispensary keeps a log of all incoming applications and notes the dates they arrived and are verified.*
- *The dispensary notifies patients when their application has been processed and arranges an appointment for registration.*
- *The dispensary provides patients with a handout explaining application process.*
- *Dispensary personnel inform the patient of wait time for registration and if a quicker option is available.*

#### b. Critical and Terminal Stage of Illness

**Background:**

Dispensaries serve many patients who are in the critical or terminal stage of their illness. Some patients may be undergoing treatments with significant side effects, such as chemotherapy for cancer or interferon treatment for hepatitis C. Timeliness of access in such cases is vital since cannabis may provide effective symptom relief and improved quality of life for such patients. Patients in the palliative stage of illness require special consideration. For some, cannabis is effective in supporting a reduction of opiate use. Dispensaries are in a position of both great responsibility and privilege to play such a potentially important role in a person's end-of-life care, and it is one of the most profound aspects of the service a dispensary provides.

**Standard:**

The dispensary provides timely access to services to patients in the critical or terminal stages of their illness.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to identify and prioritize timely access to patients at the critical and terminal stages of illness.
2. Dispensary personnel implement the policies and procedures to identify and prioritize timely access to patients at the critical and terminal stages of illness.

**Examples:**

- *Application forms allow the practitioner to indicate if the patient is in a critical or terminal stage of illness.*
- *The dispensary asks patients with a diagnosis of cancer, or their health care practitioner, if they are currently undergoing chemotherapy or radiation.*
- *The dispensary implements a system to 'fast-track' patients in the critical or terminal stage of illness so they can have access to products and services as soon as possible or within 1-2 weeks.*

## 2. Registration

**Focus:** Requirements for patient registration

### a. Patient Information and Verification

**Background:**

In order to provide the highest quality of care possible and verify the identity of the patient, dispensary personnel will require specific information about the patient. Such information, if collected in a systematic manner, supports dispensaries to evaluate the needs of their patients, create relevant products and services, and to participate in collaborative research. Required information includes:

1. Personal and demographic information.
2. Contact information, including emergency contact information.
3. Detailed information regarding conditions, symptoms, and use of other medications.
4. Previous use of and experience with cannabis.
5. Other relevant information such as pregnancy, eating and sleeping habits, allergies, use of other drugs.
6. Copy of photo ID.

(See Part VI-3c 'Privacy and Confidentiality')

**Standard:**

The dispensary obtains information required to effectively provide services and verify patient identity.

**Tests for compliance:**

3. The dispensary has documented policies and procedures regarding the collection of patient information.
4. The dispensary has documented policies and procedures regarding verification of patient identity.
5. Dispensary personnel collect patient information and verify patient identity as per policies and procedure.

**Examples:**

- *Data collection policies and procedures include required information, accurate and consistent collection of data, informing patients of the purpose of data collected, and accessibility of data to dispensary personnel as needed to provide services.*
- *The dispensary creates intake forms to collect the necessary information.*
- *Personnel are trained to collect information in a consistent manner.*
- *The dispensary creates a secure database of patient information.*
- *Patients are informed through a consent form about the possible uses of collected data which includes the option of not having their data used for internal or external research purposes.*
- *Dispensary personnel compare medical information and medications used by patient against checklist of contraindications for medical cannabis*
- *Dispensary personnel obtain a copy of government-issued photo identification from the patient and confirm that the name and date of birth match information on the application.*

## **b. Patient Rights and Responsibilities**

**Background:**

Providing a detailed agreement or contract that outlines expected patient conduct within the dispensary and in the immediate neighbourhood helps to create a safe, secure and welcoming environment for patients and personnel while also encouraging awareness of and respect for local community norms and expectations. It is important for patients to be aware of the consequences for infractions as well as any courses of appeal (See Part VI-2b 'Consequences for

Infractions’). An agreement or contract can inform patients of their rights and of the process for recourse if they believe their rights have been violated. Review of mutual expectations with each new patient helps to prevent problems and support resolution of any that do arise.

**Standard:**

The dispensary ensures all patients are aware of their rights and responsibilities, including repercussions for infractions, courses of appeal and process for complaints.

**Tests for compliance:**

1. The dispensary has documented the rights and responsibilities of patients, including repercussions for infractions, courses of appeal and process for complaints.
2. The dispensary has a documented policy and procedure to ensure patients are aware of their rights and responsibilities, including repercussions for infractions, courses of appeal and process for complaints as part of their registration.
3. Dispensary personnel implement the documented policy and procedure to ensure patients are aware of their rights and responsibilities including repercussions for infractions, courses of appeal and process for complaints.

**Examples:**

- *The dispensary produces and provides a Rights and Responsibilities document for all patients to review and sign as a requirement for accessing products and services from the dispensary.*
- *A copy of the document is given to the patient and a signed copy retained in their file.*
- *Since the document may change, the version that the patient has signed is noted.*
- *Evidence of re-sale of medications procured from a compassion club is grounds for an immediate loss of privileges.*

**c. Consent**

**Background:**

Dispensaries in Canada are operating within a climate of general cannabis prohibition to provide cannabis to those in medical need. In such a legal climate, it is important to make it as explicit as possible that the dispensary is providing cannabis only to patients requiring it for therapeutic purposes. Beyond requiring documentation from health care practitioners to ensure that all patients have medical need, the dispensary can take further steps to clarify their role through explicit patient consent forms designating the dispensary to procure medical cannabis on their behalf and agreeing that the cannabis they obtain from the dispensary is for their own medical use. It is also important for the patient to be made aware of the legal status of cannabis and dispensaries and to accept any related risks. Such a consent form establishes legitimacy for both patients and dispensaries.

**Standard:**

The dispensary obtains the patient's consent designating the dispensary to procure medical cannabis on their behalf for their own medical use, and establishing their awareness of the legal status of cannabis and dispensaries and acceptance of any related risks.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to obtain the patient's consent designating the dispensary as their agent to procure cannabis on their behalf.
2. The dispensary has documented policies and procedures to obtain the patient's consent accepting the legal risk in acquiring from the dispensary
3. The dispensary has documented policies and procedures to obtain the patient's consent confirming that the cannabis obtained from the dispensary is for their personal medical use only.
4. Dispensary personnel obtain consent as per documented policies and procedures.

**Examples:**

- *The dispensary provides a consent form for all patients to sign upon registration with the dispensary.*
- *The consent form is easy to understand, uses clear appropriate language, and is read aloud with patients to ensure comprehension.*
- *A copy of the signed consent form is given to the patient and a copy placed in their file.*
- *Dispensary personnel review and receive consent from the patient accepting the legal risk of acquiring from the dispensary.*
- *The dispensary provides a form for the patient releasing the dispensary from liability.*

**d. Dispensary Identification****Background:**

For security purposes at the dispensary, it is important that dispensary personnel are able to verify their patients' identification in a timely manner upon every visit to the dispensary. For smaller dispensaries, the personnel may be familiar with each patient, however at larger dispensaries with many patients and personnel, a more formal system may be required. For external purposes, there are circumstances where it may be desirable for the patient to be able to identify themselves as a patient whose medical use of cannabis has been verified by a dispensary. For example, law enforcement officers in many municipalities across Canada recognize registration cards from respected dispensaries as evidence of legitimate medical cannabis use. This can save patients from being detained, arrested, charged or having their medicine confiscated.

**Standard:**



The dispensary provides patients with a means to identify that they are registered with the dispensary both for internal and external purposes.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for dispensary personnel to identify that the patient is registered.
2. The dispensary has documented policies and procedures for patients to identify to third parties that a patient is registered and in good standing with the dispensary.
3. Dispensary personnel implement the documented policies and procedures of ensuring patients can be identified as being registered and in good standing with the dispensary.

**Examples:**

- *The dispensary has Photo ID system including cards for patients and authorized caregivers.*
- *Photo ID checked upon each visit before products and services are rendered.*
- *The dispensary utilizes Point-of-Sales system with Photo ID software/ hardware.*
- *The dispensary provides obtains consent patients to sign to confirm their registration to other dispensaries or third parties.*

### **3. Patient Education and Individual Plans**

**Focus:** Providing education and individualized care to patients

#### **a. Patient Education**

**Background:**

It is important that patients using cannabis as a medicine are equipped with all of the information necessary to use it safely and effectively. Dispensaries are well-positioned to work with patients and other health care providers to ensure all are informed and able to make educated choices about the role of the cannabis within their overall treatment regimen. Dispensaries may be the primary patient resource for information on the use of medical cannabis, and the intake process provides an opportune time to provide patients with preliminary education on the safe and effective use of cannabis. Dispensaries should also be available to provide information to patients upon their request. Unless personnel are qualified to provide medical advice, it is important to make it clear that any information provided is intended to support patients to make informed choices. Efforts should also be made to notify patients of significant scientific, social, regulatory or legal developments.

Essential topics of patient education include:

- Strain selection to target particular symptoms or conditions, ‘indica’ and ‘sativa’ effects, etc.
- Safe use, including safe smoking techniques and alternatives to smoking, such as ingestion options and vaporization.
- Dosage, potency and titration.
- Tolerance, dependence and withdrawal.

- Potential adverse reactions, side-effects, contraindications and drug interactions.
- Safe behaviour, such as not driving while impaired.
- Social, political and legal context, including legal risks, stigmatization, variance in law enforcement understanding, etc.

**Standard:**

The dispensary provides the patient with evidence-based information regarding the safe and effective use of cannabis.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for providing patient education.
2. The education content includes up to date information about plant quality and strains; ingestion options; side-effects, dosage and potency; legal considerations.
3. Dispensary personnel implement the patient education policies and procedures.

**Examples**

- *The dispensary has procedure to include education for each new patient, including tailored advice on strain selection and potential drug interactions.*
- *The dispensary provides a means for patients to access information from the dispensary regarding their own use of cannabis and cannabis products, including strain and/or product purchasing records.*
- *Personnel encourage and support patients to keep track of the effects of particular products, strains and dosage and other relevant considerations (e.g. pain level, other medications being used).*
- *Newsletters, patient email lists, Facebook notices, and tweets are used as effective ways to communicate novel information to patients.*
- *Workshops on relevant topics such as safe cultivation techniques, the production of alternate forms of ingestion, and legal rights training are provided to assist in empowering and informing patients.*
- *Information is provided to the patient regarding effective use of medical cannabis for specific conditions, including possible contraindications.*
- *Information is provided to the patient outlining the risks and benefits in using medical cannabis for their condition.*

**b. Individual Plans and Monitoring Protocols**

**Background:**

The role and use of cannabis in a patient’s overall treatment may vary greatly from one patient to the next. For example, each individual patient has unique symptoms, medical histories, treatment regimens, and work and living situations. As part of the intake process and ongoing care, the dispensary should work with the patient to develop plans based on individual needs. These plans may include supporting patients to determine appropriate strains, methods of ingestion, and dosages.

The dispensary should also work with patients to develop protocols for monitoring those who might require specialized care and support, such as palliative patients and those with mental health or substance use conditions. Monitoring protocols involve follow-up or check-in with individual patients at regular intervals to ensure this treatment is of continuing benefit. A dispensary may also include the patient's primary health care practitioner in the development of protocols. It is important for dispensaries to develop individual plans and monitoring protocols for patients within a collaborative relationship with the patient's health care providers (Part 3 for implementation).

**Standard:**

The dispensary works with patients to develop individual plans based on individual patient needs and protocols for patients who may require specific support or monitoring.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to develop individual plans based on individual patient needs.
2. The dispensary has documented policies and procedures to develop monitoring protocols for patients with special consideration that require specific support.
3. The dispensary has documented policies and procedures to advise the patient to contact the dispensary and their health care practitioner if there is a worsening of symptoms or adverse effects.
4. Dispensary personnel implement policies and procedures to develop individual plans and protocols for specific support and monitoring.

**Examples:**

- *Intake and consultations occur in settings that ensure privacy for the patient*
- *Monitoring plans include annual follow-ups with patients to ensure that individual cannabis-related care needs are addressed and optimized, providing individual consultations by appointment or during transactions, and check-ins at regular intervals with patients requiring specific support*
- *Dispensary personnel provide information to the patient's practitioner regarding use of medical cannabis for specific conditions and choices made by the patient regarding their medical use of cannabis (e.g. Strains or products found effective and how they are used.)*

### III. PRODUCTS AND SERVICES

**Goal:** Products and services that meet patient needs are consistently accessible.

#### 1. Access

**Focus:** Accessibility of products and services

##### a. Hours of operation

**Background:**

One of the most important factors determining patient access to services is having consistent hours of operation. In determining the hours of operation, the dispensary should consider the range of times in which patients may be able to access the dispensary services and personnel. Some patients will only be able to visit or call the dispensary in the evening or on weekends, while others may be limited to day-time hours. It is important to ensure that patients are aware of the hours of availability of all services offered with sufficient notice of any changes so that patients can make plans accordingly.

**Standard:**

The dispensary has consistent hours of operation.

**Tests for compliance:**

1. The dispensary has documented hours of operation.
2. The dispensary has documented policies and procedures to inform patients of hours of operation.
3. Dispensary personnel implement documented hours of operation and policies and procedures to inform patients of hours of operation.

**Examples:**

- *Current opening hours are posted on the dispensary's website, phone message, the front door and inside the dispensary.*
- *Notices of any changes to opening hours, including holidays or special events are posted at least two weeks in advance of changes and communicated through various media.*
- *The dispensary notifies patients of dates and times when specialized services are offered.*

##### b. Visiting patients

**Background:**

By providing services to visiting patients, dispensaries can support medical cannabis patients to travel within Canada without foregoing access to their

medicine. Visiting patients must be registered with another CAMCD certified dispensary, or must hold a valid authorization from Health Canada or from an international jurisdiction that has medical cannabis legislation. When determining whether to provide access to visiting patients from a US state, it is important to consider the legal risks of providing services to patients with authorization from outside Canada. In all cases, appropriate paperwork must be obtained and verified to ensure that medical cannabis and cannabis products are dispensed only to valid visiting patients. A dispensary may choose to offer a limited timeframe for visiting patients to access services before they are required to register.

**Standard:**

Dispensaries may choose to provide services to visiting patients who are registered with another CAMCD certified dispensary, or who possess a valid authorization from Health Canada or from an international jurisdiction that has medical cannabis legislation.

**Tests for compliance:**

1. The dispensary determines a policy regarding the provision of access to visiting patients.
2. Dispensaries that offer access to visiting patients have documented policies and procedures for verifying and allowing access to visiting patients.
3. Dispensary personnel allow access to visiting patients as per dispensary policies and procedures.

**Examples:**

- *Visiting patients from other Canadian dispensaries must provide a copy of their physician's statement or recommendation for medical cannabis along with their dispensary registration card and photo ID.*
- *The dispensary with which the visiting patient is registered is contacted to confirm patient registration and their physician's current license to practice verified using their provincial College of Physicians and Surgeons database.*
- *U.S. patients require a currently valid state or county-issued identification card that is verified with the state or county office by the dispensary. If the state or county does not issue cards, the patient must provide a copy of a valid prescription for medical cannabis which the dispensary verifies with the doctor's office, as well as verifying the doctor's current license to practice.*
- *A dispensary that provides access to patients visiting from the U.S.A. requires them to sign a waiver declaring that the product procured from the dispensary is for use in Canada only.*
- *The dispensary allows patients to visit on up to 4 occasions before requiring patients to become a registered patient with the dispensary.*
- *The dispensary keeps records of visiting patients' documents and purchases.*
- *Personnel ensure that visiting patients are made aware of their rights and responsibilities.*
- *Visiting patients who request access to services are notified in a timely manner whether access will be granted.*

## c. Accessible services

### Background:

Dispensaries share a fundamental aim to ensure that services are equally accessible to all registered patients. An effective accessibility strategy first identifies potential barriers to access, including structural and environmental barriers, and works to create balanced solutions to reduce or eliminate them. The dispensary may serve patients with a range of challenges, for example, physical disabilities, mental health issues, language barriers, and hearing or sight impairments. Considerations about accessibility begin prior to selecting an appropriate location for a dispensary, such as neighbourhood safety, accessibility to public transport and availability of parking. Some structural barriers are modifiable, such as the number of steps, width of doorways and interior layout. Other barriers may be related to policies and practices, such as a non-discrimination or means of communicating important information. Feedback from personnel, patients and their caregivers can help to identify and prioritize barriers to access that need to be addressed.

### Standard:

The dispensary strives for full accessibility to services.

### Tests for compliance:

1. The dispensary complies with applicable accessibility legislation.
2. The dispensary has documented policies and procedures to ensure accessibility.
3. Dispensary has documented policies and procedures for patients to communicate concerns regarding accessibility.
4. The dispensary personnel implement policies and procedures to ensure accessibility and for patients to communicate concerns regarding accessibility.

### Examples:

- *The dispensary documents potential barriers to services and develops a strategy and timeline to address them.*
- *Personnel identify potential barriers for individual patients during registration and on an ongoing basis via surveys and feedback forms.*
- *The dispensary has no architectural or physical barriers into or around the dispensary, or to key amenities and services, which would limit access for people using wheelchairs.*
- *The dispensary has appropriate emergency alarms and evacuation plans that include considerations for accessibility.*
- *The dispensary offers communication material accessible to people with hearing or visual impairments, language or literacy issues.*
  
- *Personnel educate patients about appropriate behaviour and language inside and in the vicinity of the dispensary in regards to the creation of a safe space for patients and address any issues that arise.*
- *Signs are posted inside the dispensary to ensure patients and personnel are aware of chemical, fragrance and other odour considerations.*

## 2. Cannabis Strains and Products

**Focus:** Providing strains and products to effectively treat patients' symptoms and conditions

### a. Cannabis Strains

**Background:**

The therapeutic use of cannabis has a recorded history dating back thousands of years, during which cannabis has been cross-bred to create hundreds of different strains. Individual cannabis strains contain different quantities of cannabinoids and other active agents, such as terpenoids and flavonoids, giving each strain a unique pharmacological profile. More research is required to clearly establish how these profiles are related to their differential therapeutic effects in relation to different symptom and condition complexes. Although identification of component cannabinoid profiles is possible through laboratory testing, this technology is currently not accessible to most dispensaries. Patients often report specific symptom relief of their symptoms from particular strains and may require a variety of strains to address their symptoms. A variety of methods can be used to identify beneficial strains, such as patient self-reporting and analysis of purchasing records. Dispensaries can work with contracted suppliers to ensure a consistent supply of a variety of beneficial strains (For quality control and production methods, see Part 5 Section 1).

**Standard:**

The dispensary provides consistent access to a variety of strains to address patients' symptoms and conditions.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to ensure that a variety of strains are consistently available.
2. Dispensary personnel implement the policies and procedures to ensure a variety of strains are consistently available.

**Examples:**

- *The dispensary works with diverse group of contracted suppliers to ensure a variety of different strains are consistently available.*
- *Producers use plant cuttings to maintain strain consistency between batches.*
- *The dispensary uses a sensory panel to perform testing to identify strain characteristics prior to acquisition.*
- *Strain samples are laboratory tested to identify cannabinoid profile information.*
- *The dispensary prioritizes production of strains that have specific therapeutic applications.*
- *The dispensary offers cannabis strains produced using organic production methods.*

## b. Cannabis products

### Background:

The active constituents of cannabis can be extracted from the plant matter and made into products that can be administered in a variety of ways to produce different effects. Some patients are referred to dispensaries by their healthcare practitioners in order to access alternative methods of administration. Patients who require larger doses of cannabinoids to alleviate their symptoms may find concentrates to be an effective alternative or supplement to dried raw cannabis. Edible cannabis products have a slower onset of effects but may be longer lasting. Some patients report that alcohol-based extractions such as tinctures or oral-mucosal sprays provide a quick delivery method without the irritation associated with smoked cannabis, in addition to providing a controlled dose. Products that can be applied topically may also confer benefit to some patients. Since cannabis products are typically produced from cannabis plant by-products, they can often be a more cost-effective option for patients. It is important for dispensaries to offer a variety of cannabis products for optimal patient care. (For quality control and production methods, see Part 5 Section 1)

### Standard:

The dispensary provides consistent access to a variety of cannabis products and different modes of administration.

### Tests for compliance:

1. The dispensary has policies and procedures to ensure that a variety of cannabis products are consistently available.
2. Dispensary personnel implement the policies and procedures to ensure that a variety of cannabis products are consistently available.

### Examples:

- *The dispensary offers a variety of medical cannabis products in a range of dosages and price categories.*
- *The dispensary operates a commercial-grade kitchen to produce medical cannabis products.*
- *The dispensary contracts with suppliers of cannabis extracts and edible product.*
- *The dispensary offers strain-specific cannabis products to address patient symptoms and conditions.*
- *The dispensary offers edible cannabis products to meet a variety of dietary restrictions and preferences, including sugar-free, gluten-free and vegan and raw or fresh cannabis options.*
- *The dispensary sells cannabis-infused oil, alcohol, and glycerin-based products for patients to incorporate into their own dietary habits.*
- *The dispensary promotes edible cannabis products that have high nutritional content and are made with natural and organic ingredients.*

## c. Devices for cannabis administration

### Background:

Medical cannabis and some cannabis products may require implements such as pipes, papers or vaporizers for administration. The use of such devices can be



reflective of patient preference, characteristics of products (e.g. kif or hashish), or a desire to minimize respiratory irritation. Dispensaries are well-positioned to educate patients about proper use techniques and collect feedback about the benefits and potential drawbacks of the use of different devices. The dispensary may offer purchasing support to patients for more costly devices to encourage patients to adopt safer or more cost-effective methods of cannabis administration.

**Standard:**

The dispensary provides access to devices for the administration of cannabis that support patients to use cannabis safely and effectively.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to ensure that patients have access to devices for the safe and effective administration of cannabis and cannabis products.
2. Dispensary personnel implement the policies and procedures to ensure that patients have access to devices for the safe and effective administration of cannabis and cannabis products.

**Examples:**

- *The dispensary makes available a range of devices including papers, filter tips, pipes, and vaporizers.*
- *The dispensary offers rolling papers that are unbleached, free of combustion enhancers and produced from tree-free materials such as hemp or rice.*
- *The dispensary directs patients to retailers where devices that are not offered at the dispensary can be purchased.*
- *The dispensary creates and makes available brochures describing the safe and effective use of devices.*
- *Personnel provide demonstrations of safe and effective use of devices.*
- *The dispensary has a rental program to allow patients to try a vaporizer at home for a period of time (with disposable or sterilized mouthpiece).*
- *The dispensary provides payment plans for devices and identifies retailers that will provide discounts to patients.*

**d. Other products**

**Background:**

Dispensaries are in a position to provide access to educational materials or nutritional and health products that may be beneficial to medical cannabis patients. Dispensaries that choose to offer such products must have the appropriate retail license and must ensure that the products sold are sanctioned for sale in Canada. It is the responsibility of the dispensary to ensure that natural health products or medicinal herbs are approved by Health Canada. Tobacco, alcohol or illicit substances other than cannabis are not to be sold at a dispensary, nor used on site.

**Standard:**

The dispensary may choose to sell other products that are approved for sale in Canada with the appropriate retail license with the exception of alcohol, tobacco or illicit substances other than cannabis.

**Test for Compliance:**

1. The dispensary has policies and procedures to ensure that all non-cannabis products sold are approved for sale in Canada and that the dispensary has the appropriate retail license.
2. The dispensary has policies and procedures that prohibit the sale of alcohol, tobacco, or scheduled substances other than cannabis.
3. Dispensary personnel implement documented policies and procedures for the sale of other products.

**Examples:**

- *The dispensary sells educational materials, such as books, magazines or journals.*
- *The dispensary makes available for purchase a variety of nutritional and natural health products, medicinal herbs, tinctures or teas that are approved for sale in Canada.*

### 3. Support and Monitoring

**Focus:** Supporting patients to maximize benefits and minimize harms

#### a. Strain and product information

**Background:**

It is important for patients to have pertinent information about the cannabis strains and products available to them in order to make selections that will best meet their needs. Full-spectrum chromatographic analysis of cannabinoid profiles remains cost-prohibitive to most dispensaries and the correlation to symptoms requires further research. However dispensaries can support safe and effective use by providing accurate descriptions, including strain or product name, ‘indica’, ‘sativa’ or ‘hybrid-cross’ identification, likely effects, and method of production (organic/non-organic; indoor/outdoor). Because the effects of cannabis and cannabis products can be very individualized, dispensaries must be cautious about offering specific health claims and focus instead on providing enough information to allow patients to make appropriate selections.

**Standard:**

The dispensary provides information that supports patients to select strains and products most appropriate for their individual needs.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for providing information on strains and products to patients.
2. Dispensary personnel provide information on strains and products to patients as per documented policies and procedures.

**Examples**

- *Strain and product descriptions include strain names, 'sativa-to-indica ratios', available cannabinoid and terpenoid profile information, likely effects and suitability for different symptoms, as well as information on smell, taste, strain origins and production method (indoor/outdoor, organic, etc.).*
- *Samples of available strains are provided for visual and olfactory inspection by patients.*
- *The dispensary gathers information through cumulative anecdotal reporting of patients' experience with each strain or product, analysis of purchasing records to detect strain-symptom correlations, discussions with suppliers about plant or product characteristics, as well as general knowledge of likely effects based on awareness of the each strain's genetics.*
- *Information is displayed in the dispensary and on product labels, as well as included on website and phone messages describing available strains and products.*
- *Information is communicated directly to patients at time of purchase or during individual consultations.*

**b. Tracking efficacy and side-effects****Background:**

Dispensaries are often the main point of contact for patients in regards to their medical use of cannabis and are therefore in a good position to monitor their use of cannabis and its effectiveness in their treatment. Such monitoring can be of benefit to all patients and particularly those with identified individual needs or special considerations. Cannabis strains and products have a wide range of effects and may affect patients differently as a result of individual biochemical responses. By tracking efficacy, side effects and any adverse reactions, patients can maximize the effectiveness of medical cannabis in their treatment. Dispensaries can support patients by recording their reported experience regarding the effects and effectiveness of various strains of cannabis or cannabis products. Dispensaries can also provide patients with tools to track the efficacy and side effects of the strains and products they use.

**Standard:**

The dispensary assists patients to track the efficacy and side effects of cannabis strains and products.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to track patient

- reports of efficacy and side effects with cannabis strains and products.
2. The dispensary has documented policies and procedures to provide tools to patients to track efficacy and side effects of strains and products.
  3. Dispensary personnel implement the policies and procedures to track patient reports and provide tools to patients to track efficacy and side effects of strains and products.

### **Examples**

- *Point-of-Sales systems or other information management systems are used to record information provided by patients about their experience with different strains and products.*
- *The dispensary provides tracking sheets to record and monitor the effects of different strains, including information about strain, method of administration, dosage, time of day, physical, mental and emotional state before and after administering cannabis.*
- *The dispensary assists patients to analyze recorded information to identify the most efficacious strains and products for them.*

## **c. Individualized consultations**

### **Background:**

Individualized patient consultations are one of the most valuable services offered by dispensaries. Consultations occur at the time of purchase and may also be scheduled by appointment. During these consultations, dispensary personnel have the opportunity to provide information to each patient about managing their condition and symptoms with available cannabis and cannabis products. This may include information to support the selection of the most appropriate cannabis strains and products, methods of administration or dosage. Consultations also provides an opportunity to answer questions that the patient may have, identify and mitigate any adverse effects experienced by the patient, discuss changes in the patient's condition and symptoms, and otherwise promote the safe and effective use of cannabis. Additionally, individualized consultations can assist patients with specific challenges such as mental health conditions, dependency or addictions issues, or palliative care. This individualized care and attention can support patients in meeting their unique treatment goals and empower them to take an active role in their own health care. Consultations provide an opportunity to support patients to access ancillary health care services and community resources. Individualized consultations also provide a human and social dimension to receiving support, where patients become recognized as members of a community and experience the dispensary as a welcoming and supportive environment in their lives.

### **Standard:**

The dispensary provides individualized consultations to support patients to meet their individual needs.

### **Tests for compliance:**

1. The dispensary has documented policies and procedures for providing individualized patient consultations.
2. Dispensary personnel implement policies and procedures for providing

individualized patient consultations.

### **Examples:**

- *Observations on use of cannabis (e.g. increase or decrease) and changes in overall health and well-being of patient are noted on purchasing records at each visit.*
- *The dispensary provides advice on similar strains to those the patient has found effective in the past or that patients with similar conditions or symptoms have found effective.*
- *The dispensary conducts yearly follow-up with all patients to assess the effectiveness of cannabis in their treatment.*
- *The dispensary provides private purchasing areas for brief consultations at time of purchase.*
- *The dispensary offers scheduled appointments for lengthier discussions as needed.*
- *Consultations involve parents or legal guardians or other care providers where applicable.*

## **d. Specialized support and monitoring**

### **Background:**

Patients with a condition for which there are potential risks for cannabis use may require additional or specialized support and monitoring. While research suggests that cannabis can be an effective treatment option for conditions such as severe mental health conditions, dependency and addiction, there may be cases where cannabis can exacerbate symptoms. Additionally, patients who are pregnant or who are under the age of consent may benefit from specialized support and monitoring. Patients may apply to the dispensary with a diagnosis for such a condition, or may disclose or be diagnosed with such a condition at a later date. It is important that dispensary personnel identify patients for whom specialized support and monitoring is required. Effective support and monitoring may include collaboration with a patient's caregiver(s) or health care practitioner(s) to support and monitor whether cannabis use is of benefit to the patient (see Part 2).

### **Standard:**

The dispensary identifies patients for whom cannabis use may poses potential risks and provides specialized support and monitoring for these patients.

### **Tests for Compliance:**

1. The dispensary has documented policies and procedures to identify, support and monitor patients for whom cannabis use poses potential risks.
2. Dispensary personnel implement the policies and procedures to identify, support and monitor patients with a special considerations for which cannabis use poses potential risks.

## Examples:

- *The dispensary provides resources for patients about potential risks and benefits of cannabis use that are specific to their condition and symptoms.*
- *The dispensary engages the patient's health care practitioner or social worker or case-worker to identify how they may participate in the support and monitoring of their patient.*
- *The dispensary's intake form and yearly follow-ups specifically ask patients about personal history of dependency, addiction or compulsive use of cannabis or other substances.*
- *The dispensary keeps records of patients who identify that they have a history of mental health conditions, dependency, addiction or compulsive use of cannabis or other substances.*
- *The dispensary books follow-up appointments or scheduled times to check in with patients special considerations to ensure that cannabis continues to be of benefit to them.*
- *The dispensary employ counsellors or other practitioners who offer patients further complementary support.*
- *The dispensary makes referrals to counsellors to support patients with mental health or dependency issues.*
- *The dispensary provides information to the patient's health care practitioner such as dosage, efficacy of strains and products used, reports of consultations etc. with the consent of the patient.*
- *The dispensary records strains or strain types that may cause, or have caused, adverse reactions and ensures patients are aware of potential risks.*

## 4. Ancillary Services

**Focus:** Supporting access to ancillary services

### a. Health care and community resources

#### **Background:**

Some patients are affected by social or personal issues unrelated to their medical use of cannabis, such as poverty, addiction, legal difficulties, and homelessness. Dispensary personnel interact with many patients on a regular basis and may be in a position to make referrals to other kinds of health care and community resources. Referrals may be made to health care providers or agencies, patient support groups, social services, food or housing programs, emergency shelters, drop-in centres, crisis lines, advocacy support, legal aid and other services. Many dispensaries have established relationships with these support services providers. Some dispensaries also employ health care practitioners who are able to provide complementary treatments such as counselling, acupuncture, nutritional counselling, massage therapy, and herbal medicine.

**Standard:**

The dispensary supports patients to access ancillary health care services and community resources.

**Test for compliance:**

1. The dispensary has documented policies and procedures to support patients' access to ancillary health care services and community resources.
2. Dispensary personnel support access to ancillary health care and community resources according to documented policies and procedures.

**Examples:**

- *The dispensary maintains a patient resource area with information about ancillary social services and community resources.*
- *The dispensary is aware of available community and health care resources and provides information upon request.*
- *Dispensary personnel provide patients in crisis or with specific needs with information to access appropriate services and may support them in making contact with the relevant agency or service.*
- *Dispensary personnel make referrals to licensed health care practitioners to provide complementary treatment.*
- *The dispensary maintains relationships with health care and other social support agencies and makes referrals as appropriate.*

**b. Advocacy****Background:**

Despite federal and judicial recognition of the legitimacy of medical cannabis, there remains a stigma related to its use that can negatively impact the well-being of patients. Infringements of the individual rights and freedoms of patients may come to light and dispensaries can at times be in a position to help through education or direct advocacy. The dispensary's advocacy role may include writing letters of support or confirming registration for the patients they serve. Additionally, dispensaries may provide contact information for advocacy and support groups that can defend the human rights of medical cannabis patients. The dispensary may directly assist patients in making contact with an agency of assistance or offer a referral where appropriate. Dispensaries can also engage in education and outreach efforts to increase community understanding and acceptance of medical cannabis to help reduce the stigma faced by patients.

**Standard:**

The dispensary provides access to advocacy related to the patient's use of medical cannabis.

**Test for compliance:**

1. The dispensary has documented policies and procedures for providing access to advocacy.
2. The dispensary maintains a log of advocacy activities.
3. Dispensary personnel implement the documented policies and procedures for providing access to advocacy.

**Examples:**

- *The dispensary writes confirmations of registration or letters of support to patients upon request.*
- *The dispensary refers patient to lawyers informed on medical cannabis issues.*
- *The dispensary advocates for patient rights around medical cannabis use, e.g., with law enforcement, landlords or other parties.*
- *The dispensary appears in court to offer testimony of behalf of the patient.*
- *The dispensary conducts or participates in public education activities that promote greater understanding of medical cannabis issues and the elimination of discrimination and stigma.*
- *The dispensary is involved in civic and municipal activities, neighbourhood associations, community boards, committees, etc.*



## **IV. DISPENSING**

**Goal:** Cannabis and cannabis products are dispensed in a safe, timely and accountable manner.

### **1. Options and Requirements**

**Focus:** Supporting access to registered patients

#### **a. Dispensing options**

**Background:**

Dispensary patients have diverse needs for accessing products and services, depending on their condition and other life circumstances. Dispensaries may provide for onsite access, pick-up by a designated caregiver, mail order, or local home delivery or a combination of these. When determining which dispensing options to offer, it is important for a dispensary to consider that different options carry a variety of different benefits as well as potential risks. In all cases, it is the responsibility of the dispensary to take measures to protect the safety and security of patients and personnel and to ensure that medical cannabis and cannabis products are provided strictly to the registered patient. It is important for patients who are accessing the dispensary by any of these options to be able to access information about the available cannabis and cannabis products by phone or via the dispensary website. Offering a variety of different payment options can also serve to improve access and convenience, as well as address concerns about safety and security.

**Standard:**

The dispensary offers at least one dispensing option, including onsite access, pick-up by a designated caregiver, home delivery and mail order.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for each dispensing options offered.
2. The dispensary has policies and procedures to confirm the receipt by patient of cannabis and cannabis products dispensed via caregiver pickup, home delivery and mail order.
3. The dispensary has documented policies and procedures to protect the safety and security of patients and personnel when dispensing medical cannabis via home delivery and mail order.
4. Dispensary personnel implement the dispensing options offered according to documented policies and procedures.

**Examples:**

- *The dispensary posts available strains of cannabis and cannabis products on their website and on a recorded message on their phone.*
- *Patients complete a registration form to designate a caregiver to procure cannabis on their behalf on an on-going basis.*
- *Patients may notify the dispensary to authorize a temporary caregiver to purchase for them for a specific instance.*
- *Following a purchase by a patient's designated caregiver, dispensary personnel contact the patient by phone to confirm receipt or send a purchase receipt by mail or email.*
  
- *Personnel routinely confirm the address of patients accessing home delivery and mail order services.*
  
- *Mail orders are shipped via Canada Post with a signature required on receipt.*
  
- *Cannabis and cannabis products dispensed via home delivery are received by registered patients or a designated caregiver. Personnel verify the identification card of patients receiving home delivery and obtain a signature from the patient on receipt.*
  
- *Personnel transport medical cannabis directly from the dispensary to the courier office, or to the home of the recipient patient.*
- *The dispensary limits the amount of medical cannabis and cannabis products transported by personnel to ensure discretion.*
- *Dispensary personnel undergo training to identify and react to unsafe situations during the transport and delivery of medical cannabis including when to refuse service and when to call for police intervention.*
- *The dispensary accepts payment options, including cash, personal cheque, certified money order, Interac, credit card, or email money transfer.*

**b. Verification of identification****Background:**

As cannabis is a controlled substance, dispensaries must ensure medical cannabis is dispensed only to registered patients. Dispensaries may employ different procedures to identify and verify registered patients. In all cases, including online or over the phone, the patient must consistently present valid identification that supports the verification of their registration and identity. Patient identifiers such as registration numbers, passwords or other patient information may be useful to verify the identity of patients.

**Standard:**

The dispensary verifies the identity of the patient prior to providing services.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for verifying a patient's identity for all dispensing options offered.
2. Dispensary personnel verify patient's identity according to documented policies and procedures.

**Examples:**

- *A dispensary photo identification card is issued for patients to present at dispensary prior to receiving services; cards are updated regularly.*
- *Patients present government-issued photo ID to prove their identity, which is compared with patient information on file.*
- *Patients who place an order by phone or online identify themselves by confirming their dispensary identification number, date of birth, other personal information, or security questions kept on file.*
- *The dispensary provides an identification card to designated caregivers which must be presented when visiting the dispensary on behalf of a patient.*

## 2. Restrictions

**Focus:** Maintaining integrity of dispensary

### a. Quantity restrictions

**Background:**

Research indicates that the daily amount of medical cannabis or cannabis products required by an individual patient to alleviate his or her symptoms is highly variable. The required dosage of cannabis may vary for an individual on a daily, weekly or monthly basis. Irregular or large volume purchases of cannabis or cannabis products may reflect changes in a patient's symptom expression, or may signal over-use, financial considerations, or potentially resale. By creating restrictions for quantities patients may purchase, it is possible for the dispensary to balance patient's needs and personal convenience with concerns regarding the diversion of medicine. General restrictions will apply to most patients. Consultations with a patient and their health care practitioner regarding dosage and method of use are all effective means to gather information that can be used to implement restrictions for individual patients. Consistent tracking of patient purchases by the dispensary is critical to effectively monitor quantity restrictions.

**Standard:**

The dispensary limits purchases of cannabis and cannabis products to 5 equivalent dry weight grams of raw cannabis per day up to a maximum purchase of a month's supply at a time.

**Tests for compliance:**

1. The dispensary has documented policies and procedures regarding quantity restrictions.
2. The dispensary has a documented formula to determine the equivalency of cannabis products to dry weight.
3. The dispensary personnel limit individual client purchase according to policies and procedures regarding quantity restrictions.

**Examples:**

- *The dispensary tracks and regularly reviews patient purchasing patterns.*
- *The dispensary notifies patients when they reach their limit and the date they are eligible for further purchases.*
- *Patients may purchase several days of medical cannabis supply at a time, but are not permitted to return to dispensary for the equivalent number of days.*
- *Equivalencies of dry weight are formulated for resins, edibles, oils and topicals, and these are included in calculating purchase limits.*
- *Patients who require more than 5 equivalent dry weight grams of raw cannabis per day are required to submit a confirmation of the recommended dosage from an eligible health care practitioner.*

**b. Right to refuse service****Background:**

Dispensaries retain the right to refuse service to registered patients in certain circumstances. Service might be refused in the moment or as a result of a process determining consequences for a violation of the rights and responsibilities to which patients have agreed to upon registration. The intention for refusing services may include curtailing behaviour that is disruptive to the safety and security of the dispensary or adhering to other dispensary policies that protect the integrity of the dispensaries operations such as quantity restrictions or patient identification. Concerns for the patient's well-being may also result in a refusal to provide service. Service may be refused during home delivery or mail-order service to protect the safety of dispensary personnel. In all cases, it is important to balance these considerations with patient needs to ensure that a refusal to provide services is never arbitrary or biased.

**Standard:**

The dispensary maintains the right to refuse service.

**Tests for compliance:**

1. The dispensary has documented policies and procedures regarding circumstances in which it will refuse service to a registered patient.
2. The dispensary has documented policies and procedures for informing patients of refusal of services including reason for refusal of service and the duration.
3. Dispensary personnel implement policies and procedures circumstances in which it will refuse service to registered patients service to a registered patient and for informing patients of refusal of services.
4. Dispensary personnel document all instances of refusing services to registered patients, as well as the rationale for doing so.

**Examples:**

- *Patients are refused service for such instances as aggressive or intimidating behaviour, intoxication, reaching quantity limits, lack of appropriate identification, or as part of enforcing a suspension.*

- *Dispensary personnel inform patients of the refusal to provide service in a firm and compassionate manner, utilizing conflict resolution and de-escalation skills.*
- *Dispensary personnel prepare incident reports for any cases where services are refused to registered patients whether onsite or during a home delivery.*

### 3. Dispensing Practices

**Focus:** Maintaining the quality and safety of dispensed products

#### a. Dispensing area

**Background:**

Cleanliness standards are important for any organization responsible for the distribution of medicine. Maintaining a clean environment in areas where product is dispensed is particularly critical for organizations that serve patrons who may have compromised immune systems. In dispensaries, all areas of product contact require regular sanitization maintenance and high traffic areas such as counters and scales demand higher frequency cleaning. Existing guidelines, such as the Food Premises Regulations in British Columbia, outline acceptable protocols to ensure cleanliness of distribution areas and limit contamination of products.

**Standard:**

The dispensary ensures cannabis and cannabis products are dispensed in a clean environment.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to ensure that medicine is dispensed in compliance with relevant food handling regulations.
2. Dispensary personnel implement policies and procedures that ensure medicine is dispensed in a clean environment.

**Examples:**

- *The dispensary maintains specific areas to dispense cannabis and cannabis products.*
- *The dispensary implements cleaning and sanitizing procedures at opening and closing, and on daily, weekly and monthly schedules.*
- *Dispensary personnel complete a checklist to ensure cleanliness tasks are completed on schedule.*
- *The dispensary refers to federal and provincial regulations for food safety and manufacturing practices.*

## b. Handling

### **Background:**

Dispensaries are responsible for maintaining the integrity of the cannabis and cannabis products they dispense to patients. Human contact is recognized to be the most likely source of product contamination. Limiting personnel and patient contact with cannabis can help to prevent instances of contamination. Appropriate precautions include frequent hand or utensil sanitizing, and disposal of used gloves. Due to the fragile nature of cannabis and cannabis products, and the potential loss of quality from rough handling, great care should be taken in handling cannabis at all times. Keeping cannabis and cannabis products in food-safe containers at appropriate temperatures and distributing them in food-safe packaging will also maintain the integrity of the cannabis and cannabis products.

### **Standard:**

The dispensary ensures cannabis and cannabis products are handled in a sanitary and careful manner when dispensed.

### **Tests for compliance:**

1. The dispensary has documented policies and procedures regarding the handling of cannabis and cannabis products.
2. The dispensary personnel handle the cannabis and cannabis products according to policies and procedures.

### **Examples:**

- *Cannabis and cannabis products are handled with clean hands, disposable gloves and/or clean tongs.*
- *The dispensing of cannabis is separated from recording and cash handling transactions.*
- *Patients are not permitted to handle cannabis prior to purchase.*
- *The supply of cannabis to be distributed to patients is kept in food grade containers.*
- *Edible cannabis products to be distributed to patients are refrigerated.*
- *Cannabis and cannabis products are dispensed in food-grade plastic bags or other food grade containers.*

## 4. Accuracy and Transparency

**Focus:** Accurate and transparent dispensing of products

### a. Weighing

#### **Background:**

Dispensaries may weigh cannabis and cannabis products for individual patient purchases or may pre-weigh specific amounts. In either case, accuracy of

measurement is necessary to ensure accountability to patients and maintain accurate product tracking. Using calibrated scales that are regularly maintained and serviced is necessary to ensure measurement accuracy. Accurate and consistent measurement practices by personnel are also equally necessary.

**Standard:**

The dispensary uses accurate scales and consistent measurement practices for dispensing cannabis to patients.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for maintaining the accuracy of scales.
2. The dispensary has documented policies and procedures for accurate and consistent measurement practices.
3. The dispensary personnel maintain accuracy of scales and employ measurement practices according to established policies and procedures.

**Examples:**

- *The weights of cannabis and cannabis products are measured using calibrated scales that are accurate to one one-hundredth of a gram (0.01g).*
- *Scales are re-calibrated at regular intervals.*
- *Dispensary personnel maintain a log of regular scale calibration and maintenance.*
- *Scale has dual display of measurement to allow patients to verify and confirm weights.*
- *Cannabis is weighed to within .01 grams.*
- *Dispensary trains personnel in weighing practices and scale operation.*

**b. Labeling**

**Background:**

Dispensaries can support safe and effective use of cannabis and cannabis products by labeling products with pertinent and accurate information. Information about the quantity of dried cannabis or equivalent dried weight and dosing instructions can assist patients with self-titration. Labels may include results from laboratory testing and information about cannabinoid profiles. However, should not make any unsubstantiated health claims. Cannabis products that contain other ingredients require specific listing of all ingredients and notification of priority allergens (e.g. peanuts, nuts, gluten) as per the Canadian Food and Drug Act. Label information also serves to confirm to third parties that the cannabis or cannabis product was purchased at a dispensary and is intended for medical purposes. Such disclaimers may help to reduce risk of confrontation with law enforcement officials.

**Standard:**

The dispensary ensures that cannabis and cannabis products dispensed to patients are labeled with pertinent and accurate information.

**Tests for compliance:**

1. The dispensary has documented policies and procedures for labeling of cannabis and cannabis products.
2. The dispensary personnel label the cannabis and cannabis products according to established policies and procedures.

**Examples:**

- *Labels are clearly written or printed in the appropriate language(s).*
- *Label information includes: the name of the strain of cannabis or type of cannabis product; batch and lot numbers; quantity of dried cannabis or equivalent dried weight; information about cannabinoid or terpenoid content; listing of any additional ingredients; listing of priority allergens; any other applicable warnings and/or disclaimers; and the packaging date and/or expiry date.*
- *Labels clearly indicate the dispensary where the cannabis or cannabis product was purchased, and that it is intended for medical use and not for resale, as well as applicable warnings, such as “keep away from children” and “do not drive or operate heavy machinery if impaired by cannabis”.*
- *Labels provide instructions for storage, recycling or disposal.*
- *Labels do not include any health or medical claims that are not sufficiently supported by accredited research.*

**c. Packaging**

**Background:**

The packaging of cannabis and cannabis products is an important component to providing safe access to medical cannabis. Considerations for packaging of cannabis and cannabis products that are dispensed to patients by the dispensary include discretion, security, convenience, and environmental impact. As cannabis is a controlled substance, sealed packaging can help indicate it is intended for the patient’s personal use. Sealed packaging ensures that the product is not tampered with between the time it is dispensed and opened by the patient. Properly-sealed packaging can also help minimize cannabis odour as the patient transports the cannabis. It may be convenient for patients to receive cannabis in re-sealable packaging. Patients may request cannabis and cannabis products that they have purchased to be divided into several packages in order to facilitate their dosing. Such requests must be considered on a case-by-case basis and balanced with concern for redistribution. Packaging options that minimize environmental impact are ideal.

**Standard:**

The dispensary packages cannabis and cannabis products in a manner that ensures discretion, security and convenience.

**Tests for compliance:**



1. The dispensary has documented policies and procedures for the packaging of cannabis and cannabis products.
2. Dispensary personnel package cannabis and cannabis products according to established policies and procedures.

**Examples:**

- *The dispensary uses opaque packaging for discretion.*
- *The dispensary uses cellulose or other biodegradable packaging.*
- *The dispensary seals cannabis or cannabis products in scent-proof bags upon request.*
- *Cannabis and cannabis products shipped by mail are vacuum-sealed in opaque packaging and shipped in well-sealed bubble mailers or boxes.*
- *The dispensary sells re-usable containers and encourages patients to use them when subsequently purchasing cannabis.*
- *The total amount of each strain of cannabis purchased is dispensed in one package.*

**d. Sales records**

**Background:**

Accurate sales records and the collection of detailed purchase information are an essential part of accountability and transparency. Such information includes the date and cost of purchases by individual patients, as well as details such as quantity, strain and batch. Sales records can provide important information about product efficacy, help to monitor patients and develop individualized plans, assist in implementing purchase limits, and can be used to evaluate performance of the organization. The collection of accurate sales records and the long-term storage of purchasing data are necessary for accounting and tax purposes. Patients may require this information for personal purposes. For example some devices used for administering cannabis are recognized as medical equipment for income tax purposes.

**Standard:**

The dispensary collects and stores accurate sales records of individual patient purchases.

**Tests for compliance:**

1. The dispensary has documented policies and procedures to collect and store sales records.
2. Dispensary personnel collect and store records of sales according to established policies and procedures.

**Examples:**

- *The dispensary records information from each patient purchase, including strain, batch, quantity, cost, and date purchased.*
- *The dispensary uses a point-of-sale system to track sales records.*

- *The dispensary prints receipts for patients with each purchase or upon request.*
- *The dispensary records any taxes included in the product price or charged on the transaction.*

## V. SUPPLY

**Goal:** A high quality and accountable supply of medical cannabis is consistently available.

### 1. Product Quality

**Focus:** Assuring quality of products and production methods

#### a. Quality control

##### **Background**

Engaging in quality control measures helps dispensaries to ensure that all cannabis and cannabis products meet high standards. Dispensaries can determine quality levels based on known standards for agricultural products or food and herbal preparations. While some laboratories currently test cannabis for dispensaries, the absence of licensing for this work effectively limits the ability of most dispensaries to quantify biological impurities and heavy metals. As such, for most dispensaries, quality and safety testing will be primarily determined through olfactory and visual inspections; which can effectively identify many contaminants. Patient feedback can also help dispensaries determine acceptable quality levels, as ultimately, cannabis and cannabis products must meet patient expectations. It is vital for dispensaries to have a process in place to document and respond to patient reports of poor quality product or adverse effects.

##### **Standard**

The dispensary engages in strict quality control measures to assess quality and identify problems regarding raw cannabis and other cannabis products it dispenses.

##### **Tests for Compliance**

1. The dispensary has documented policies and procedures for quality control of cannabis and cannabis products.
2. The dispensary has policies and procedures for documenting and responding to any reported adverse effects.
3. Dispensary personnel implement policies and procedures for quality control and for documenting and responding to any reported adverse effects.

##### **Examples:**

- *The dispensary establishes acceptable quality levels for all cannabis and cannabis products by consulting manufacturing standards for related products such as herbs and food products.*
- *The dispensary informs contracted suppliers of acceptable quality levels and encourages them to inspect cannabis and cannabis products prior to transport to the dispensary.*
- *The dispensary performs rigorous visual, olfactory and tactile inspection of cannabis and cannabis products, including both macroscopic and microscopic observations with sensory panels to identify any signs of mold spores or mildew, or evidence of other contaminants.*

- *The dispensary utilizes laboratory testing where available to identify levels of heavy metals present, biological impurities, and implements policies regarding allowable quantities of contaminants.*
- *The dispensary records all product batches that fail to meet quality standards.*
- *Cannabis products are made from cannabis that meets quality standards.*
- *The dispensary gathers data regarding adverse events related to different strains and products in a standardized manner to facilitate analysis.*
- *The dispensary responds to problematic material by recalling product and notifying patients who have purchased it.*

## **b. Production methods**

### **Background**

Dispensaries are in a position to regulate the methods of production of cannabis and cannabis products. By providing ongoing support and monitoring, dispensaries can ensure that suppliers meet quality control standards and engage in practices that are not harmful to human health or the environment. Dispensaries may require the use of organic and sustainable production methods or establish best practices of non-organic methods of production. Existing cultivation and manufacturing standards (e.g. Good Agricultural Practices, and Good Manufacturing Practices) can be modeled to establish a framework for medical cannabis production that is comprehensive and promotes ongoing improvements. In general, important considerations for production facility standards are the separation of working zones, overall facility cleanliness, safety of cleaning and disinfection agents, control strategies to prevent and/or mitigate contaminants, safe storage procedures, and proper disposal of waste. Cultivation considerations include environmental control of temperature and humidity, nutrients and chemical agents used, contaminant and pest management, as well as manufacturing procedures for harvesting, drying and curing finished products. By requiring suppliers to ensure that cultivators and kitchen personnel obtain relevant horticultural, agricultural or food-safety licenses and maintain up-to-date certifications, dispensaries can ensure adherence to industry standards.

### **Standard**

The dispensary ensures that production methods mitigate harm to human health and the environment.

### **Tests for Compliance**

1. The dispensary has documented requirements for the production of cannabis and cannabis products.
2. The dispensary has documented policies and procedures to review and approve production methods used by all producers of cannabis and cannabis products.
3. Dispensary personnel implement policies and procedures to review and approve production methods and ensure production requirements are adhered to.

### **Examples**

- *The dispensary consults with horticulture and agriculture professionals to establish acceptable and unacceptable methods of production for cannabis and cannabis products.*

- *Standards for production include nutrients and growing mediums used, pest control practices, humidity levels, and disposal of waste materials.*
- *The dispensary establishes acceptable practices for production of cannabis products including standards for methods of extraction, environment, equipment and ingredients used.*
- *Prospective suppliers submit information outlining current production methods.*
- *The dispensary provides education, support and incentives to encourage the use of organic methods of production of cannabis and cannabis products.*
- *The dispensary develops instructional seminars or training programs to promote recommended methods of production.*
- *The dispensary performs inspections of contracted production facilities to verify adherence to production quality and safety standards.*
- *Suppliers provide quarterly status reports and keep dispensary updated of any changes to production methods.*
- *The dispensary requires cultivators to hold a valid horticultural certificate.*
- *The dispensary requires suppliers of edible cannabis products to report methods of cannabis extract and edible production and to ensure that kitchen personnel hold valid Foodsafe certification.*
- *The dispensary supports suppliers to access laboratory testing of cannabinoid profiles, and contaminants and heavy metals.*

### **c. Storage and packaging**

#### **Background:**

Proper storage and packaging are essential to prevent product spoilage and to ensure that quality standards of cannabis and cannabis products are maintained after initial inspection and acquisition. Monitoring moisture levels, light levels and storage temperatures can help prevent product degradation and maintain the safety and quality of the medicine. Proper product packaging serves to keep the contents fresh, clean, sterile and safe for use during the intended shelf life as well as during transport. Food-grade packaging is typically adequate to protect cannabis and cannabis products from oxygenation, water vapor, dust particles and other contaminants. Products that have been damaged or degraded due to insufficient care may no longer be suitable for distribution to patients.

#### **Standard:**

The dispensary ensures cannabis and cannabis products are stored and packaged to preserve quality.

#### **Tests for compliance:**

1. The dispensary has documented policies and procedures regarding storage and packaging of cannabis and cannabis products.
2. Dispensary personnel store and package the cannabis and cannabis products according to the storage and packaging policies and procedures.

### **Examples:**

- *Cannabis is stored in food-grade containers or plastic bags in a dark, temperature-controlled environment.*
- *Different strains, types of products, and batches are stored in separate containers to prevent cross-contamination.*
- *Perishable cannabis extracts and products are stored according to food-safe guidelines, which may include refrigeration.*
- *The dispensary assigns an appropriate shelf life to cannabis products.*
- *Cannabis and cannabis products are labeled for storage in order to ensure inventory monitoring and adequate rotation, including batch number, quantity, and date of production or purchase.*
- *Cannabis and cannabis products that are contaminated or spoiled are effectively disposed of.*
- *Humidity levels and moisture content of stored dried cannabis are tested prior to storage and are monitored on a regular basis.*

## **2. Inventory Management**

**Focus:** Sufficient variety and quantity, and accountable tracking of products

### **a. Product variety and quantity**

#### **Background**

It is vital for dispensaries to maintain a sufficient variety and quantity of cannabis and cannabis products available to meet patient needs. Establishing an effective inventory management system helps ensure that a wide selection of cannabis and cannabis products are consistently available. There are several important factors to consider when developing an inventory management system, including purchasing patterns, carrying costs, economies of scale, supplier schedules, and potential time lags in the supply chain. An effective system must be robust and flexible to accommodate uncertainty in the demand, supply and transfer of cannabis and cannabis products. Security concerns are a consideration for determining overall quantity maintained on-site.

#### **Standard**

The dispensary retains a sufficient variety and quantity of cannabis and cannabis products to fulfill patient needs.

#### **Tests for Compliance**

1. The dispensary has policies and procedures to ensure there is a sufficient variety and quantity of cannabis and cannabis products.
2. Dispensary personnel implement policies and procedures for ensuring sufficient variety and quantity of cannabis and cannabis products.

## Examples

- *The dispensary has an inventory management system to track past purchases and predict current and future demand.*
- *The dispensary monitors average daily, weekly, and monthly sales and sales patterns to ensure sufficient supply of cannabis.*
- *The dispensary designates personnel responsible for inventory ordering and restocking.*
- *The dispensary utilizes a point-of-sales system to track inventory.*
- *The dispensary maintains and reviews supplier contracts, including details about products or strains, quantities, and expected dates of delivery.*
- *The dispensary produces, or contracts suppliers to provide, a variety of cannabis strains or cannabis products that best serve the needs of patients.*

## b. Product tracking

### Background

Product tracking is critical to a dispensary's ability to provide dependable access to patients.

Effective product tracking involves implementing systematic methods to account for products at different stages of transfer. This includes products that are received from suppliers, moved within the dispensary, and distributed to patients. Such tracking includes detailed production and sales records, as well as records of all disposed cannabis and cannabis products. Maintaining accurate records demands regular monitoring of product quantities and reconciling of accounts to include details of any discrepancies.

### Standard

The dispensary tracks cannabis and cannabis products at each stage of transfer.

### Tests for Compliance

1. The dispensary has policies and procedures to track cannabis and cannabis products at each stage of transfer.
2. Dispensary personnel implement policies and procedures to track cannabis and cannabis products at each stage of transfer.

## Examples

- *The dispensary labels and records information about cannabis and cannabis products upon receipt, including strain or product name, supplier, batch number, quantity and date of purchase.*
- *The dispensary implements a chain of custody for the transfer of cannabis and cannabis products.*
- *All dried cannabis is quantified by weight to an accuracy of one tenth of a gram.*

- *Cannabis products are quantified by units or by equivalent dried weight of cannabis.*
- *Working inventory of cannabis and cannabis products for sale is separated from stored inventory.*
- *The dispensary implements a system to track loss of product due to reduced humidity or removal of stems.*
- *Inventory is verified and reconciled daily, and any discrepancies are recorded with the reason for the discrepancy (providing an audit trail).*

### 3. Supply Accountability

**Focus:** Due diligence for supply of cannabis and cannabis products

#### a. Eligible recipients

##### **Background**

To ensure a reliable supply of cannabis and cannabis products, some dispensaries may choose to produce their entire supply of cannabis and cannabis products. Other dispensaries may acquire their supply from contracted suppliers external to the dispensary, while others may utilize a combination of supply sources. In all cases, the dispensary is in a position to ensure that the cannabis and cannabis products produced are used for medical purposes. The dispensary, and contracted suppliers, can create a closed-loop of medical cannabis supply by restricting their supply to eligible recipients including CAMCD-certified dispensaries, CAMCD or Health Canada authorized research and development projects and patients that individual cultivators are designated to produce for as per the MMAR.

##### **Standard**

The dispensary and contracted suppliers exclusively supply CAMCD-certified dispensaries or other eligible recipients.

##### **Tests for Compliance**

1. The dispensary has documented policies and procedures stipulating that they will supply cannabis and cannabis products exclusively to CAMCD-certified dispensaries or other eligible recipients.
2. The dispensary has documented policies and procedures stipulating that contracted suppliers will exclusively supply CAMCD-certified dispensaries or other eligible recipients.
3. Dispensary personnel implement policies and procedures stipulating that the dispensary and contracted suppliers exclusively supply CAMCD-certified dispensaries or other eligible recipients.

##### **Examples**

- *The dispensary supplies cannabis and cannabis products it produces to other certified dispensaries.*



- *The dispensary supports contracted suppliers to supply excess cannabis or cannabis products to other CAMCD-certified dispensaries.*
- *The dispensary restricts the quantity of cannabis produced by contracted suppliers to ensure the dispensary's ability to purchase.*
- *The dispensary maintains contracts with a number of small suppliers to maintain strain and product diversity and protect against crop failure.*
- *Contracted suppliers agree to supply cannabis or cannabis products only to CAMCD-certified medical cannabis dispensaries and/or individual patients for whom they are designated producers under the MMAR.*
- *Suppliers provide cannabis or cannabis products for research and development projects, such as Section 56 authorized projects.*
- *A contracted supplier who supplies cannabis or cannabis products to an ineligible recipient i.e. a recipient not approved or confirmed by the dispensary results in termination of the supply contract.*

## **b. Contracts**

### **Background**

Entering into contracts with all suppliers of cannabis and cannabis products provides a framework for dispensaries to ensure that production standards and accountability requirements are upheld. By stipulating goals and expectations regarding quantity, quality and safety standards, as well as exclusivity and reporting requirements, the contract clarifies negotiated agreements. A well-planned contract will also address the risk and reward of involvement, as well as conflict resolution strategies. Effective contracts can be relied upon by both parties to protect the relationship, and can provide credibility to 3<sup>rd</sup> parties.

### **Standard**

The dispensary enters into written contracts with suppliers from whom they acquire cannabis or cannabis products.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures for entering into contracts with suppliers from whom they acquire cannabis and/or cannabis products.
2. Contracts stipulate quantity, quality and safety standards, and reporting and exclusivity requirements.
3. Dispensary personnel ensure that policies and procedures for entering into contracts with suppliers are implemented.

### **Examples**

- *Potential contracted suppliers submit a CV, as well as relevant certificates and references, and participate in an interview process before being offered a contract.*
- *The dispensary enters into 1-year contracts with suppliers of cannabis and/or cannabis products to be reviewed and renewed annually.*

- *The dispensary utilizes 3 month probationary or trial contracts to ensure the professionalism of new suppliers.*
- *Terms of contracts include quantity of cannabis or cannabis products to be supplied, quality assurances, production methods, reporting requirements, billing and tax requirements, as well as consequences for failure to meet the terms of the contract.*
- *Contracted suppliers agree to supply cannabis or cannabis products only to CAMCD-certified medical cannabis dispensaries and individual patients for whom they are designated producers under the MMAR.*
- *Contracts include terms by which both parties may break, cancel or annul the contract.*
- *Contracts include agreements for inspections of production methods, records, and facilities.*
- *The dispensary verifies all contracts upon request of contracted suppliers.*

### **c. Reporting responsibilities**

#### **Background**

Regular reporting from contracted supplier is an effective tool to monitor adherence to established standards and assess progress towards mutual goals. Important considerations for reports include records of product tracking, changes to production facility or production methods, and plans or projections for the subsequent period. Dispensaries can use the reported information and any associated feedback from suppliers to evaluate the accountability of the production and supply system. While regular reports can provide valuable information, reporting responsibilities should balance the dispensary's need for transparency and accountability with the potential increase in workload on suppliers.

#### **Standard**

The dispensary requires all suppliers to provide reports related to the quantity, quality and safety of cannabis and cannabis products they supply.

#### **Tests for Compliance**

1. The dispensary has documented policies and procedures for supplier reporting requirements.
2. Dispensary personnel ensure that reporting requirements for suppliers are implemented.

#### **Examples:**

- *Suppliers submit quarterly reports of inventory management showing inventory flows, as well as any changes to production facilities and methods.*
- *Suppliers supply the dispensary with proof of sales and income tax remittance to the relevant tax agency.*
- *Suppliers track quantities of cannabis and cannabis products and keep records of all sales.*

- *Suppliers submit annual reports to the dispensary for review.*
- *Suppliers document loss of cannabis or cannabis products due to contamination, degradation, or other spoilage.*

## VI. SAFETY, SECURITY AND PRIVACY

**Goal:** Dispensaries maintain adequate safety and security measures to protect the welfare of patients, personnel, and the community

### 1. Healthy Environment

**Focus:** Establishing and maintaining a healthy environment

#### a. Infection control

##### **Background**

Infection control is an important concern for all organizations working with patients who may have compromised immune systems or communicable conditions. Various legislation and guidelines have been published outlining precautions to reduce the risk of transmission of infectious diseases. These include specific practices for hand hygiene, precautions for airborne, droplet and contact transmission, exposure to blood-borne infections, safety of the general environment and waste disposal. Adherence to precautionary practices protects the dispensary's personnel, patients and the community.

##### **Standard**

The dispensary abides by universal precautions for infection control.

##### **Tests for Compliance**

1. The dispensary has documented policies and procedures for adhering to universal precautions for infection control.
2. Dispensary personnel implement documented policies and procedures for adhering to universal precautions for infection control.

##### **Examples:**

- *Infection control policies include procedures for the safe handling and dispensing of medicines.*
- *Hand hygiene policies are clear and posted in washrooms and kitchens.*
- *Soap and alcohol-based hand sanitizers are available to personnel and patients in waiting rooms, washrooms and dispensing areas.*
- *Personnel demonstrate universal precautions when interacting with other personnel and patients.*
- *Personnel always wear gloves when interacting with blood, vomit, urine, feces or any other bodily fluids, and cleaning materials are either safely disposed of or thoroughly disinfected.*
- *Personnel and patients are prohibited from coming to work with exposed wounds, sores or communicable infections.*
- *Masks are available to any personnel and patients that demonstrate a serious cough or sign of pulmonary infection.*

- *Paid sick days are provided to dispensary employees.*
- *The dispensary is cleaned at the end of every day, including cleaning and disinfecting of surfaces and objects.*
- *Safe use practices regarding the sharing of implements are promoted on posters or handbills in the waiting room or in the dispensing area.*
- *The dispensary provides personnel with training related to maintaining a healthy environment, including infection control procedures.*

## **b. Emergency preparedness**

### **Background**

Dispensaries, like other organizations, are at risk from potential emergencies. These include natural disasters, fires, accidents, energy disruptions and sabotage. Emergencies may pose risks to patients and personnel and there may be further particular risks for individuals with disabilities. Additionally, there may be risks to the functioning of the dispensary, which poses a concern since the health of many patients depends on uninterrupted and predictable access to a safe source of medical cannabis. Emergency preparedness includes all activities, such as plans, procedures, contact lists and exercises undertaken in anticipation of an emergency.

### **Standard**

The dispensary is prepared to respond to health, security, fire, natural disasters and other emergencies.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures for responding to health, security, fire, natural disasters and other emergencies.
2. Dispensary personnel implement documented policies and procedures for responding to health, security, fire, natural disasters and other emergencies.

### **Examples:**

- *First Aid supplies are well-marked, regularly inspected and readily available.*
- *Personnel have valid, current Emergency First Aid training funded by the dispensary and renewed as necessary.*
- *The dispensary provides personnel first aid training for specific conditions (eg. epilepsy).*
- *The dispensary has equipment such as defibrillator machines and EpiPens, and trains personnel on their use.*
- *All dispensaries have well-marked emergency exit signs and printed evacuation plans visible in rooms frequented by patients.*

- *Personnel are trained in emergency evacuation procedures.*
- *Panic buttons are installed for personnel to use in the event of an emergency that warrants police support.*

## c. Restroom facilities

### Background

Generally, it is essential for restroom facilities to be available for both personnel and patients at the dispensary. Some patients may require immediate access to a toilet facility as a result of their medical condition. As a health care organization, it is vital that the restrooms be clean and accessible to all patients and personnel.

### Standard

The dispensary ensures access to clean restroom facilities for personnel and patients.

### Tests for Compliance

1. The dispensary provides clean restroom facilities for patients and personnel on-site or provides clear notice of location of public washrooms in close proximity.
2. The dispensary ensures all patients and staff are aware of the location of restrooms that are available to them.

### Examples:

- *Restrooms have appropriate signage and are identified for new patients upon registration.*
- *Washrooms are checked regularly by staff and cleaned thoroughly at least once per day.*

## d. On-site medication use

### Background

Some dispensaries may choose to permit patients to use cannabis and cannabis products on-site. There are a variety of reasons for providing this option, including allowing patients to test medication prior to purchase, addressing the need of some patients to have a space to take their medication, or allowing use in the case of timely need to address symptom management. An on-site space for medication use can also be valuable in demonstrating and discussing safe use for inexperienced patients. Designated on-site consumption spaces may create opportunities for community-building through patient interaction. When allowing for on-site medication use it is important to consider other patients, personnel, and the community. Considerations include adequate venting, prevention of second-hand exposure for personnel and patients, applicability of municipal smoking by-laws or other workplace legislation, and legal liability if a patient

drives while intoxicated after leaving the dispensary.

### **Standard**

Dispensaries that permit the use of cannabis and cannabis products on-site take measures to ensure individual, dispensary and community health and safety.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures regarding on-site medication use for addressing individual, dispensary and community health and safety.
2. Dispensary personnel implement policies and procedures for addressing individual, dispensary and community health and safety.

### **Examples:**

- *Dispensary personnel offer patients training on safer use techniques and displays information on safer use techniques in areas designated for on-site medication use.*
- *Dispensary personnel provide demonstrations on the use of vaporizers and vaporizers are provided for patients to use on-site.*
- *The dispensary provides sanitizing agents for pipes and vaporizers in on-site use areas.*
- *The dispensary displays information about the potential risks from sharing joints or other smoking implements.*
- *The dispensary ensures that on-site use areas are adequately ventilated.*
- *The dispensary posts signs reminding patients not to drive if impaired and listing phone numbers for taxi services and the location of nearby public transit stops.*
- *Dispensary personnel check if there is visible cause for concern before the patient leaves the dispensary.*

## **e. Health and safety regulations**

### **Background**

Dispensaries strive to provide high-quality medical services, and the continued health and safety of staff and patients is a fundamental goal to be reflected in all relevant policies and procedures. Documented health and safety procedures may also serve to protect individuals, the dispensary and the community who are impacted by the workplace environment. The ideal health and safety approach is a cross-disciplinary one that may include interactions from many different areas, including public health, occupational medicine and hygiene, and safety engineering. Developing an effective health and safety plan requires first identifying all relevant health and safety regulations, which can vary widely between provinces and municipalities within Canada. Regulations may include requirements relating to the reporting of injuries, diseases and dangerous occurrences, as well as first aid regulations, compliance with fire and building codes, and site inspections.

## **Standard**

The dispensary complies with all applicable municipal, provincial/territorial, and federal health and safety requirements.

## **Tests for Compliance**

1. The dispensary has documented all applicable municipal, provincial/territorial and federal health and safety requirements.
2. The dispensary has documented policies and procedures for adhering to all applicable municipal, provincial /territorial, and federal health and safety requirements.
3. Dispensary personnel ensure that documented policies and procedures for adhering to all applicable municipal, provincial/territorial and federal, health and safety requirements are implemented.

## **Examples:**

- *The dispensary maintains a log of all incidents relating to health and safety and, where required, submits reports to the relevant regulatory body.*
- *The dispensary regularly evaluates the efficacy of its implemented health and safety plan.*
- *The dispensary regularly incorporates any relevant new legislation into its health and safety plan.*
- *The dispensary posts signs indicating legal building capacity.*

## **2. Safe Conduct**

**Focus:** Ensuring a safe environment for all patients and personnel

### **a. Incident Management**

#### **Background**

Conflicts can arise between personnel, between personnel and patients, and between patients in any healthcare organization. Developing well-considered incident management strategies and ensuring that personnel are well-trained in these approaches can proactively reduce potential conflicts in a dispensary and can mitigate potential negative impact on personnel, patients and the dispensary.

#### **Standard**

The dispensary is prepared to respond to incidents that have the potential to affect the health and safety of patients, personnel and the community.

#### **Tests for Compliance**

1. The dispensary has documented policies and procedures for incident management.
2. Dispensary personnel implement documented policies and procedures for incident management.

#### **Examples:**



- *Incident management including conflict resolution and de-escalation training are provided to personnel as part of personnel training.*
- *Policies on when to call for police intervention are clearly documented and known by personnel.*
- *Personnel are instructed on how to respond to inter-patient and inter-personnel conflict.*
- *Dispensary personnel meetings are held regularly and personnel are encouraged to address discord and supported to find appropriate remedies or resolutions.*
- *Signs are posted in the dispensary outlining expected conduct, including non-discriminatory language and behaviour, and the right of all patients to a safe and respectful environment.*

## **b. Consequences for Infractions**

### **Background**

Upon registration, patients sign a Rights and Responsibilities agreement and are informed of consequences for infractions. Infractions may directly or indirectly impact safety and security. For example, a patient may engage in behaviour that is disruptive to operations, the safety of other patients or personnel, or threatening to the existence of the dispensary. It is important for dispensaries to implement consequences to maintain the safety and security of the dispensary by stopping the unwanted behaviour, as well as demonstrating their commitment to their policies. Consequences may include loss of access to some or all services, either permanently or temporarily. Consequences must be fair and the process for determining them transparent, and there must be recourse for appeal.

### **Standard**

The dispensary implements fair and transparent consequences for infractions.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures for providing consequences for infractions.
2. The dispensary has documented policies and procedures for informing patients of the process to appeal consequences.
3. Dispensary personnel implement policies and procedures for providing consequences for infractions and informing patients of the process to appeal them.

### **Examples:**

- *The dispensary develops a list of infractions and related consequences, including progressive consequences for repeat infractions.*
- *The dispensary forms a disciplinary committee that reviews infractions and assigns consequences.*
- *Dispensary has a conflict resolution panel with personnel, board and patient representatives to review appeals of consequences for infractions.*

- *Information about the infraction includes a description of the incident, record of date and time, and reasoning for consequence.*
- *Details about the consequence, including restrictions to services and their duration, are explained to the patient, as well as courses of appeal.*
- *Patients who visit the dispensary while intoxicated are assigned a one-day suspension.*

### 3. Security and Privacy Measures

**Focus:** Effective security and privacy of sensitive information

#### a. Security systems

##### **Background**

Due to a variety of reasons including the status of cannabis as a controlled substance, the financial value of cannabis, and the presence of sensitive personal medical information and cash at dispensaries, it is important that adequate security measures be in place. The implementation of adequate security systems can minimize the likelihood of theft or robbery and also greatly decrease the impact to patients, the dispensary and the community in such an event.

##### **Standard**

The dispensary ensures adequate security measures for all dispensing locations and production facilities.

##### **Tests for Compliance**

1. The dispensary has established and documented appropriate security-related policies, procedures, and infrastructure at all dispensing and production-related locations.
2. The dispensary has documented policies and procedures for informing patients, personnel and the community of any security measures (e.g. surveillance) that may impact personal privacy.
3. Dispensary personnel ensure security-related policies and procedures are implemented and regularly monitored.

##### **Examples:**

- *The dispensary installs on-site and remote interior and exterior surveillance systems.*
- *Alarm systems include contact, glass-break, and motion alarms.*
- *The dispensary installs security bars on windows.*
- *The dispensary utilizes locked safes for medicine and cash.*
- *The dispensary utilizes locked cabinets for client-related medical and personal information.*
- *The dispensary installs deadbolt locks on exits.*

- *The dispensary employs on-site security guards.*
- *The dispensary schedules security audits by police or other security professionals.*
- *Personnel practice and are familiar with policies and procedures regarding protecting themselves and patients in the event of a theft or robbery.*
- *The dispensary clearly outlines and implements methods for the safe transfer and storage of cash and inventory.*

## **b. Management of sensitive information**

### **Background**

Effective management and oversight of sensitive information is vital to the safety and security of any organization. The dispensary has a responsibility to its patients, personnel and community to minimize risks to their safety and security, as well as to prevent disruption of services. When developing policies for the management of sensitive information, important considerations are first the identification of the security level of information collected and stored by the dispensary, how different levels of sensitive information will be collected and stored, as well as accessibility to personnel within the dispensary, and whether and with whom information can be shared. By developing procedures that are comprehensive, systematic and reliable, the dispensary can establish an effective framework for information security of all types and at all levels.

### **Standard**

The dispensary keeps strict control over information that could affect the safety and security of patients, personnel, the dispensary and the community.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures regarding the management of sensitive information.
2. Dispensary personnel implement documented policies and procedures regarding the management of sensitive information.

### **Examples:**

- *The dispensary has identified the security levels of various information, how it is collected and stored, and by whom.*
- *Personnel policies clearly state degree of access to sensitive information, such as alarm codes, sales records, and inventory asset information.*
- *Personnel with security clearance to sensitive information sign a non-disclosure agreement or confidentiality contract.*
- *The dispensary designates personnel as an information security officer to oversee consistent implementation of procedures.*
- *The dispensary maintains a log of incidents relating to management of sensitive information.*
- *The dispensary clearly outlines and implements methods for safeguarding private information of suppliers and production facilities.*
- *Identifying information never leaves the building in any form (i.e.. is not stored on laptops or usb drives).*
- *The dispensary has a clear policy regarding destruction of data, including scheduled deletion of video surveillance.*

- *Passwords and other security codes are changed and access to information removed when personnel leave employment.*
- *Software protocols ensure an audit trail of use (i.e. log-in records)*
- *Damage control policies are in place in the event information is lost, stolen or becomes public.*
- *The dispensary has their own server on-site as well as back up systems off-site in a highly secure environment.*
- *The dispensary avoids the use of cloud-based systems and/or servers based out of the country for storage of databases and other information.*

## **c. Privacy and confidentiality**

### **Background**

Confidentiality and privacy are extremely important when providing medical services. Patients place great trust in dispensaries when providing documentation of their medical conditions and other personal information. Breaches can drastically impact a patient's life as well as affect the necessary trust required between the patient and the dispensary, and between the dispensary and the community-at-large. Privacy and confidentiality includes the handling and storage of documents, and verbal communication of information. Dispensaries should comply with accepted standards of privacy and confidentiality for health care organizations. Federal privacy legislation called the Personal Information Protection and Electronic Documents Act (PIPEDA) governs the collection, use, and disclosure of personal information by health care providers, unless there is substantially similar provincial or territorial legislation.

### **Standard**

The dispensary keeps all patient information confidential and secure.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures to protect the privacy and confidentiality of patients in accordance with all relevant privacy regulations.
2. The dispensary has documented policies and procedures to communicate privacy and confidentiality policies and procedures to patients.
3. Dispensary personnel implement policies and procedures to protect the privacy and confidentiality of patients and communicate with patients about these measures.

### **Examples:**

- *The dispensary securely stores patient information (both physical and digital).*
- *The dispensary trains personnel in policies and procedures for maintaining the security and confidentiality of patient information.*
- *Personnel sign confidentiality agreements.*
- *The dispensary informs and obtains consent from patients regarding how personal information that is collected will be protected, how it will be*

*used, with whom it will be shared, as well as their right to access their personal health information and to have amendments made.*

- *Dispensary obtains consent from patients for the use of non-identifying anonymous data for the purposes of research or education.*
- *The dispensary obtains consent from the patient prior to disclosing any personal information to third parties.*
- *The dispensary ensures the proper destruction of information that is no longer necessary to retain.*
- *The dispensary verifies the patient's identity before disclosing any confidential information.*
- *The dispensary engages in 3<sup>rd</sup> party privacy audits.*
- *The dispensary is aware of privacy requirements from funding sources, such as governmental or granting bodies.*

## VII. EFFECTIVE ORGANIZATION

**Goal:** To provide effective, efficient and ethical governance and leadership, with a focus on the purpose of the organization and positive outcomes for patients, personnel and the community.

### 1. Governance and Management

**Focus:** Defining governance structure and managing records, finances, risks and performance

#### a. Governance

##### Background

Depending on the dispensary's organizational model, each dispensary will have a different governance structure. Well-defined roles and decision-making processes are necessary in order to provide accountability to patients, personnel, and the community.

##### Standard

The dispensary has a clearly-defined governance structure.

##### Tests for Compliance

1. The dispensary has a documented governance structure including roles, responsibilities and decision-making process.
2. The dispensary operates according to the documented governance structure.

##### Examples:

- *The dispensary demonstrates awareness of the responsibilities and liabilities of directors - e.g. provides director training.*
- *The dispensary has an organizational chart, table of organization, or narrative descriptions of positions and lines of authority within the organization.*
- *The dispensary utilizes a well-defined mission, vision, values and direction that is regularly reviewed and updated by patients, personnel and administration.*
- *The dispensary has written policies, by-laws, or job descriptions that define functions and roles of personnel.*
- *The dispensary has a clear demarcation of duties between governing boards and executive leadership.*
- *Dispensary personnel demonstrate understanding of overall corporate responsibilities by personnel and administration.*
- *The dispensary has a written ethical code of conduct and procedures to*

- deal with violations of ethical codes.*
- The dispensary has a 'whistle-blower' policy, where there is no reprisal for reporting concerns and a stated time frame to initiate review of concerns.*

## **b. Record keeping**

### **Background**

Dispensaries hold a large volume of medical, accounting and other information that is shared with them by patients, staff and others who engage with them. This information is important to the operations of the dispensary. Precautions must be taken to avoid any loss of information or breaches of confidentiality.

### **Standard**

The dispensary has appropriate safeguards to protect and avoid loss of administrative records.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures regarding safeguarding records.
2. The dispensary implements policies and procedures regarding safeguarding records.

### **Examples:**

- The dispensary organizes and stores records in a systematic fashion.*
- The dispensary designates one or more personnel to be responsible for controlling records.*
- The dispensary develops procedures and physical safeguards to ensure only authorized personnel have access to records.*
- The dispensary utilizes procedures and physical infrastructure to protect confidential information and secure records against fire, water damage, and other potential loss or damage.*
- The dispensary has a routine procedure for back-up of electronic records.*
- The dispensary has policies and procedures regarding the retention and destruction of records in compliance with federal and provincial/territorial laws.*

## **c. Financial management and reporting**

### **Background**

Financial management practices include an effective system of internal and external controls to ensure proper financial recording and accurate accounting. While these are important for any health care organization, due to the current legal framework for cannabis and current regulatory framework for medical cannabis, well-considered financial practices and financial accountability and

transparency are of utmost importance for dispensaries.

### **Standard**

The dispensary engages in financial management and reporting.

### **Tests for Compliance**

1. The dispensary prepares budgets prior to the fiscal year that include projections of revenues and expenditures.
2. The dispensary disseminates budgets to and receives approval from appropriate personnel.
3. The dispensary establishes fiscal policies and procedures, including control practices.
4. The dispensary implements fiscal policies and procedures.

### **Examples:**

- *The dispensary acquires guidance from accounting professionals to confirm practices are in accordance with legal requirements and follow generally accepted accounting practices.*
- *The dispensary has formal meetings to discuss budget - e.g. the dispensary establishes a finance committee, or gains approval for budget items at regular Board of Directors or advisory board meetings.*
- *The dispensary has regular (monthly or quarterly) reviews of revenue, expenses, and internal and external trends/challenges and opportunities.*
- *The dispensary identifies and reviews financial solvency with remediation plans if necessary.*
- *The dispensary regularly reviews its fee structure for patients.*
- *The dispensary maintains evidence of annual review or audit of financial statements conducted by an independent professionally-certified accountant.*

## **d. Insurance and Risk Management**

### **Background:**

It is vital for any organization to identify potential risks and liabilities to their operation and to establish strategies to mediate these risks. Risks and liabilities include civil and criminal legal challenges, as well as financial and structural losses.

### **Standard**

The dispensary identifies and manages risk and implements action to reduce risk.

### **Tests for Compliance**

1. The dispensary has a documented risk management plan.
2. The dispensary annually reviews its risks and adjusts its risk management plan accordingly.
3. The dispensary implements its risk management plan.



**Examples:**

- *The dispensary has appropriate and comprehensive insurance coverage.*
- *The dispensary has policies and procedures to systemically identify and review potential risks.*
- *The dispensary develops and implements risk management planning systems.*
- *The dispensary engages 3<sup>rd</sup> party risk identification and management appraisals.*
- *The dispensary employs well-defined security protocols.*
- *The dispensary has strategic financial savings to allow for effective risk recovery.*
- *The dispensary has a legal fund and a qualified legal council on retainer*

**e. Performance management****Background:**

Performance reviews can effectively aid organizations to measure the effectiveness of their strategies. These reviews are of great benefit to long-term planning and useful to determine the overall cost-effectiveness of past and present strategies. Performance reviews should identify both positive and negative organizational practices.

**Standard**

The dispensary monitors and measures its performance and adapts its strategies for unforeseen events.

**Tests for Compliance**

1. The dispensary establishes performance indicators that are observable, measurable and achievable.
2. The dispensary collects data and assesses progress in regards to performance indicators on an ongoing basis.

**Examples:**

- *The dispensary has a systemic process to outline desired performance outcomes and to assess progress.*
- *Performance reviews are conducted annually.*
- *Patient and personnel satisfaction surveys are conducted regularly and tracked for progress.*
- *The dispensary conducts regular analysis comparing budget goals with actual financial outcomes.*

- *The dispensary has a goal-oriented rewards systems for personnel.*

## 2. Legal and Regulatory Compliance

**Focus:** Compliance with all applicable legal and regulatory requirements

### a. Federal, provincial/territorial and municipal regulations

#### **Background:**

It is important that certified dispensaries meet all relevant regulatory requirements. This includes requirements for zoning, health and safety, privacy and confidentiality, labour and workplace safety, licensing, contractual agreements, corporate status, and employment practices. Adopting policies and practices that comply with regulations at all levels of government will support the integration of dispensaries into established regulatory frameworks and reduce social stigma surrounding medical cannabis use and access.

#### **Standard**

The dispensary is in compliance with all applicable municipal, provincial/territorial and federal regulations.

#### **Tests for Compliance**

1. The dispensary demonstrates knowledge of applicable laws and regulations.
2. The dispensary has documented policies and procedures that comply with applicable laws and regulations.
3. Dispensary personnel implement policies and procedures that comply with applicable laws and regulations.

#### **Examples:**

- *The dispensary establishes a process to identify and comply with applicable laws and regulations from all levels of government.*
- *Licenses, certificates and permits are displayed in relevant work or public areas.*
- *The dispensary retains documentation of inspections and status reports.*

### b. Applicable taxes

#### **Background:**

An important part of complying with applicable municipal, provincial/territorial and federal regulations is the remittance of all applicable taxes. Paying taxes results in compliance with the law and demonstrates that dispensaries provide financial benefit to Canadian society and the communities that they work within. This is a positive step towards mainstream acceptance.

**Standard:**

The dispensary remits all applicable taxes from the sale of goods and services to the relevant revenue agencies.

**Tests for compliance:**

1. The dispensary has evidence of remitting taxes to the relevant revenue agencies.

**Examples:**

- *The dispensary retains its notice of income tax assessment from the Canada Revenue Agency.*
- *The dispensary maintains proof of CPP and EI remittances.*
- *The dispensary retains proof of payment of municipal taxes (i.e. property taxes) where applicable.*
- *The dispensary retains a statement from an accredited accountant that the society is in good financial standing in regards to taxation.*
- *The dispensary charges applicable taxes on implements for cannabis administration.*

### 3. Accountability to Patients

**Focus:** Ensuring patient-centred care

#### a. Rights of patients

**Background:**

Patients have certain rights, such as the right to safety and confidentiality. Some dispensaries may confer additional rights to patients. It is therefore important that patients be made fully aware of their rights so they may have accurate expectations of the dispensary's role in respecting and protecting these rights. The rights of patients comprise a transparent set of guarantees that the dispensary establishes as normative conduct in the dispensary environment and seeks to safeguard as an integral and accountable part of providing high quality care to patients.

**Standard**

Rights of patients are communicated to them prior to beginning services, and annually, and are available for review and clarification.

**Tests for Compliance**

1. The dispensary has documented policies and procedures for communicating rights to patients.
2. The dispensary has documented policies and procedures for ensuring rights are available for review and clarification.

3. Dispensary personnel implement policies and procedures for communicating rights to patients and ensuring rights are available for review and clarification.

#### **Examples**

- *A printed copy of the patient's rights is provided to the patient at registration.*
- *A printed copy of the patient's rights is posted in the dispensary waiting room.*
- *A copy of the patient's rights is available on the dispensary's website.*
- *Personnel provide a printed copy of the patient's rights upon request.*
- *Repercussions for infringement of patient's rights are clearly defined in documentation.*
- *The dispensary has a patients bill of rights.*

## **b. Patient Engagement**

### **Background:**

The success of any dispensary is directly related to the organization's ability to understand and meet the needs of the patient population it serves. By engaging patients and ensuring that the voice of patients informs short and long-term policy decisions, the dispensary can stay strategically focused on meeting patient needs and consider the impact of activities, policies and procedures on patients.

### **Standard**

The dispensary seeks and is responsive to input from patients on an on-going basis.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures for seeking input from patients on an ongoing basis.
2. The dispensary has documented policies and procedures for analyzing and responding to input from patients.
3. Dispensary personnel implement policies and procedures for seeking, analyzing and responding to input from patients.

### **Examples:**

- *The dispensary conducts regular patient satisfaction surveys.*
- *The dispensary holds patient focus groups.*
- *The dispensary has an anonymous comments box on-site, which is checked regularly and considered.*
- *The dispensary's Constitution and/or other governance policies ensure a high level of patient participation on their board of directors or advisory board.*
- *The dispensary employs patients as personnel or volunteers.*
- *The dispensary assesses the needs of patients not accessing services to ensure equitable access.*

## c. Complaints process

### Background:

Even in the best-run dispensaries, there is always a chance that a patient will have a complaint. These may be a result of problems with products or services provided by the dispensary, the dispensary environment, personality clashes, disagreements, misunderstandings with dispensary personnel, or other factors. Complaints can be a valuable source of feedback from patients and it is in the best interest of the patient as well as the dispensary to make every attempt to address and resolve complaints. A transparent formal complaints process provides an objective framework to effectively address and resolve complaints.

### Standard

The dispensary has a transparent system for hearing and addressing patients' complaints and concerns.

### Tests for Compliance

1. The dispensary has documented policies and procedures to review and address patient complaints.
2. Dispensary personnel communicate the process for complaints to patients.
3. The dispensary has a physical location where patients can communicate directly with dispensary personnel and ensures this location and its hours are known to patients.

### Examples

- *The dispensary maintains written documentation of complaints, investigations, findings and outcomes.*
- *The complaints process is explained to the patient upon registration and reviewed as requested or required.*
- *The complaints process includes courses of appeal.*
- *The personnel who review complaints are identified to patients.*

## 4. Personnel and Employment Practices

*Focus: Responsible management and training of personnel*

### a. Qualifications and training

#### Background

Qualified and well-trained personnel are critical to the quality of care provided to patients and to the overall functioning of the dispensary. Personnel include employees, volunteers and consultants. It is the responsibility of the dispensary to ensure that those providing services are qualified to perform their duties competently and safely, whether they are providing peer-based care or have a background in healthcare. Qualifications include knowledge of products, customer service, skills to deal with potential emergencies, experience with persons with disabilities, and understanding the range of socio-economic contexts in order to provide respectful individualized services. It is important that relevant personnel can engage in dialogue with both patients and health care practitioners about patient care. Necessary knowledge and skills may be a part of the

individual's prior education and experience, or may be acquired through training in areas that require specific expertise. Since personnel are working with a controlled substance, it is prudent for dispensaries to abide by the legal age of majority in their province or territory for all personnel. (Appendix A)

### **Standard**

The dispensary ensures that personnel providing services are qualified to perform duties competently and safely and are of the legal age of majority.

### **Tests for Compliance**

1. The dispensary has documented policies and procedures for necessary skills and competencies required by personnel according to their role.
2. The dispensary has documented policies and procedures to verify the background and credentials of personnel prior to employment and thereafter as necessary.
3. The dispensary has documented policies and procedures to evaluate the competency of personnel.
4. The dispensary has documented policies and procedures to ensure personnel are adequately oriented and trained, both prior to providing services and on an ongoing basis.
5. The dispensary has implemented all policies and procedures related to personnel qualifications and training.

### **Examples:**

- *Job descriptions specify required qualifications, previous training, skills, experience, education, knowledge, licenses and certifications where applicable.*
- *The dispensary assesses competencies of personnel on a yearly basis.*
- *Criminal record checks are required for employment.*
- *The dispensary verifies credentials from primary source or references.*
- *The dispensary provides information resources and training for specialized duties.*
- *The dispensary has a formalized personnel training program and accompanying documentation.*
- *The dispensary maintains an education fund for personnel to attend relevant 3<sup>rd</sup> party training sessions, seminars, or conferences.*
- *The dispensary provides or funds in-house or external special skills training opportunities for personnel.*
- *The dispensary provides basic first-aid training for front line personnel.*
- *The dispensary organizes workshops on the diverse experiences of the local community, including culture, age, gender, sexual orientation, spiritual beliefs, socioeconomic status, languages and others.*
- *The dispensary has access to a medical advisor*
- *The dispensary utilizes a case management model*

## **b. Employment practices**

### **Background**

It is important for dispensaries to have fair employment practices. Formalizing hiring processes, employee reviews and evaluations supports the creation of a transparent and fair employment environment. Implementing clearly-defined personnel grievance and appeal processes can increase the effectiveness of an organization, as well as overall job satisfaction of personnel.

### **Standard**

The dispensary has transparent employment practices that conform to applicable laws and regulations.

### **Tests for compliance**

1. The dispensary has documented policies and procedures for transparent employment practices.
2. The dispensary ensures policies and procedures are accessible and clearly communicated to personnel.
3. The dispensary demonstrates awareness of and adherence to applicable laws and regulations.

### **Examples**

- *Grievance policies include whistle-blower policies.*
- *Job descriptions are formalized and reviewed annually.*
- *The dispensary conducts annual evaluations of employee performance.*
- *Formal employment contracts outline personnel rights and responsibilities.*
- *The dispensary implements explicit non-discrimination policies.*
- *The dispensary has workplace harassment policies.*
- *The dispensary's hiring process is open to competition.*

## **c. Personnel support and engagement**

### **Background**

Personnel are the backbone of any dispensary. Work in the delivery of health services can be emotionally and physically challenging. Additionally, due to the current legal status of medical cannabis dispensaries, dispensary personnel operate in a grey area and may be undertaking legal risk in order to provide medical cannabis to those in need. The dispensary can help mitigate impacts of this work by supporting personnel, sharing information with them, and engaging them in decisions about their work place. These practices will help create a happier, more effective workplace.

### **Standard**

The dispensary seeks to support and engage personnel in ways that promote well-being and job satisfaction.

## Test for compliance

1. The dispensary demonstrates policies and procedures to obtain input from personnel on an ongoing basis.
2. The dispensary has documented policies and procedures for hearing and addressing personnel complaints.
3. The dispensary has documented policies and procedures to address work-related health and legal impacts.
4. The dispensary communicates policies and procedures to personnel prior to them beginning employment and as policies and procedures are amended, and ensures policies and procedures are available for review and clarification.
5. The dispensary implements policies and procedures for obtaining input from personnel, hearing and addressing personnel complaints, addressing work-related health and legal impacts and communicating them to personnel.

### Examples

- *The dispensary utilizes personnel satisfaction surveys.*
- *The dispensary provides anonymous personnel comment boxes.*
- *The dispensary provides healthcare plans for personnel.*
- *The dispensary maintains legal defense funds.*
- *The dispensary has regular (weekly or monthly) personnel meetings.*
- *The dispensary has a personnel representative on their Board of Directors or Advisory Board.*
- *The dispensary provides vicarious trauma training to personnel.*
- *The dispensary ensures that personnel are aware that there are legal risks they may be undertaking to distribute medical cannabis.*

## 5. Community Contributions and Relations

**Focus:** Contributing to the community and creating positive relationships.

### a. Community contribution

#### Background

The provision of medical cannabis to patients with terminal illnesses and/or chronic disabilities has historically been rooted in a community-based compassionate care service model. In such a model, decisions, policies and practices are patient-centered and community-minded. The dispensary provides a community for patients while at the same time being part of the local community and the larger community of medical cannabis dispensaries, medical cannabis patients, health care services and other relevant stakeholders. Dispensaries are in a position to further the acceptance of both patients who benefit from medical cannabis and the dispensaries who serve them by remaining cognizant of opportunities to contribute to the well-being of their community beyond the dispensing of cannabis. This is particularly appropriate in the currently legal and



regulatory frameworks for cannabis and medical cannabis where motivations of dispensaries may come under scrutiny in the courts of justice and public opinion.

### **Standard**

The dispensary contributes to the community beyond the provision of cannabis.

### **Tests for Compliance**

1. The dispensary has policies and procedures for contributing to the community.
2. The dispensary documents activities that contribute to the community.
3. The dispensary implements policies and procedures for contributing to their community and documenting contributions.

### **Examples**

- *The dispensary makes financial contributions to local charities and social service organizations.*
- *The dispensary engages in community-based research projects that have ethics approval*
- *Social services and community-building activities are provided by the dispensary, such as annual celebrations, movie nights, educational workshops and capacity-building events.*
- *Programs to subsidize the cost of medical cannabis are implemented for those with low incomes.*
- *The dispensary organizes clothing drives and free goods exchanges.*
- *The dispensary institutes a quadruple bottom-line decision-making process that weighs the social, environmental, cultural and financial impacts of decisions, policies and practices.*

## **b. Community and Stakeholder Relations**

### **Background**

Dispensaries play an important role in the delivery of healthcare services in their community. Given the challenges of stigma and social acceptance present during the transition of medical cannabis from illicit to licit status, dispensaries have an added onus to establish a positive presence and good relations with the community and stakeholders. Maintaining open and respectful lines of communication with neighbours and relevant social service and community organizations can be an effective way to identify and respond to potential concerns. The image of the dispensary, portrayed through its physical appearance and its actions, affects the community and stakeholders' perceptions of the individual dispensary and other dispensaries across Canada.

### **Standard**

The dispensary maintains a positive presence and good relations with community and stakeholders.

## Tests for Compliance

1. The dispensary has documented policies and procedures for maintaining a clean and safe storefront.
2. The dispensary has documented policies and procedures that encourage positive communications with neighbours and other community stakeholders.
3. The dispensary has documented policies and procedures to obtain input from the community and other stakeholders.
4. The dispensary implements policies and procedures for maintaining a clean and safe storefront, encouraging positive communications and obtaining input.

## Examples

- *Dispensary personnel introduce themselves to neighbours and provide contact information.*
- *The dispensary maintains a well-lit storefront.*
- *The dispensary participates in and organizes community events*
- *The dispensary arranges formal meetings with local stakeholders (e.g. police, condition-based organizations, municipality)*
- *The dispensary joins local Business Improvement Associations (BIA) and Chambers of Commerce.*
- *The dispensary joins or forms their neighbourhood association.*
- *The dispensary informs and educates patients on expectations of conduct in the immediate neighbourhood and vicinity.*
- *The dispensary utilizes appropriate language and images on storefront*
- *The dispensary uses advertising to create awareness for those in need of services rather than to promote use of cannabis.*

## Appendix A

# Age of Majority

As indicated below, the legal age of majority varies in Canada depending on province or territory:

Provinces where the age of majority is 18:

- Alberta
- Manitoba
- Ontario
- Prince Edward Island
- Quebec
- Saskatchewan

Provinces and territories where the age of majority is 19:

- British Columbia
- New Brunswick
- Newfoundland and Labrador
- Northwest Territories
- Nova Scotia
- Nunavut
- Yukon

## Appendix B

# Healthcare Practitioner Prescribing Rights by Province

Alberta			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of Alberta	<a href="http://www.cspa.ab.ca">www.cspa.ab.ca</a>
Nurse Practitioners	RN, NP	College and Association of Registered Nurses of Alberta	<a href="http://www.nurses.ab.ca">www.nurses.ab.ca</a>
Pharmacists*			

British Columbia			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of British Columbia	<a href="http://www.cpsbc.ca">www.cpsbc.ca</a>
Nurse Practitioners	RN, NP	College of Registered Nurses of British Columbia	<a href="http://www.crnbc.ca">www.crnbc.ca</a>
Midwives*	RM	College of Midwives of British Columbia	<a href="http://www.cmbc.ca">www.cmbc.ca</a>
Naturopath	ND	British Columbia Naturopathic Association	<a href="http://www.bcna.ca">www.bcna.ca</a>
Doctor of Traditional Chinese Medicine	DTCM	College of Traditional Chinese Medicine and Practitioners and Acupuncturists of British Columbia	<a href="http://www.ctcm.bc.ca">www.ctcm.bc.ca</a>
Pharmacists*		College of Registered Nurses of British Columbia (CRNBC)	<a href="http://www.bcpharmacists.org">www.bcpharmacists.org</a>
Dentists*		College of Dental Surgeons of BC	<a href="http://www.cdsbc.org">www.cdsbc.org</a>

Manitoba			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of Ontario	<a href="http://www.cpsm.mb.ca">www.cpsm.mb.ca</a>
Nurse Practitioners	RN, NP	College of Registered Nurses of Manitoba	<a href="http://www.midwives.mb.ca">www.midwives.mb.ca</a>
Midwives**	RM	College of Midwives of Manitoba	<a href="http://www.midwives.mb.ca">www.midwives.mb.ca</a>
Pharmacists*		Manitoba Pharmaceutical Association	<a href="http://www.mpha.ca">www.mpha.ca</a>

New Brunswick			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of New Brunswick	<a href="http://www.cpsnl.ca">www.cpsnl.ca</a>
Nurse Practitioners	RN	Nurses Association of New Brunswick	<a href="http://www.nanb.nb.ca">www.nanb.nb.ca</a>
Pharmacists*		New Brunswick Pharmacists Association	<a href="http://www.nbpharma.ca">www.nbpharma.ca</a>

Newfoundland			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of Newfoundland and Labrador	<a href="http://www.cpsnl.ca">www.cpsnl.ca</a>
Nurse Practitioners	RN	Association of Registered Nurses of Newfoundland and Labrador	<a href="http://www.arnnl.ca">www.arnnl.ca</a>

Northwest Territories			
Who can Prescribe?	Letters	College	Website
Physicians	CCFP	Royal College of Physicians and Surgeons of Canada	<a href="http://www.nwtma.ca">www.nwtma.ca</a>
Specialist	MD	Royal College of Physicians and Surgeons of Canada	<a href="http://www.royalcollege.ca">www.royalcollege.ca</a>
Pharmacists * (Renew Only)			

Nova Scotia			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of Nova Scotia	<a href="http://www.cpnns.ns.ca">www.cpnns.ns.ca</a>
Nurse Practitioners	RN	College of Registered Nurses of Nova Scotia	<a href="http://www.crnns.ca">www.crnns.ca</a>
Midwives**		Midwifery Regulatory Council of Nova Scotia	<a href="http://www.mrcns.ca">www.mrcns.ca</a>
Pharmacists*		Pharmacist Association of Nova Scotia	<a href="http://www.pans.ns.ca">www.pans.ns.ca</a>

Nunavut			
Who can Prescribe?	Letters	College	Website
Physicians	CCFP	Royal College of Physicians and Surgeons of Canada	<a href="http://www.royalcollege.ca">www.royalcollege.ca</a>
Specialists	MD	Royal College of Physicians and Surgeons of Canada	<a href="http://www.royalcollege.ca">www.royalcollege.ca</a>
Pharmacists * (Renew Only)			

Ontario			
Who can Prescribe?	Letters	College	Website
Physicians	CCFP	College of Physicians and Surgeons of Ontario	<a href="http://www.cpsso.on.ca">www.cpsso.on.ca</a>
Specialist	MD	College of Physicians and Surgeons of Ontario	<a href="http://www.cpsso.on.ca">www.cpsso.on.ca</a>
Naturopath	ND	Canadian College of Naturopathic Medicine	<a href="http://www.ccnm.edu">www.ccnm.edu</a>
Pharmacists * (Renew Only)			

Prince Edward Island			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons PEI	<a href="http://www.cpspei.ca">www.cpspei.ca</a>
Nurse Practitioners	RN	Association of Registered Nurses PEI	<a href="http://www.arnpei.ca">www.arnpei.ca</a>
Pharmacists * (Renew Only)			

Quebec			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College des Medecins du Quebec	<a href="http://www.cmq.org">www.cmq.org</a>

Saskatchewan			
Who can Prescribe?	Letters	College	Website
Physicians	MD	College of Physicians and Surgeons of Saskatchewan	<a href="http://www.quadrant.net/cps">www.quadrant.net/cps</a>
Nurse Practitioners	RN,RP	Saskatchewan Registered Nurses Association	<a href="http://www.snra.org">www.snra.org</a>
Midwives**	RM	Saskatchewan College of Midwives	<a href="http://www.saskmidwives.ca">www.saskmidwives.ca</a>
Pharmacists*		Saskatchewan College of Pharmacists	<a href="http://saskpharm.ca">saskpharm.ca</a>

Yukon			
Who can Prescribe?	Letters	College	Website
Physicians	CCFP	Royal College of Physicians and Surgeons of Canada	<a href="http://www.royalcollege.ca">www.royalcollege.ca</a>
Specialist	MD	Royal College of Physicians and Surgeons of Canada	<a href="http://www.royalcollege.ca">www.royalcollege.ca</a>
Pharmacists * (Renew Only)			

\* Pharmacists will not be included in CAMCD standards as having signing authority.

\*\*The diagnosis and relating symptoms documented by the healthcare practitioner must fall within the purview of their respective education, professional designation and healthcare context.



## Appendix C

# Required Organizational Practices

The following CAMCD Dispensary Certification Standards are designated as Required Organizational Practices (ROP's) and are mandatory for both Trade Association and Certified members. The 18 ROP's are listed here, along with the Standard number for ease of reference. Please see the CAMCD Certification Standards for more information on the background of the standard, and examples of how the standard can be met.

(1)

Standard	The dispensary...
<b>I.1</b>	accepts patients who have reached the age of majority in their province or territory and minors who have written consent from a parent or legal guardian.

(2)

Standard	The dispensary...
<b>I.2.a</b>	requires the patient to present a documentation demonstrating a diagnosis and related symptom/s for which cannabis has well-documented potential medical applications, and an additional recommendation for cannabis use other conditions and related symptoms.

(3)

Standard	The dispensary...
<b>I.2.b</b>	supports patients that face barriers to access due to their medical condition or symptoms to obtain necessary confirmation of diagnosis and recommendation for use.

(4)

Standard	The dispensary...
<b>I.3.a</b>	obtains documentation of the patient's medical condition and related symptom(s), and recommendations for use from an eligible health care provider.

(5)

Standard	The dispensary...
<b>I.3.d</b>	verifies the authenticity of all application documentation.

(6)

Standard	The dispensary...
<b>II. 2.a</b>	obtains information required to effectively provide services and verify patient identity.

(7)

Standard	The dispensary...
<b>IV. 1.b</b>	verifies the identity of the patient prior to providing services.

(8)

Standard	The dispensary...
<b>IV. 3.a</b>	ensures that cannabis and cannabis products are dispensed in a clean environment.

(9)

Standard	The dispensary...
<b>IV. 3.b</b>	ensures cannabis and cannabis products are handled in a sanitary and careful manner when dispensed.

(10)

Standard	The dispensary...
<b>V. 1.a</b>	engages in strict quality control measures to assess quality and identify problems regarding raw cannabis and other cannabis products it dispenses.

(11)

Standard	The dispensary...
<b>VI. 1.a</b>	abides by universal precautions for infection control.

(12)

Standard	The dispensary...
<b>VI. 1.b</b>	is prepared to respond to health, security, fire, natural disasters and other emergencies.

(13)

Standard	The dispensary...
<b>VI. 1.e</b>	complies with all applicable municipal, provincial/territorial, and federal health and safety requirements.

(14)

Standard	The dispensary...
<b>VI. 2.a</b>	is prepared to respond to incidents that have the potential to affect the health and safety of patients, personnel, and the community.

(15)

Standard	The dispensary...
<b>VI. 3.a</b>	ensures adequate security measures for all dispensing locations and production facilities.

(16)

Standard	The dispensary...
<b>VI. 3.b</b>	keeps strict control over information that could affect the safety and security of patients, personnel, the dispensary and the community.

(17)

Standard	The dispensary...
<b>VI. 3.c</b>	keeps all patient information confidential and secure.

(18)

Standard	The dispensary...
<b>VII. 2.a</b>	is in compliance with all applicable municipal, provincial/territorial, and federal laws and regulations.

## Appendix D

# Tests for Compliance

### PART I

#### I.1

1. (1) The dispensary has documented policies and procedures to verify the age of patients.
2. (2) The dispensary has documented policies and procedures to obtain parent or legal guardian consent for applicants under the age of majority in their respective provinces.
3. (3) Dispensary personnel verify the age of patients and obtain parent or legal guardian consent if applicable before registering a patient.

#### I.2.a

1. (4) The dispensary has documented policies and procedures regarding requirements for diagnosis and/or recommendation for use.
2. (5) Dispensary personnel ensure each patient has a documented diagnosis or recommendation for use before they are registered.

#### I.2.b

1. (6) The dispensary has documented policies and procedures to support patients that face barriers to access due to their medical condition or symptoms to obtain necessary diagnosis and recommendation for use.
2. (7) Dispensary personnel implement the policies and procedures to support patients that face barriers to access due to their medical condition or symptoms to obtain necessary diagnosis and recommendation for use.

#### I.3.a

1. (8) The dispensary has a documented policy reflecting eligible healthcare practitioners.
2. (9) The dispensary only accepts documentation from eligible health care practitioners as a condition of registering a patient.
3. (10) Dispensary personnel implement policies and procedures for eligible health care practitioners.

#### I.3.b

1. (11) The dispensary has documented policies and procedures in place to collect necessary information for verifying patient eligibility as part of the application process.
2. (12) Dispensary personnel ensure that the necessary information has been obtained before registering a patient.

#### I.3.c.i

1. (13) The dispensary has documented policies and procedures outlining the

acceptable date for diagnoses and/or recommendations by health care practitioners from new applicants.

2. (14) Dispensary personnel implement the policies and procedures regarding acceptable dates for date for diagnoses and/or recommendations by health care practitioners from new applicants.

### **I.3.c.ii**

1. (15) The dispensary has documented policies and procedures regarding the updating of patient diagnoses and/or recommendations by health care practitioners.
2. (16) Dispensary personnel implement the policies and procedures regarding r updating diagnoses and/or recommendations by health care practitioners.

### **I.3.d**

1. (17) The dispensary has documented policies and procedures to verify the date and content of application documentation.
2. (18) The dispensary has documented policies and procedures to ensure that the health care practitioner is currently licensed.
3. (19) Dispensary personnel verify the date and content of application documentation and the validity of health care provider's license before registering the patient.

### **I.3.e**

1. (20) The dispensary has documented policies and procedures for acceptable types of documentation for obtaining necessary information about a patient and their health care practitioner.
2. (21) The dispensary has documented policies and procedures for informing patients of acceptable types of documentation.
3. (22) Dispensary personnel implement policies and procedures for acceptable types of documentation and informing patients.

### **I.4**

1. (23) The dispensary has documented policies and procedures for notifying the patient and their health care practitioner within two weeks of determination of ineligibility.
2. (24) Dispensary personnel implement the policies and procedures for notifying the patients and the health care practitioner of ineligible applications within two weeks of determination of ineligibility.

## **PART II**

### **II.1.a**

1. (25) The dispensary has documented policies and procedures for processing applications.
2. (26) The dispensary has documented policies and procedures to inform patients of the status of their application upon their request.
3. (27) Dispensary personnel implement the policies and procedures for processing applications.

### **II.1.b**

1. (28) The dispensary has documented policies and procedures to identify and

- prioritize timely access to patients at the critical and terminal stages of illness.
2. (29) Dispensary personnel implement the policies and procedures to identify and prioritize timely access to patients at the critical and terminal stages of illness.

### II.2.a

1. (30) The dispensary has documented policies and procedures regarding the collection of patient information.
2. (31) The dispensary has documented policies and procedures regarding verification of patient identity.
3. (32) Dispensary personnel collect patient information and verify patient identity as per policies and procedure.

### II.2.b

1. (33) The dispensary has documented the rights and responsibilities of patients, including repercussions for infractions, courses of appeal and process for complaints.
2. (34) The dispensary has a documented policy and procedure to ensure patients are aware of their rights and responsibilities, including repercussions for infractions, courses of appeal and process for complaints as part of their registration.
3. (35) Dispensary personnel implement the documented policy and procedure to ensure patients are aware of their rights and responsibilities including repercussions for infractions, courses of appeal and process for complaints.

### II.2.c

1. (36) The dispensary has documented policies and procedures to obtain the patient's consent designating the dispensary as their agent to procure cannabis on their behalf.
2. (37) The dispensary has documented policies and procedures to obtain the patient's consent accepting the legal risk in acquiring from the dispensary
3. (38) The dispensary has documented policies and procedures to obtain the patient's consent confirming that the cannabis obtained from the dispensary is for their personal medical use only.
4. (39) Dispensary personnel obtain consent as per documented policies and procedures.

### II.2.d

1. (40) The dispensary has documented policies and procedures for dispensary personnel to identify that the patient is registered.
2. (41) The dispensary has documented policies and procedures for patients to identify to third parties that a patient is registered and in good standing with the dispensary.
3. (42) Dispensary personnel implement the documented policies and procedures of ensuring patients can be identified as being registered and in good standing with the dispensary.

### II.3.a

1. (43) The dispensary has documented policies and procedures for providing patient education.

2. (44) The education content includes up to date information about plant quality and strains; ingestion options; side-effects, dosage and potency; legal considerations.
3. (45) Dispensary personnel implement the patient education policies and procedures.

### **II.3.b**

1. (46) The dispensary has documented policies and procedures to develop individual plans based on individual patient needs.
2. (47) The dispensary has documented policies and procedures to develop monitoring protocols for patients with special consideration that require specific support.
3. (48) The dispensary has documented policies and procedures to advise the patient to contact the dispensary and their health care practitioner if there is a worsening of symptoms or adverse effects.
4. (49) Dispensary personnel implement policies and procedures to develop individual plans and protocols for specific support and monitoring.

## **PART III**

### **III.1.a**

1. (50) The dispensary has documented hours of operation.
2. (51) The dispensary has documented policies and procedures to inform patients of hours of operation.
3. (52) Dispensary personnel implement documented hours of operation and policies and procedures to inform patients of hours of operation.

### **III.1.b**

1. (53) The dispensary determines a policy regarding the provision of access to visiting patients.
2. (54) Dispensaries that offer access to visiting patients have documented policies and procedures for verifying and allowing access to visiting patients.
3. (55) Dispensary personnel allow access to visiting patients as per dispensary policies and procedures.

### **III.1.c**

1. (56) The dispensary complies with applicable accessibility legislation.
2. (57) The dispensary has documented policies and procedures to ensure accessibility.
3. (58) Dispensary has documented policies and procedures for patients to communicate concerns regarding accessibility.
4. (59) The dispensary personnel implement policies and procedures to ensure accessibility and for patients to communicate concerns regarding accessibility.

### **III.2.a**

1. (60) The dispensary has documented policies and procedures to ensure that a variety of strains are consistently available.
2. (61) Dispensary personnel implement the policies and procedures to ensure a variety of strains are consistently available.



### III.2.b

1. (62) The dispensary has policies and procedures to ensure that a variety of cannabis products are consistently available.
2. (63) Dispensary personnel implement the policies and procedures to ensure that a variety of cannabis products are consistently available.

### III.2.c

1. (64) The dispensary has documented policies and procedures to ensure that patients have access to devices for the safe and effective administration of cannabis and cannabis products.
2. (65) Dispensary personnel implement the policies and procedures to ensure that patients have access to devices for the safe and effective administration of cannabis and cannabis products.

### III.2.d

1. (66) The dispensary has policies and procedures to ensure that all non-cannabis products sold are approved for sale in Canada and that the dispensary has the appropriate retail license.
2. (67) The dispensary has policies and procedures that prohibit the sale of alcohol, tobacco, or scheduled substances other than cannabis.
3. (68) Dispensary personnel implement documented policies and procedures for the sale of other products.

### III.3.a

1. (69) The dispensary has documented policies and procedures for providing information on strains and products to patients.
2. (70) Dispensary personnel provide information on strains and products to patients as per documented policies and procedures.

### III.3.b

1. (71) The dispensary has documented policies and procedures to track patient reports of efficacy and side effects with cannabis strains and products.
2. (72) The dispensary has documented policies and procedures to provide tools to patients to track efficacy and side effects of strains and products.
3. (73) Dispensary personnel implement the policies and procedures to track patient reports and provide tools to patients to track efficacy and side effects of strains and products.

### III.3.c

1. (74) The dispensary has documented policies and procedures for providing individualized patient consultations.
2. (75) Dispensary personnel implement policies and procedures for providing individualized patient consultations.

### III.3.d

1. (76) The dispensary has documented policies and procedures to identify, support and monitor patients  
for whom cannabis use poses potential risks.
2. (77) Dispensary personnel implement the policies and procedures to identify, support and monitor patients  
with a special considerations for which cannabis use poses potential risks.

## PART IV

### IV.1.a

1. (78) The dispensary has documented policies and procedures to support patients' access to ancillary health care services and community resources.
2. (79) Dispensary personnel support access to ancillary health care and community resources according to documented policies and procedures.

### IV.4.b

1. (80) The dispensary has documented policies and procedures for providing access to advocacy.
2. (81) The dispensary maintains a log of advocacy activities.
3. (82) Dispensary personnel implement the documented policies and procedures for providing access to advocacy.

### IV.1.a

1. (83) The dispensary has documented policies and procedures for each dispensing options offered.
2. (84) The dispensary has policies and procedures to confirm the receipt by patient of cannabis and cannabis products dispensed via caregiver pickup, home delivery and mail order.
3. (85) The dispensary has documented policies and procedures to protect the safety and security of patients and personnel when dispensing medical cannabis via home delivery and mail order.
4. (86) Dispensary personnel implement the dispensing options offered according to documented policies and procedures.

### IV.1.b

1. (87) The dispensary has documented policies and procedures for verifying a patient's identity for all dispensing options offered.
2. (88) Dispensary personnel verify patient's identity according to documented policies and procedures.

### IV.2.a

1. (89) The dispensary has documented policies and procedures regarding quantity restrictions.
2. (90) The dispensary has a documented formula to determine the equivalency of cannabis products to dry weight.
3. The dispensary personnel limit individual client purchase according to policies and procedures regarding quantity restrictions.

### IV.2.b

1. (91) The dispensary has documented policies and procedures regarding circumstances in which it will refuse service to a registered patient.
2. (92) The dispensary has documented policies and procedures for informing patients of refusal of services including reason for refusal of service and the duration.
3. (93) Dispensary personnel implement policies and procedures circumstances in which it will refuse service to registered patients service to a registered patient and for informing patients of refusal of services.
4. (94) Dispensary personnel document all instances of refusing services to registered patients, as well as the rationale for doing so.

IV.3.a

1. (95) The dispensary has documented policies and procedures to ensure that medicine is dispensed in compliance with relevant food handling regulations.
2. (96) Dispensary personnel implement policies and procedures that ensure medicine is dispensed in a clean environment.

IV.3.b

1. (97) The dispensary has documented policies and procedures regarding the handling of cannabis and cannabis products.
2. (98) The dispensary personnel handle the cannabis and cannabis products according to policies and procedures.

IV.4.a

1. (99) The dispensary has documented policies and procedures for maintaining the accuracy of scales
2. (100) The dispensary has documented policies and procedures for accurate and consistent measurement practices.
3. (101) The dispensary personnel maintain accuracy of scales and employ measurement practices according to established policies and procedures.

IV.4.b

1. (102) The dispensary has documented policies and procedures for labeling of cannabis and cannabis products.
2. (103) The dispensary personnel label the cannabis and cannabis products according to established policies and procedures.

IV.4.c

1. (104) The dispensary has documented policies and procedures for the packaging of cannabis and cannabis products.
2. (105) Dispensary personnel package cannabis and cannabis products according to established policies and procedures.

IV.4.d

1. (106) The dispensary has documented policies and procedures to collect and store sales records.
2. (107) Dispensary personnel collect and store records of sales according to established policies and procedures.

V.1.a

1. (108) The dispensary has documented policies and procedures for quality control of cannabis and cannabis products.
2. (109) The dispensary has policies and procedures for documenting and responding to any reported adverse effects.
3. (110) Dispensary personnel implement policies and procedures for quality control and for documenting and responding to any reported adverse effects.

V.1.b

1. (111) The dispensary has documented requirements for the production of cannabis and cannabis products.
2. (112) The dispensary has documented policies and procedures to review and approve production methods used by all producers of cannabis and cannabis products.
3. (113) Dispensary personnel implement policies and procedures to review

and approve production methods and ensure production requirements are adhered to.

V.1.c

1. (114) The dispensary has documented policies and procedures regarding storage and packaging of cannabis and cannabis products.
2. (115) Dispensary personnel store and package the cannabis and cannabis products according to the storage and packaging policies and procedures.

V.2.a

1. (116) The dispensary has policies and procedures to ensure there is a sufficient variety and quantity of cannabis and cannabis products.
2. (117) Dispensary personnel implement policies and procedures for ensuring sufficient variety and quantity of cannabis and cannabis products.

V.2.b

1. (118) The dispensary has policies and procedures to track cannabis and cannabis products at each stage of transfer.
2. (119) Dispensary personnel implement policies and procedures to track cannabis and cannabis products at each stage of transfer.

V.3.a

1. (120) The dispensary has documented policies and procedures stipulating that they will supply cannabis and cannabis products exclusively to CAMCD-certified dispensaries or other eligible recipients.
2. (121) The dispensary has documented policies and procedures stipulating that contracted suppliers will exclusively supply CAMCD-certified dispensaries or other eligible recipients.
3. (122) Dispensary personnel implement policies and procedures stipulating that the dispensary and contracted suppliers exclusively supply CAMCD-certified dispensaries or other eligible recipients.

V.3.b

1. (123) The dispensary has documented policies and procedures for entering into contracts with suppliers from whom they acquire cannabis and/or cannabis products.
2. (124) Contracts stipulate quantity, quality and safety standards, and reporting and exclusivity requirements.
3. (125) Dispensary personnel ensure that policies and procedures for entering into contracts with suppliers are implemented.

V.3.c

1. (126) The dispensary has documented policies and procedures for supplier reporting requirements.
2. (127) Dispensary personnel ensure that reporting requirements for suppliers are implemented.

VI.1.a

1. (128) The dispensary has documented policies and procedures for adhering to universal precautions for infection control.
2. (129) Dispensary personnel implement documented policies and procedures for adhering to universal precautions for infection control.

VI.1.b

1. (130) The dispensary has documented policies and procedures for

responding to health, security, fire, natural disasters and other emergencies.

2. (131) Dispensary personnel implement documented policies and procedures for responding to health, security, fire, natural disasters and other emergencies.

#### VI.1.c

1. (132) The dispensary provides clean restroom facilities for patients and personnel on-site or provides clear notice of location of public washrooms in close proximity.
2. (133) The dispensary ensures all patients and staff are aware of the location of restrooms that are available to them.

#### VI.1.d

1. (134) The dispensary has documented policies and procedures regarding on-site medication use for addressing individual, dispensary and community health and safety.
2. (135) Dispensary personnel implement policies and procedures for addressing individual, dispensary and community health and safety.

#### VI.1.e

1. (136) The dispensary has documented all applicable municipal, provincial/territorial and federal health and safety requirements.
2. (137) The dispensary has documented policies and procedures for adhering to all applicable municipal, provincial /territorial, and federal health and safety requirements.
3. (138) Dispensary personnel ensure that documented policies and procedures for adhering to all applicable municipal, provincial/territorial and federal, health and safety requirements are implemented.

#### VI.2.a

1. (139) The dispensary has documented policies and procedures for incident management.
2. (140) Dispensary personnel implement documented policies and procedures for incident management.

#### VI.2.b

1. (141) The dispensary has documented policies and procedures for providing consequences for infractions
2. (142) The dispensary has documented policies and procedures for informing patients of the process to appeal consequences.
3. (143) Dispensary personnel implement policies and procedures for providing consequences for infractions and informing patients of the process to appeal them.

#### VI.3.a

1. (144) The dispensary has established and documented appropriate security-related policies, procedures, and infrastructure at all dispensing and production-related locations.
2. (145) The dispensary has documented policies and procedures for informing patients, personnel and the community of any security measures (e.g. surveillance) that may impact personal privacy.
3. (146) Dispensary personnel ensure security-related policies and procedures are implemented and regularly monitored.

#### VI.3.b

1. (147) The dispensary has documented policies and procedures regarding the management of sensitive information.
2. (148) Dispensary personnel implement documented policies and procedures regarding the management of sensitive information.

#### VI.3.c

1. (149) The dispensary has documented policies and procedures to protect the privacy and confidentiality of patients in accordance with all relevant privacy regulations.
2. (150) The dispensary has documented policies and procedures to communicate privacy and confidentiality policies and procedures to patients.
3. (151) Dispensary personnel implement policies and procedures to protect the privacy and confidentiality of patients and communicate with patients about these measures.

#### VII.1.a

1. (152) The dispensary has a documented governance structure including roles, responsibilities and decision-making process.
2. (153) The dispensary operates according to the documented governance structure.

#### VII.1.b

1. (154) The dispensary has documented policies and procedures regarding safeguarding records.
2. (155) The dispensary implements policies and procedures regarding safeguarding records.

#### VII.1.c

1. (156) The dispensary prepares budgets prior to the fiscal year that include projections of revenues and expenditures.
2. (157) The dispensary disseminates budgets to and receives approval from appropriate personnel.
3. (158) The dispensary establishes fiscal policies and procedures, including control practices.
4. (159) The dispensary implements fiscal policies and procedures.

#### VII.1.d

1. (160) The dispensary has a documented risk management plan.
2. (161) The dispensary annually reviews its risks and adjusts its risk management plan accordingly.
3. (162) The dispensary implements its risk management plan.

#### VII.1.e

1. (163) The dispensary establishes performance indicators that are observable, measurable and achievable.
2. (164) The dispensary collects data and assesses progress in regards to performance indicators on an ongoing basis.

#### VII.2.a

1. (165) The dispensary demonstrates knowledge of applicable laws and regulations.
2. (166) The dispensary has documented policies and procedures that comply with applicable laws and

- regulations.
3. (167) Dispensary personnel implement policies and procedures that comply with applicable laws and regulations.

#### VII.2.b

1. (168) The dispensary has evidence of remitting taxes to the relevant revenue agencies.

#### VII.3.a

1. (169) The dispensary has documented policies and procedures for communicating rights to patients.
2. (170) The dispensary has documented policies and procedures for ensuring rights are available for review and clarification.
3. (171) Dispensary personnel implement policies and procedures for communicating rights to patients and ensuring rights are available for review and clarification.

#### VII.3.b

1. (172) The dispensary has documented policies and procedures for seeking input from patients on an ongoing basis.
2. (173) The dispensary has documented policies and procedures for analyzing and responding to input from patients.
3. (174) Dispensary personnel implement policies and procedures for seeking, analyzing and responding to input from patients.

#### VII.3.c

1. (175) The dispensary has documented policies and procedures to review and address patient complaints.
2. (176) Dispensary personnel communicate the process for complaints to patients.
3. (177) The dispensary has a physical location where patients can communicate directly with dispensary personnel and ensures this location and its hours are known to patients.

#### VII.4.a

1. (178) The dispensary has documented policies and procedures for necessary skills and competencies required by personnel according to their role.
2. (179) The dispensary has documented policies and procedures to verify the background and credentials of personnel prior to employment and thereafter as necessary.
3. (180) The dispensary has documented policies and procedures to evaluate the competency of personnel.
4. (181) The dispensary has documented policies and procedures to ensure personnel are adequately oriented and trained, both prior to providing services and on an ongoing basis.
5. (182) The dispensary has implemented all policies and procedures related to personnel qualifications and training.

#### VII.4.b

1. (183) The dispensary has documented policies and procedures for transparent employment practices.
2. (184) The dispensary ensures policies and procedures are accessible and clearly communicated to personnel.
3. (185) The dispensary demonstrates awareness of and adherence to applicable

laws and regulations.

VII.4.c

1. (186) The dispensary demonstrates policies and procedures to obtain input from personnel on an ongoing basis.
2. (187) The dispensary has documented policies and procedures for hearing and addressing personnel complaints.
3. (188) The dispensary has documented policies and procedures to address work-related health and legal impacts.
4. (189) The dispensary communicates policies and procedures to personnel prior to them beginning employment and as policies and procedures are amended, and ensures policies and procedures are available for review and clarification.
5. (190) The dispensary implements policies and procedures for obtaining input from personnel, hearing and addressing personnel complaints, addressing work-related health and legal impacts and communicating them to personnel.

VII.5.a

1. (191) The dispensary has policies and procedures for contributing to the community.
2. (192) The dispensary documents activities that contribute to the community.
3. (193) The dispensary implements policies and procedures for contributing to their community and documenting contributions.

VII.5.b

1. (194) The dispensary has documented policies and procedures for maintaining a clean and safe storefront.
2. (195) The dispensary has documented policies and procedures that encourage positive communications with neighbours and other community stakeholders.
3. (196) The dispensary has documented policies and procedures to obtain input from the community and other stakeholders.
4. (197) The dispensary implements policies and procedures for maintaining a clean and safe storefront, encouraging positive communications and obtaining input.