

Curriculum Section	Subsection	Subsection Part	Script
Introduction			Hello and welcome to Utah Cannabis Agent Training! I'm glad you're here; together we'll cover the basics about practicing as a medical cannabis pharmacy agent and a medical cannabis courier agent.
Section 1 Administration			This first section of the course will cover aspects of government organizations and legislation; creating a structure that protects the health and safety of the general public while making sure medicine is accessible to qualifying patients.
	1.1 Government Departments		There are two State of Utah Departments that regulate the medical cannabis program. Working together, these organizations are focused on providing the industry with the greatest level of success.
		1.1.1 Utah Department of Health and Human Services	The Department of Health and Human Services (DHHS) is tasked with regulating the Medical Cannabis Pharmacies and Couriers, Medical Provider registration, cannabis pharmacy agent/courier agent registration, and patient applications and registrations. The department monitors a software called the Electronic Verification System (EVS), allowing all of these activities to be administered in a single location.
		1.1.2 Utah Department of Agriculture and Food	The Utah Department of Agriculture and Food (UDAF) oversees the production elements of Utah's medical cannabis program, including Cultivators, Processors, and analytical testing labs. UDAF also regulates the applications and registration of all cannabis production establishment agents working at these facilities.
	1.2 Regulatory Boards		There are several boards, or groups of assigned individuals, that provide independent insight and authorize aspects of legislation and acceptable elements of the medical cannabis program.
		1.2.1 Compassionate Use Board	The CUB reviews all medical cannabis card applications for individuals under age 21, and for adults who do not have a qualifying condition but do have a recommending medical provider who supports their approval for a medical cannabis card.
		1.2.2 Cannabis Research Review Board	The Cannabis Research Review Board collects necessary data and research to make recommendations for legislators. These legislators then make decisions on regulations for allowed product types, concentrations, and routes of transmission.
		1.2.3 Cannabis Production Licensing Board	The Cannabis Production Licensing Board is a part of the Utah Department of Agriculture and Food (UDAF). This board is responsible for determining the eligibility of license holder applications, registrations, and renewals.
		1.2.4 Medical Cannabis Advisory Board	

	<p>1.3 Violations</p>		<p>In the state of Utah, it's illegal for a medical cannabis cardholder to sell or give any cannabis or cannabis products to another card holder. This includes cannabis and cannabis products in medicinal dosage forms, medical cannabis devices, and cannabis residue from these devices. If a medical cannabis card holder violates this law, they will be considered guilty of a class B misdemeanor and may be subject to a fine of \$1,000. However, designated caregivers and medical cannabis guardian cardholders who give products to relevant provisional patient cardholders are exempt from this law. Additionally, individuals who may be guilty of violating this law are not considered to be in violation of the Utah Controlled Substances Act. The Utah Department of Health possesses the authority to revoke or refuse licenses for medical cannabis pharmacies and couriers, as well as to impose administrative penalties for violations of the Act. The department must follow protocol before revoking a license, including providing the opportunity for a hearing. If an individual fails to comply with a citation issued by the department, their license or agent registration card may be refused, suspended, revoked, or placed on probation. The Act also specifies that individuals who violate certain provisions of the Act may be found guilty of an infraction and subject to a fine of \$100 but are not guilty of violating the Utah Controlled Substances Act.</p>
<p>Section 2 Licenses and Personnel</p>			<p>This section covers the various types of business licenses throughout the medical cannabis program, and the personnel responsible for the operation of the associated entities. We will also cover the required prerequisites and registration process for medical professionals and cannabis agents.</p>
	<p>2.1 Recommending medical Providers</p>		<p>A Recommending Medical Provider may take one of two pathways in order to recommend medical cannabis to qualifying patients: the Limited Medical Provider (LMP) program or the Qualified Medical Provider (QMP) program. Both pathways require that the provider is a Utah-licensed MD, DO, APRN, PA, or DPM with a controlled-substance license.</p>
		<p>2.1.1 Qualified Medical Provider (QMP)</p>	<p>QMPs (Qualified Medical Providers) are the primary healthcare professionals with the ability to recommend medical cannabis to a patient with a qualifying medical condition. A QMP's recommendation is also required for a patient appealing the Compassionate Use Board. The QMP must authorize a patient's use of medical cannabis through the State Electronic Verification System.</p>
		<p>2.1.2 Limited Medical Provider (LMP)</p>	<p>LMPs don't have the requirement to register with the DHHS Center for Medical Cannabis or complete continuing-education requirements to recommend medical cannabis. The Limited Medical Providers are limited to 15 active medical cannabis recommendations at a time. Patients must meet the same qualifying conditions, and be at least 21 years of age. To recommend medical cannabis, an LMP submits a form provided by the Department and faxes or emails it to a licensed medical cannabis pharmacy. A PMP or pharmacy agent at the medical cannabis pharmacy must verify the validity of the recommendation and enter the completed form into the Electronic Verification System (EVS). The patient will then be able to complete their medical cannabis application.</p>
	<p>2.2 Registered Medical Cannabis Card-holders</p>		<p>Medical Cannabis Cardholders are individuals allowed to purchase cannabis and cannabis products from a licensed Medical Cannabis Pharmacy, intended for Patient use. There are three categories of cardholders that must be registered in the Electronic Verification System; Patients, Guardians, and Caregivers.</p> <p>Medical cannabis patients must have a recommendation from an authorized Medical Provider. They are Allowed to purchase, transport, and consume medical cannabis. A patient may have as many as two (2) Caregivers through the Electronic Verification System, with a recommendation by their Qualified Medical Provider. Both Guardians and Caregivers may assist in the form of purchase or administration of medicine.</p>
		<p>2.2.1 Patient</p>	<p>Medical Cannabis Patients are required to have a recommendation from a Qualified Medical Provider and register within the Electronic Verification System. Medical Cannabis Patients are the only individuals in the state of Utah allowed to consume approved forms of medical cannabis purchased from a licensed medical cannabis pharmacy.</p>

		<p>2.2.2 Provisional Patient</p>	<p>Provisional patients are allowed to purchase and consume medical cannabis on a conditional basis. This is primarily to limit the amount of time a patient can access medical cannabis.</p> <p>A minor can be eligible for a provisional patient card if: the minor has a qualifying condition the minor's QMP recommends a medical cannabis treatment for a qualifying condition one of the minor's parents or legal guardians petitions the Compassionate Use Board under Section 26-61a-105, and the Compassionate Use Board recommends department approval of the petition or the minor's parent or legal guardian is eligible for a medical cannabis guardian card under Subsection (2)(b) or designates a caregiver under Subsection (2)(d) who is eligible for a medical cannabis caregiver card under Section 26-61a-202.</p>
		<p>2.2.3 Non-Resident Patient</p>	<p>Utah's medical cannabis program allows for reciprocity with other state medical cannabis programs. This means if an individual is a resident of another U.S. State that also allows medical cannabis, and that individual has a qualifying medical condition (as defined by the State of Utah), then that person can be issued a Non-Resident Patient card. This allows the patient to enter a medical cannabis pharmacy, purchase, transport, and consume medical cannabis while visiting the State of Utah (for a period of not longer than 30 days).</p> <p>The non-resident card is valid for 21 days, and two 21-day cards can be issued to an individual twice per year.</p>
		<p>2.2.4 Guardian</p>	<p>Along with a recommendation for use of medical cannabis, a medical provider must also provide the information of a parent or legal guardian for patients under the age of 18.</p>
		<p>2.2.5 Caregiver</p>	<p>A patient is allowed to have up to a maximum of two caregivers. Caregivers must undergo a background check and register within the Utah EVS.</p>
	<p>2.3 Medical Cannabis Pharmacy</p>		<p>A license is required to perform any actions related to the sale of medical cannabis. A medical cannabis pharmacy must be approved by the Department of Health and Human Services (DHHS). Currently, there are fifteen pharmacies in the State of Utah.</p>

		<p>2.3.1. Pharmacy Medical Provider (PMP)</p>	<p>There must be a registered Pharmacy Medical Provider on-site at a medical cannabis pharmacy at all times during business hours to provide consultation upon patient request. Additionally, each pharmacy has a Pharmacist-In-Charge. This individual is in charge of maintaining State and Federal compliance regulations regarding the storage and sale of medications, and the sensitive personal information associated with it.</p> <p>The ideal patient interaction at a medical cannabis pharmacy should be one that prioritizes the patient's needs and concerns. This includes providing accurate and up-to-date information about available products, including the different strains and methods of consumption or application that are available, as well as any potential side effects or interactions with other medications. The pharmacist should also take the time to understand the patient's qualifying condition and any prior experience with medical cannabis, and provide guidance on appropriate dosing and usage.</p> <p>In order to ensure that the patient is comfortable and informed, the pharmacist should also provide counseling and answer any questions the patient may have. This can include information on the legal and regulatory aspects of medical cannabis, as well as providing resources for additional information or support. The pharmacist should also be able to provide guidance on how to properly store and handle medical cannabis products, as well as provide information on the various devices that are available for consumption.</p> <p>It's also important for the pharmacist to ensure that the patient is aware of the proper disposal methods for any unused or expired product. The pharmacist should also follow-up with the patient to ensure that their experience with the product is positive and that the product is meeting their needs. Additionally, the pharmacist should ensure that the patient's privacy and confidential information is respected and protected.</p> <p>In summary, the ideal patient interaction at a medical cannabis pharmacy should be one that is informative, supportive, and respectful of the patient's needs, concerns and privacy. The pharmacist should be knowledgeable and able to provide accurate and up-to-date information, guidance on appropriate dosing and usage, counseling and follow-up care, and ensure the proper storage and disposal of the medical cannabis products.</p>
		<p>2.3.2. Medical Cannabis Pharmacy Agent</p>	<p>The Pharmacy Agent is any person with access to medical cannabis, or any person with the authority to direct pharmacy operations and daily management. A medical cannabis pharmacy agent can check a patient into the pharmacy, perform sales transactions, maintain inventory, and provide information about medical cannabis products, but not the effects of medication.</p>
	<p>2.4. Medical Cannabis Home Delivery</p>		<p>There are only two types of entities allowed to transport medical cannabis to complete a patient sales transaction: a Home Delivery Medical Cannabis Pharmacy, and a Courier Agent on behalf of home delivery pharmacy.</p> <p>A number of the medical cannabis pharmacy licenses are issued to deliver medical cannabis directly to a patient's home in addition to their brick and mortar pharmacy. This allows individuals with debilitating illness to conveniently access their medicine.</p> <p>Delivery of medical cannabis to a registered patient at their address listed in the EVS, can be completed in one of four ways:</p> <ol style="list-style-type: none"> 1) a Pharmacy Agent of a Home Delivery Medical Cannabis Pharmacy, 2) a Courier agent employed by a licensed medical cannabis courier service, 3) transportation and delivery performed by a registered caregiver or guardian, or 4) a patient transporting medical cannabis purchased at a licensed medical cannabis pharmacy.
		<p>2.4.1. Medical cannabis courier agent</p>	<p>A Courier Agent is a person employed by a medical cannabis courier company, allowed to perform a transportation of cannabis in order to complete a sales transaction with a registered patient.</p> <p>A courier must uphold all of the same privacy and operational standards as a regular Pharmacy Agent.</p>
<p>Section 3 Medical Cannabis Products</p>			<p>Medical cannabis products come in various forms, including flower, edibles, capsules, tinctures, and topicals. Utah's medical cannabis program has strict rules and regulations for the production, testing, labeling, and distribution of these products, to ensure that they are safe and effective for patients.</p>

	<p>3.1 Medical cannabis products</p>		<p>The Cannabis Research and Review Board (CRRB) is responsible for evaluating the efficacy of cannabis and cannabis-related products in the Utah market. The board collaborates with both the Department of Health and the Department of Agriculture and Food to review available research related to the human use of cannabinoid products. Specifically, the CRRB evaluates the safety and efficacy of cannabinoid products and expanded cannabinoid products in terms of: medical conditions that respond to cannabinoid products; dosage amounts and their medical forms; interactions between cannabinoid products, expanded cannabinoid products, and other treatments.</p> <p>The CRRB may only review research that has been approved by an Institutional Review Board, or approved/conducted by the federal government.</p>
		<p>3.1.1. Medical Dosage Form</p>	<p>Under Utah Medical Cannabis Law, products may only take the following forms: Tablets and Capsules Oils & Liquid Suspensions Topical preparations; such as creams and salves Sublingual oils Gelatin Cubes (Otherwise known as infused edibles) Raw cannabis flower Resin and Wax, or Aerosol form. *Medical cannabis CANNOT be smoked or ignited in any way. However, the use of a heating element in order to create a vapor is an approved method of consumption.</p>
		<p>3.1.2. Mandatory Testing</p>	<p>There are laws for mandatory testing of cannabis and its products at two points throughout the supply chain. The first point of mandatory testing happens when raw cannabis or derivative cannabis products move from Processing/extraction to packaging and labeling. Then, it is tested again, before it is transported from final packaging/labeling to a licensed Medical Cannabis Pharmacy. A Product batch which fails testing due to higher than acceptable amounts of analytes must be destroyed.</p>
	<p>3.2. Packaging and Labeling</p>		<p>This lesson will address the legally-required processor and pharmacy labeling standards. All packaging must be tamper evident and child proof, and include all lawfully required information to be eligible for sale to a patient. However, a medical cannabis pharmacy may sell medical cannabis to another medical cannabis pharmacy without a patient purchase label.</p>
		<p>3.2.1 Processor Packaging</p>	<p>All packaging for cannabis must be tamper evident & child proof, according to 16 CFR 1700.15 "Child resistant packaging"</p>
		<p>3.2.2 Mandatory Labeling</p>	<p>All labels must have text which is at least 8 point font, have no unauthorized information or pictures, and state all possible allergens. The product must clearly state that it contains cannabis, disclose the total amount of THC and other cannabinoids, the extraction method, and the unique ID number. Additionally, a cannabis product must not mimic a candy-like product, or be appealing to children in any way (subject to department interpretation). All gelatinous cubes must have an affixed warning label stating the risks of over consumption. A product that has been formulated with any amount of Derivative or Synthetic cannabinoids, must clearly state:</p> <p>"This product contains derivative or synthetic cannabinoids."</p> <p>Likewise, this warning label MUST appear, exactly as stated, on EVERY product which is readily available for purchase. It is mandatory, no exceptions, and reads</p> <p>"WARNING: Cannabis has intoxicating effects and may be addictive. Do not operate a vehicle or machinery under its influence. KEEP OUT OF REACH OF CHILDREN. This product is for medical use only. Use only as directed by a recommending medical provider."</p> <p>A medical cannabis pharmacy may not sell cannabis or a cannabis product without first indicating on the cannabis or cannabis product label the name of the medical cannabis pharmacy. Each medical cannabis pharmacy shall retain in the pharmacy's records the following information regarding each recommendation underlying a transaction: -the recommending medical provider's name, address, and telephone number; -the patient's name and address; -the date of issuance; -directions of use and dosing guidelines or an indication that the recommending medical provider did not recommend specific directions of use or dosing guidelines and; -if the patient did not complete the transaction, the name of the medical cannabis cardholder who completed the transaction (i.e guardian, caregiver)</p> <p>A medical cannabis pharmacy may not sell medical cannabis unless the medical cannabis has a label securely affixed to the container indicating necessary information which is to be visible.</p>

<p>Section 4 Federal and State Patient Privacy Law & HIPAA</p>			<p>This section of the course will cover aspects of medical cannabis pharmacies, couriers (delivery drivers), and most importantly, we will discuss federal privacy laws regarding patient health information.</p>
	<p>4.1. Federal Law</p>		<p>The Health Insurance Portability and Accountability Act, or HIPAA, is a federal law created to set standards protecting private health information. Medical cannabis pharmacy agents are subject to this rule and must guard the confidentiality of all sensitive identifiable data, including personally identifiable information (PII) and personal health information (PHI). It's important to note that HIPAA is in place to protect the privacy of individuals' health information. It's critical for covered entities (Pharmacies) and business associates (Cannabis Agents) to understand and follow HIPAA regulations to ensure that this information is kept secure.</p>
		<p>4.1.1. Understanding HIPAA</p>	<p>There are three main components to understanding HIPAA</p> <ul style="list-style-type: none"> -The Privacy Rule. -The Security Rule, and -The Breach Notification Rule <p>First, the Privacy Rule. This rule establishes national standards to protect individuals' medical records and other personal health information. It applies to health plans, healthcare clearinghouses, and healthcare providers. The HIPAA Privacy Rule requires covered entities to maintain the privacy of PHI, provide individuals with notice of their privacy rights, and give individuals a copy of the covered entity's notice of privacy practices. It also affords individuals the right to access and request a copy of their PHI, as well as the right to request amendments to their PHI.</p> <p>Next, we have the HIPAA Security Rule, which specifies technical and non-technical safeguards that covered entities and their business associates must implement to secure electronic protected health information, or ePHI. Covered entities and business associates are required to protect the confidentiality, integrity, and availability of ePHI and to implement security measures to reduce risks and vulnerabilities to a reasonable and appropriate level. The Security Rule requires that covered entities and business associates conduct a risk analysis, adopt risk management plans, and implement security measures reducing risks and vulnerabilities to reasonable and appropriate levels. The Security Rule also requires covered entities to implement policies and procedures to ensure the secure handling of ePHI and to train their workforce on the importance of information security.</p> <p>Finally, we have the HIPAA Breach Notification Rule. This rule requires covered entities to notify individuals, the Department of Health and Human Services, and, in some cases, the media of a breach of unsecured protected health information, or PHI. A breach is defined as the acquisition, access, use, or disclosure of PHI in a manner not permitted under the HIPAA Privacy Rule that compromises the security or privacy of the PHI. Covered entities must notify affected individuals of a breach without unreasonable delay and no later than 60 days after the breach is discovered. If the breach affects 500 or more individuals, the covered entity must also notify the media and the Department of Health and Human Services. If the breach affects fewer than 500 individuals, the covered entity must maintain a record of the breach and provide notification to the Department of Health and Human Services on an annual basis.</p>
		<p>4.1.2 PHI & PII</p>	<p>Personal Health Information (PHI) refers to any information that can be used to identify an individual and that relates to their health, healthcare treatment, or payment for healthcare services. This can include information such as medical diagnoses, treatment plans, medications, and lab results.</p> <p>Personally Identifiable Information (PII) refers to any information that can be used to identify an individual, such as their name, address, date of birth, or Social Security number.</p> <p>Keeping PHI and PII secure is crucial to protect the privacy of individuals and to comply with legal requirements. In the healthcare industry, there are strict regulations in place to protect this information, including the Health Insurance Portability and Accountability Act (HIPAA) in the United States.</p> <p>To keep PHI and PII secure, it is important to implement physical, administrative, and technical safeguards. This can include measures such as password protection, encryption, and access controls to limit who can view or access the information. Making sure to keep desk and drawers locked when not in use, and keeping computer screens faced away from public view are all important measures to keep in mind while ensuring the safety of this information.</p> <p>As a Pharmacy/Courier Agent, it is essential to understand the importance of keeping PHI and PII secure and to be familiar with the relevant regulations and best practices. The Agent must ensure to follow the protocols and guidelines to protect the patient's information and make sure that the patient's information is not shared to unauthorized personnel.</p>
	<p>4.2. Utah State law</p>		<p>State law requires that medical cannabis pharmacies maintain treatment files and other records in accordance with the federal Health Insurance Portability and Accountability Act (HIPAA) of 1996 as amended. State law requires that agents safeguard all information about a medical cannabis cardholder that is stored in or retrieved from the electronic verification system (EVS) and the inventory control system (ICS).</p>

		4.2.1 Minimum Necessary Standard	Private health information (PHI) should only be used or disclosed when it is necessary to satisfy a particular business purpose or to carry out a business function. Otherwise, it should not be used or disclosed. An agent is prohibited from accessing information about family members, neighbors, friends or co-workers without an official business purpose to access the information.
Section 5 General Pharmacy Operating Procedures			Every medical cannabis pharmacy has its own operating procedures specific to the building, team, and goals of the organization. Despite this, there are a number of regulatory protocols to be followed regardless of the pharmacy you work for.
	5.1 Approved Operating Plan		All cannabis pharmacies must have an operating plan approved by the Department of Health and Human Services. This plan should specify the details of operations and designate areas of the facility that are intended for specific purposes of the process. All operating plans have to be approved by the CMC Compliance team, and any changes to operations like hours, policy or processes have to be submitted through a change request form and approved by the CMC.
		5.1.1. Storage, Handling, and Inventory Control	All cannabis and cannabis-related products must be stored at least 6-inches off the ground, and kept away from pests, dirt and debris. Storage areas must be kept neat and organized in order to prevent mixups, and in sanitary conditions to deter the growth of microorganisms and/or mold. All chemicals, cleaners, or any other material which is NOT cannabis must be stored in a separately contained area. As we mentioned in the health and safety section, all areas of the facility must be compartmentalized by function, and only accessible to necessary registered cannabis agents. Cannabis must be kept in a condition which is clean and sanitary. Meaning that all cannabis products must be kept at least six inches from the ground, and free of dirt and debris. Cannabis must be stored in a manner which does not allow pests/vermin to seek harborage near or access the medical cannabis.
		5.1.2. Security and Visitors	A cannabis facility must have security equipment, such as video surveillance and an alarm system with perimeter detection, with the ability to notify law enforcement if there is a breach of security after hours. Security footage must be stored for at least 45 days. The only persons allowed to enter a medical cannabis pharmacy are the following: -Pharmacy Medical Provider -Pharmacy Agent -Courier Agent -Registered Patient, or Caregiver/Guardian -DHHS/UDAF employee (or other individual designated by the Dept.) -Visitors having been properly logged, with identification, and escorted by a Cannabis Agent at all times. Visitors must be properly logged and given a facility ID badge that must be displayed at all times. Visitors must be escorted throughout the facility by a registered cannabis agent. Visitors logs must be stored for a minimum of one year. Visitors must be properly logged and given a facility issued ID badge, which must be displayed at all times and visitors must be escorted throughout the facility by one of the facility's registered cannabis agents. Visitors cannot handle cannabis in any form while onsite the facility.
		5.1.3. Mandatory notifications	Every medical cannabis pharmacy, and the corresponding agents working within the facility, must disclose dispensing limits and offer counseling with a PMP. In a 28-day period a patient is allowed to purchase up to 113 grams of raw-unprocessed cannabis flower or 20 grams of total composite THC. Guardians are Intended for patients who are under 18 years of age. Each medical cannabis pharmacy must post a sign stating the maximum allowable limits a patient may purchase within any one 28-day period. At the end of every sale, the Pharmacy agent must affirmatively ask the patient "Do you have any questions for the pharmacist?" This gives the patient a chance to ask about any repercussions; drug interactions; or side effects, and is legally mandated.
		5.1.4. Transportation	Whether delivering cannabis to a patient's home, providing product to another pharmacy, or accepting incoming inventory, these elements of transportation are strictly regulated and must be handled accordingly. It's important to note, a transportation manifest must accompany an incoming delivery of cannabis from a production establishment in order to compliantly receive the shipment.

		<p>5.1.5 Returns, defects, recall, and waste disposal</p>	<p>Facilities must have a procedure in place to handle all product complaints and possible recall protocols. Each facility must have at least one individual designated as a "Recall Coordinator."</p> <p>Recalls may be issued by either department based on findings from mandatory testing within the supply chain, or internal findings from the facility. CFR 21 part 111 defines Product Complaints as communication that contains any allegation: written, electronic, or oral, that expresses concern for any reason with the quality of a dietary supplement.</p> <p>Examples include: Foul odor/off taste Illness/injury Disintegration time Variation of color, size, fill amount, or potency of product Variation of package, or label Foreign material</p> <p>Establishments must have a notification plan, and a written process to retrieve and destroy product—designating one staff member as a Recall Coordinator. Recall may be voluntary or mandatory based on findings, testing, or department inspections.</p>
	<p>5.2. Health and Safety</p>		<p>The purpose of workplace safety is to provide a safe and healthful workplace for all parties involved. Even though the cannabis industry is not federally recognized, many state and federal agencies treat the cannabis industry just like any other.</p> <p>Employers are responsible for providing training to employees on all equipment and processes used throughout production, and any expectation of duties assigned to the employee.</p> <p>The employer is responsible for providing risk management operations, and Personal Protective Equipment (PPE). This includes single time use items such as gloves and hairnets, or more permanent measures such as protective eyewear, respirators, or machine controls.</p> <p>The written procedures an employer must have on file include everything from emergency procedures, to Storage and Handling. Everything that goes on within a cannabis pharmacy must be printed out on a physical sheet of paper and put on file both internally within the organization, as well as with the Utah Department of Health and Human Services. Compartmentalizing areas based on function provides a measure of safety and quality control.</p> <p>Additionally, Employers must NOT allow employees who report being sick or ill, or appear to be showing clear signs of illness, to work within the facility. Employees have a legal right to a safe and healthful workplace, and to request hazard reports or any other workplace safety information the facility may have on record. Employees also have the right to request the correction of an identified hazard in the workplace, file a complaint with OSHA if the employer refuses to correct the hazard, and to participate in an official investigation without fear of retaliation. In short, an employee can ask for a safer work environment and not be terminated for it.</p> <p>Employees also carry the responsibility of PROPERLY using the Personal Protective Equipment (PPE) provided, as instructed, by the employer.</p>
		<p>5.2.1 Right to know/MSDS</p>	<p>Any chemical in use in the facility, it must be compiled into an MSDS (Material Safety Data Sheet). In the event of an injury or exposure to chemicals, the employee should proceed immediately to the nearest First Aid or emergency wash station, and the workplace accident should be reported to the Workplace Safety Manager or the direct supervisor of the employee involved in the accident. Reporting workplace accidents and/or injuries is not only the right thing to do—it is State and Federal law.</p>
		<p>5.2.2. Personal hygiene & PPE</p>	<p>Sanitation and Hygiene measures including washing hands, wearing outer garments to protect against falling hair or other items that might cause contamination, and creating a sterile environment are important. Remember we are talking about items for human consumption. These environments should be akin to a food processing or pharmaceutical processing facility.</p> <p>The written procedures an employer must have on file include everything from Emergency procedures to Storage and Handling. As a reminder, everything that goes on within a cannabis production facility must be printed out on a physical sheet of paper and put on file both internally within the organization, as well as with the Utah Department of Health and Human Services. These Measures reduce the risk of contamination by microorganisms, chemicals, and unseen debris, which can cause possible harm to an individual who consumes the product.</p> <p>Quality control personnel are responsible for upholding personal hygiene measures that might interfere with the sanitary production of items intended for human consumption.</p>
		<p>5.2.3. Emergency procedures</p>	<p>Any chemical in use in the facility, it must be compiled into an MSDS (Material Safety Data Sheet). In the event of an injury or exposure to chemicals, an employee should proceed immediately to the nearest First Aid or emergency wash station. As well, the workplace accident should be reported to the Workplace Safety Manager or the direct supervisor of the employee involved in the accident. Reporting workplace accident and/or injuries is not only the right thing to do—Its State and Federal law</p>

	<p>5.3. Inspections</p>	<p>Both the Utah Department of Health and the Utah Department of Agriculture and Food may inspect a medical cannabis pharmacy or medical cannabis courier, as well as any Cannabis Agent. A State representative must be given immediate access to perform an inspection; failure to do so may result in a notice of violation and the possibility of a citation.</p> <p>A State Employee, from either department, is allowed to inspect;</p> <ul style="list-style-type: none"> -All records, documents or data; whether physical or electronic -Any company, or private, vehicle that is on-site the premises of the licensed facility -Owners and employees -Methods, operations, and procedures -Equipment, tools, and machinery -Containers, labels -Cannabis and its' products <p>Either department may seize any item of questions as needed for the course of an investigation. This includes the ability to take a representative sample from a batch of medical cannabis products within the inventory of the medical cannabis pharmacy. Up to and including possible cease and desist of operations.</p> <p>Providing support to the department during the course of an inspection is always in the best interest of the patients, the pharmacy, and the program as a whole. It is important to understand the roles a cannabis agent plays in the safety and security of the overall medical cannabis program. Being able to act as a knowledgeable professional throughout the course of respected career requires careful attention to detail and conscious action.</p>
<p>Section 6 Roles and Responsibilities of a Pharmacy / Courier Agent</p>		<p>Pharmacy and/or Agents are primarily responsible for performing the transaction between a medical cannabis pharmacy and a registered patient. An agent may describe products, lookup patient information, and provide an opportunity to schedule a consultation with a Pharmacist.</p> <p>Pharmacy agents are required to have a certification in Utah Cannabis Law and Best Practices, which this training fulfills. Likewise, Cannabis Agents must be approved by the department and be registered in the Electronic Verification System before beginning work.</p>
	<p>6.1. Prohibited Activities</p>	<p>While celebrating the culture of cannabis, pharmacy agents can still maintain a progressive standard of what it means to provide alternative medications to their communities. Individuals should refrain from using foul language and slang while performing duties of a cannabis agent. It is against lawful regulation to consume medical cannabis products onsite a licensed facility, or during the course of an official transportation. Likewise, there may be no free samples given to patients, visitors, or cannabis agents; this includes "non-medicated" variations of medical cannabis products.</p> <p>The following duties cannot be performed by a pharmacy agent:</p> <ul style="list-style-type: none"> -receive dosing guidelines for a patient's recommendation; -determine or modify dosage guidelines in a patient's recommendation; -provide counseling or consultation regarding a patient's medical condition or medical treatment. <p>ONLY a Pharmacy Medical Provider, or the patients Recommending Medical Provider is authorized to provide a patient with information on the type of medical cannabis product to use, and dosage amount, for a Qualifying Medical Condition.</p>
	<p>6.2. Authorized duties</p>	<p>The primary responsibility of a pharmacy agent and/or courier agent is to conduct professional interactions with registered cardholders. This involves:</p> <ul style="list-style-type: none"> -properly checking-in a cardholder to the pharamacy -performing a sales transaction -scheduling a patient consultation with a Pharmacy Medical Provider -preparing and managing inventory through storage and handling techniques that are industry best practice and uphold product integrity for patient safety. <p>Additionally, Pharmacy Agents are required to conduct themselves professionally. Similar to a traditional pharmacy environment, medical cannabis pharmacy agents should uphold standards applicable to other medical settings.</p> <p>A pharmacy agent may provide a patient with the following information about medical cannabis product;</p> <ul style="list-style-type: none"> -manufacturer name, -Product name/type -the process of manufacture -composition such as terpene and cannabinoid profile, and other ingredients -the manufacturers intended route of administration. -The Certificate of Analysis (COA) <p>Pharmacy Agents may also provide any educational material[s] authorized by the Dept.</p>

		<p>6.2.5. Inventory management</p>	<p>This is where a pharmacy agent will likely get well acquainted with the various types of products available in their pharmacy.</p> <p>Inventory management processes for a medical cannabis pharmacy involve several key steps to ensure that the products on hand are properly tracked, stored, and accounted for. This may include the following steps:</p> <p>Ordering products: The pharmacy will need to order products from authorized cannabis producers in order to stock its inventory. This process may involve placing orders through an inventory control system and may require approval from a Pharmacy Medical Provider.</p> <p>Receiving products: When products are delivered to the pharmacy, they must be received and checked for accuracy against the order. This process may involve counting the products, inspecting them for quality, and noting any discrepancies.</p> <p>Storing products: Once products have been received and checked, they must be stored in an appropriate manner. This may involve storing products in a secure, temperature-controlled room or cabinet, and keeping them away from light and heat.</p> <p>Tracking products: The pharmacy must keep track of the products it has in inventory, including how much is on hand, how much has been sold, and when products are expected to be restocked. This process may involve using an inventory control system to track product information.</p> <p>Dispensing products: When products are sold to patients, they must be dispensed in an accurate and appropriate manner. This process may involve counting out the correct amount of product, preparing labels and receipts, and providing instructions for use.</p> <p>Conducting inventory counts: The pharmacy must conduct regular inventory counts to ensure that product information is accurate and that there is no discrepancy between what is on hand and what is recorded in the inventory system.</p> <p>Discarding expired or damaged product: The pharmacy must discard any products that are expired or damaged in order to maintain patient safety. This may involve returning products to the supplier or properly disposing of them.</p> <p>Overall, the inventory management process for a medical cannabis pharmacy is critical for ensuring that patients receive safe, effective products and that the pharmacy is in compliance with state regulations.</p>
	<p>6.3. The patient interaction</p>		
		<p>6.3.1. Scheduling a patient consultation with a PMP</p>	<p>While a pharmacy agent may be knowledgeable about medical cannabis and the product itself, ONLY a Pharmacy Medical Provider is allowed to provide insights, feedback, and additional information to a patient on the effects of medication.</p>
		<p>6.3.2. Card-holder / Visitor Check-in</p>	<p>The patient check-in process, from the point of view of a pharmacy agent, would involve verifying the patient's identification and medical cannabis card, and updating the patient's information in the electronic verification system (EVS). The agent would also ensure that the patient's dosage parameters and purchase limits are up to date, and that any new or updated information from the patient's Recommending Medical Provider is entered into the EVS.</p> <p>The visitor check-in process is a set of steps that ensure that any visitor entering a medical cannabis pharmacy is authorized to be there, and is escorted by a registered cannabis agent or Pharmacy Medical Provider at all times. The process typically includes the following steps:</p> <p>The visitor must present a valid form of identification, such as a driver's license or passport, to the pharmacy agent at the front desk.</p> <p>The pharmacy agent will verify the visitor's identification and ensure that the visitor is not on any restricted or banned lists.</p> <p>The pharmacy agent will log the visitor's information into the pharmacy's system, including the visitor's name, date of visit, and the purpose of their visit.</p> <p>The visitor will be issued a visitor badge or other form of identification, which they must wear while on the pharmacy's premises.</p> <p>The visitor will be escorted by a registered cannabis agent or Pharmacy Medical Provider throughout their visit, and the escort will be responsible for ensuring that the visitor does not access any restricted areas or perform any unauthorized activities.</p> <p>At the end of the visitor's visit, the pharmacy agent will log the visitor out of the system, and the visitor will be required to return their visitor badge or other form of identification before leaving the premises.</p>

		<p>6.3.3. Performing a sales transaction</p>	<p>Before the transaction can take place, the pharmacy agent must validate that the individual intending to purchase;</p> <ul style="list-style-type: none"> a) has a valid medical cannabis registration card and is properly registered in the EVS, and b) has a valid form of government issued identification <p>At the end of every sale, the Pharmacy agent should affirmatively ask the patient "Do you have any questions for the pharmacist?" This supports the regulatory requirement to offer a patient the with the ability to consult with the pharmacist about their medication.</p> <p>Make sure to say "Thank you, and have a great day!" You never know what someone is going through. This process could have just been what made the difference. Take time, and appreciate yourself and your co-workers for what it is that you do. Provide health and wellness to your local community!</p>
Conclusion			