#### (FINAL/APPROVED)

#### VIRGINIA BOARD OF PHARMACY MINUTES OF BOARD RETREAT

| April 16, 2019<br>Commonwealth Conference<br>Center<br>Second Floor<br>Board Room 2 | Department of Health Professions<br>Perimeter Center<br>9960 Mayland Drive<br>Henrico, Virginia 23233                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CALL TO ORDER:                                                                      | The meeting of the Board of Pharmacy was called to order at 9:05 am                                                                                                                                                                                                                                                                                                                                                              |
| PRESIDING:                                                                          | Rafael Saenz, Chairman                                                                                                                                                                                                                                                                                                                                                                                                           |
| MEMBERS PRESENT:                                                                    | Glenn L. Bolyard, Jr.<br>Melvin L. Boone, Sr.<br>Cheryl H. Nelson<br>Kristopher S. Ratliff<br>Patricia Richards-Spruill<br>Rebecca Thornbury<br>Cynthia Warriner                                                                                                                                                                                                                                                                 |
| MEMBER ABSENT:                                                                      | James L. Jenkins, Jr.<br>Ryan Logan                                                                                                                                                                                                                                                                                                                                                                                              |
| STAFF PRESENT:                                                                      | Caroline D. Juran, Executive Director<br>J. Samuel Johnson, Jr., Deputy Executive Director<br>Beth O'Halloran, Deputy Executive Director<br>Ellen B. Shinaberry, Deputy Executive Director<br>Elaine Yeatts, Senior Policy Analyst, DHP<br>David E. Brown, D.C., Director, DHP<br>Barbara Allison-Bryan, M.D., Chief Deputy Director, DHP<br>James Rutkowski, Assistant Attorney General<br>Kiara Christian, Executive Assistant |
| GUEST SPEAKERS:                                                                     | Carmen Catizone, MS, RPh, DPh, Executive Director/Secretary, National<br>Association of Boards of Pharmacy<br>Peter Vlasses, PharmD, DSc(Hon), FCCP, Executive Director, Accreditation<br>Council for Pharmacy Education<br>Aron Lichtman, PhD, Professor and Associate Dean of Research and Graduate<br>Studies, VCU School of Pharmacy<br>Al Domeika, Pharmacist-in-Charge, Prime Wellness of Connecticut                      |
| QUORUM:                                                                             | With eight members present, a quorum was established.                                                                                                                                                                                                                                                                                                                                                                            |
| APPROVAL OF AGENDA:                                                                 | The agenda was unanimously approved as presented.                                                                                                                                                                                                                                                                                                                                                                                |

Virginia Board of Pharmacy Minutes April 16, 2019

PURPOSE OF MEETING:

Learning session for the Board of Pharmacy members to provide education on topics of Standards of Care, Pharmacy Technician Education Standards, Endocannaboid System and Cannaboid Research, and Medical Marijuana Dispensary Operations. Board members asked questions of the presenters following each presentation.

**PRESENTATIONS:** 

STANDARDS OF CARE REGULATORY APPROACH (ATTACHMENT 1)

PHARMACY TECHNICIAN EDUCATION STANDARDS (ATTACHMENT 2)

ENDOCANNABINOID SYSTEM AND CANNABIS RESEARCH (ATTACHMENT 3)

MEDICAL MARIJUANA DISPENSARY OPERATIONS (ATTACHMENT 4)

UPDATE ON IMPLEMENTATION OF PHARMACEUTICAL PROCESSOR PROGRAM

**ADJOURN:** 

Carmen Catizone, MS, RPh, DPh, Executive Director/Secretary, National Association of Boards of Pharmacy provided a presentation on the topic of Standard of Care Regulatory Approach.

Peter Vlasses, PharmD, DSc(Hon), FCCP, Executive Director, Accreditation Council for Pharmacy Education, provided a presentation on the topic of Pharmacy Technician Education Standards.

Aron Lichtman, PhD, Professor and Associate Dean of Research and Graduate Studies, VCU School of Pharmacy, provided a presentation discussing the topic Endocannabinoid System and Cannabis Research.

Al Domeika. Pharmacist-in-Charge provided a presentation on the topic of Medical Marijuana Dispensary Operations.

Ms. Juran, Mr. Johnson, and Melody Morton provided a brief presentation to update the board on the status of the pharmaceutical processor program.

With all business concluded, the meeting adjourned at 3:15 pm.

Rafael Saewz, Chairman

Caroline D. Juran, Executive Director

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# Standard of Care Regulatory Approach

Virginia Board of Pharmacy Retreat 2019

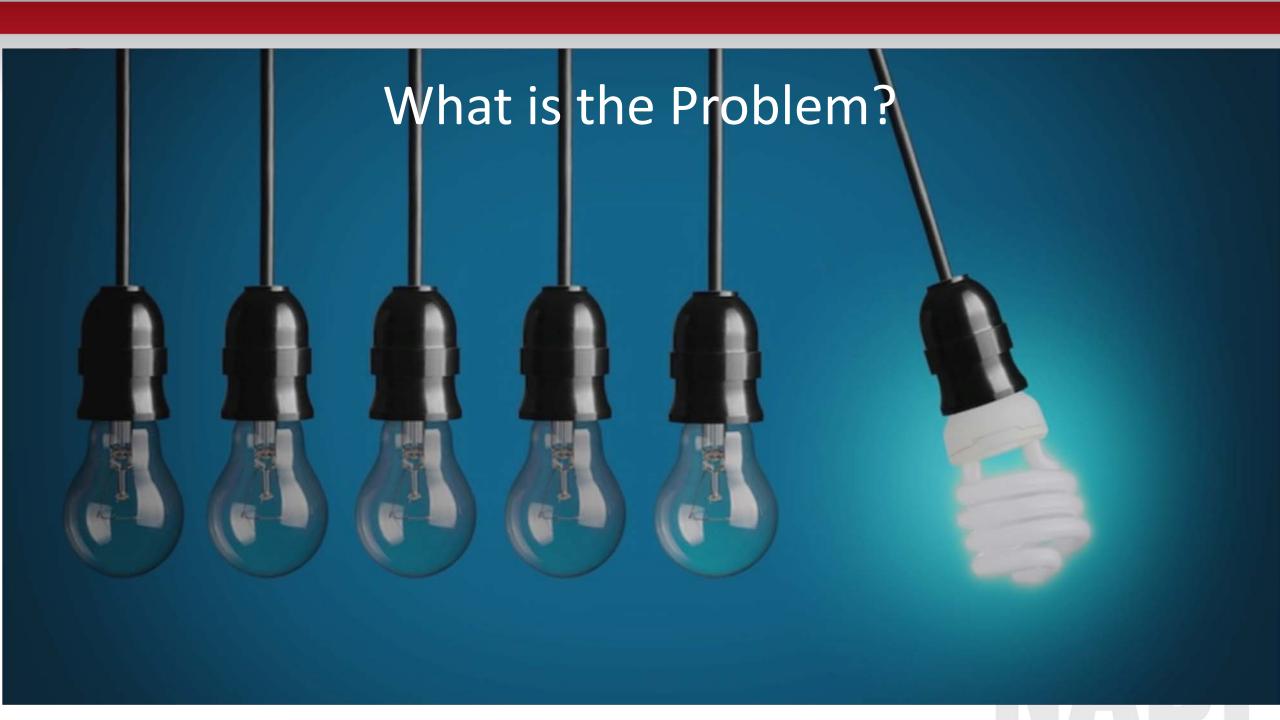


Report of the Task Force to Develop Regulations Based on Standards of Care

The Task Force met on October 9-10, 2018, at NABP Headquarters.

Established in response to Resolution 114-4-18, Task Force to Develop Regulations Based on Standards of Care I'm not interested in preserving the status quo; I want to overthrow it. Niccolo Machiavelli

RrainyQuote





- Regulate the practice of pharmacy to ensure protection of the public
  - License pharmacists, pharmacies, technicians (individuals cannot practice pharmacy or sell prescription medication without being licensed by the state board)
  - Develop, adopt and enforce pharmacy practice statutes and regulations
  - Perform regular onsite practice compliance reviews and inspections
  - Discipline



Relevant? Effective? Dynamic? Clear?





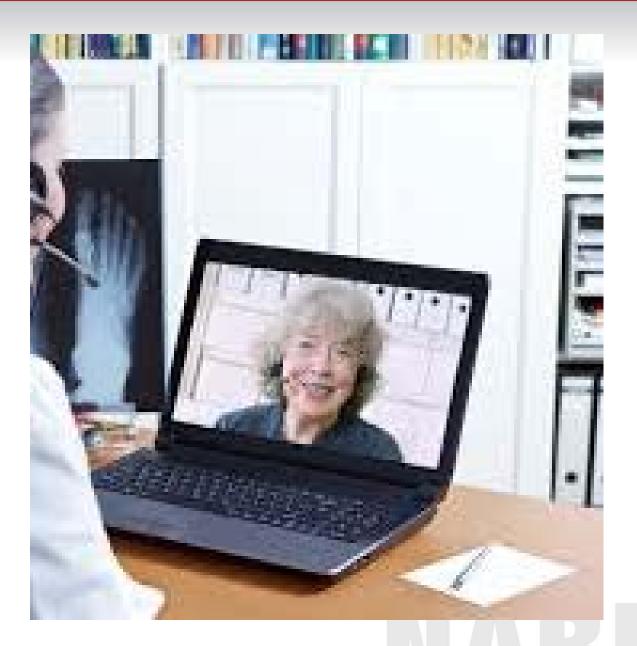
# **NABP Task Force**

#### **Recommendation 1:**

NABP Should Encourage State Boards of Pharmacy to Review Their Practice Acts and Regulations, Consistent With Public Safety, to Determine What Regulations Are No Longer Applicable or May Need to Be Revised or Eliminated While Recognizing Evolving Pharmacy Practice.



Recommendation 2: NABP Should Encourage State Boards of Pharmacy to Consider Regulatory Alternatives for Clinical Care Services That Require Pharmacy Professionals to Meet the Standard of Care.



# New Regulatory Philosophies



"Permissionless innovation refers to the notion that experimentation with new technologies and business models should generally be permitted by default. Unless a compelling case can be made that a new invention will bring serious harm to society, innovation should be allowed to continue unabated and problems, if any develop, can be addressed later."





#### Defined

**Origins in medical malpractice** 

Standard of Care  $\cong$  Breach of Duty

**Defined as Custom** 

**Defining court cases** 

TJ Hooper 1932 - reasonable prudence Helling vs Carey 1974 - custom not key factor Legal profession and jury not the medical profession





# Standard of Care

Medical malpractice is a legal fault by the physician or surgeon. It arises from the failure of a physician to provide the quality of care required by law. When a physician undertakes to treat a patient, he takes an obligation enforceable by law to use minimally sound medical judgement and render minimally competent care in the course of services he provides.

# Minimally competent care ... EDICALCE

"does not even have to be average ... otherwise 50% of all medical care would be malpractice by definition."

The mere fact that the plaintiff's expert may use a different approach is not considered a deviation from the recognized standard of medical care. Nor is the standard violated because the expert disagrees with a defendant



1975 nurses identified as professionals – other medical professionals

**Legal Definition** 

- **Broad statement**
- Unlikely to be state statutes, public health codes, or practice acts
- Established by ordinary, reasonable nurse
- similar circumstances
- Guidelines do not define standard of care





# Standard of Care

- Duty to the patient
- Nurse breached the duty
- Patient injury occurred
- Casual relationship between the breach of duty and patient injury





- Proportionate
- Consistent
- Targeted
- Transparent
- Accountable





# **Right Touch Regulation**

- Right Touch Regulation
  - "Minimum regulatory force required to achieve the desired result."
  - Agility in regulation "… looking forward to anticipate change rather than looking back to prevent the last crisis from happening again."
- No Zero Risks
- More than one way to solve a problem
- Regulation not always the best answer (example addiction)
- Public protection vs responsiveness to practitioners



# **Right Touch Regulation**

- "Minimum regulatory force required to achieve the desired result."
- Agility in regulation "… looking forward to anticipate change rather than looking back to prevent the last crisis from happening again."
- No Zero Risks
- More than one way to solve a problem
- Regulation not always the best answer (example addiction)
   Public protection vs responsiveness
  - to practitioners





**Recommendation 3:** 

NABP Should Collaborate With States That May Adopt Standards of Care-Based Regulations to Identify, Monitor, and Disseminate Outcomes.

**Recommendation 5:** 

NABP Should Monitor the Adoption of the Standards of Care-Based Regulation Model by the States and, if and When Appropriate, Consolidate and Share Information and Tools Obtained From Professional Regulatory Groups and Relevant Stakeholders for Regulating Standards of Care-Based Practice.

# Pharmacy – Standards of Care

Regulatory standards vs practice standards

DRUG

51

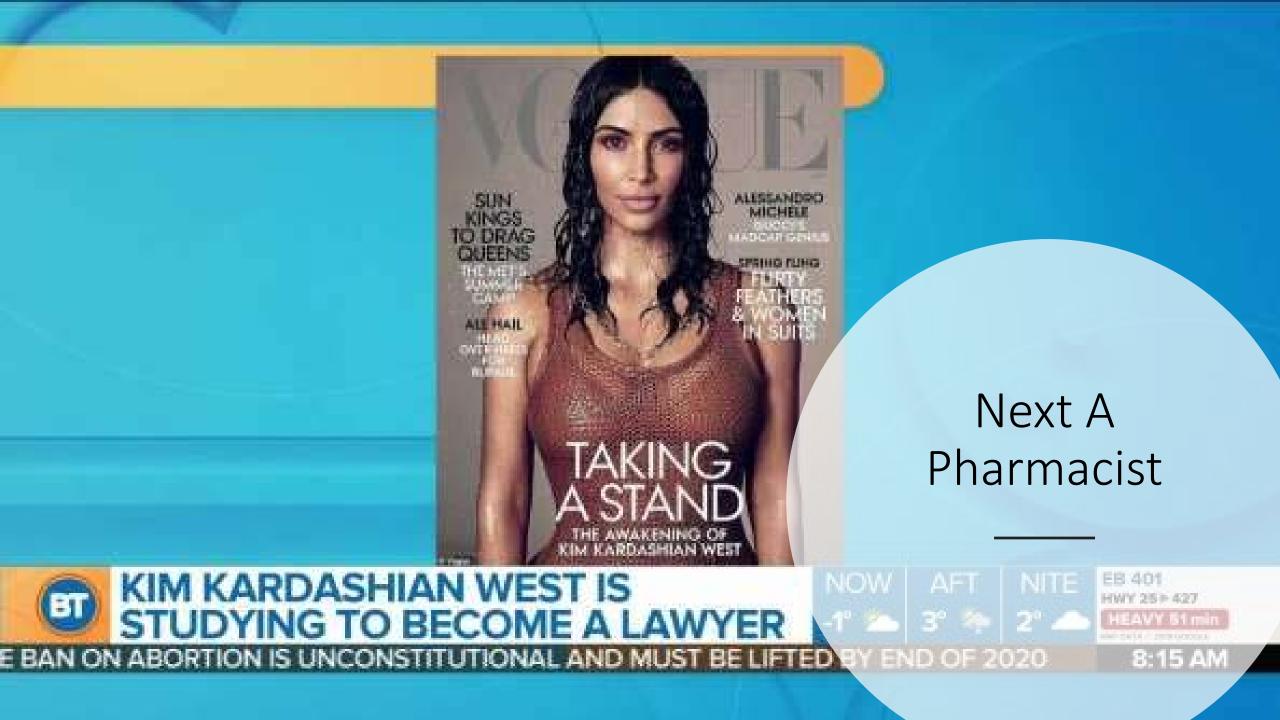
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Check the PMP vs drug, dosage, quantity

Clinical training, experience, and knowledge vital to SOC investigative processes

Changes in SOC - complaint filed, investigation, and ultimately hearing

Finding expert witness for certain SOC – beyond state's border



# New ASHP/ACPE Accreditation Standards for Educational Preparation of Pharmacy Technicians

#### Peter H. Vlasses, PharmD, DSc(Hon), FCCP, ACPE

Virginia Board of Pharmacy Retreat

Perimeter Center, Henrico, VA

April 16, 2019



pharmacists advancing healthcare<sup>®</sup>

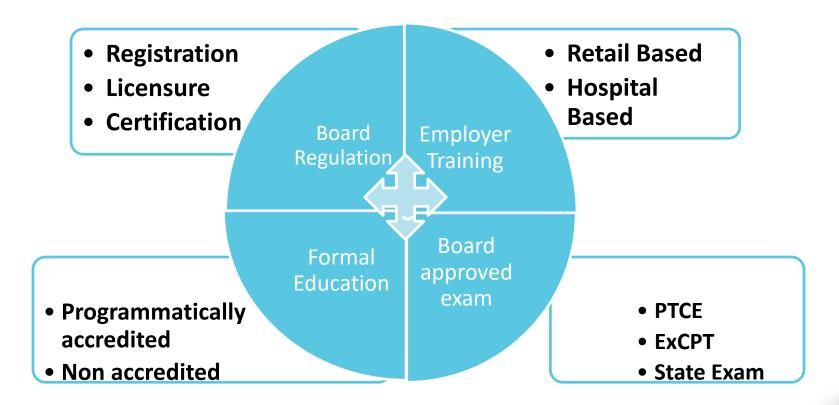


# **LEARNING OBJECTIVES**

- Discuss the variation in pharmacy technician education and accreditation requirements across U.S. states
- Describe the purpose of the 2017 *Pharmacy Technician Stakeholder Consensus Conference* and the consensus reached regarding pharmacy technician education
- Describe the new ASHP/ACPE Accreditation Standards for Pharmacy Technician Education and Training Programs developed in response to the findings of the 2017 Pharmacy Technician Stakeholder Consensus Conference
- Discuss growing support for national education standards for entry level pharmacy technicians



#### VARIOUS POINTS OF ENTRY FOR PHARMACY TECHNICIANS





# TYPES OF PHARMACY TECHNICIAN EDUCATION/TRAINING PROGRAMS

- Certificate and degree programs in community colleges or technical schools
- College of Pharmacy associated programs
- Employer sponsored programs
- High school programs
- Military training programs
- Certification review courses
- Distance education programs



#### PHARMACY TECHNICIAN ACCREDITATION COMMISSION (PTAC)

- ASHP has been accrediting technician programs in the 1970's on a voluntary basis
- In 2012, NABP requests for ACPE to participate in pharmacy technician education and training accreditation
- PTAC formed through ASHP/ACPE collaboration in 2013
- ACPE Board approved ASHP standards, guidelines, and procedures for PTAC
- PTAC recommendations require approval of both ASHP and ACPE Boards
- First PTAC recommendations to ASHP and ACPE boards for accreditation actions occurred at their June 2015 meetings and were approved
- There are 265 ASHP/ACPE accredited pharmacy technician education and training programs and an estimated greater number of unaccredited programs



### **PTAC MEMBERS**

- Donna S. Wall, BCPS, FASHP Chair
- Barbara Lacher, BS, RPHTECH, CPHT Vice Chair
- John J. Smith, ED Past Chair
- Charles E. Daniels, PhD
- Michael Diamond, MSc
- Denise Frank, RPh
- Barbara Giacomelli, PharmD, MBA
- Janet Kozakiewicz, MS, PharmD, FASHP

- Jeannie Pappas, RPT, CPhT
- Matthew A. Rewald, CPhT
- Lisa S. Lifshin, BS Pharm, ASHP Secretary

#### LIAISON TO ACPE BOARD OF DIRECTORS

 Michael A. Moné, RPH, JD, FAPHA

#### LIAISON TO ASHP BOARD OF DIRECTORS

 Kathleen S. Pawlicki, BS Pharm, MS, RPh, FASHP



PHARMACY TECHNICIAN

# Stakeholder Consensus Conference

http://www.ajhp.org/content/ajhp/early/2017/06/07/ajhp170283.full.pdf?sso-checked=true



# WHY NOW?

- Technician roles are evolving and scope of practice is expanding
  - Technicians play integral roles in supporting pharmacists in all practice settings
  - Provider status for pharmacists doesn't work without technicians
  - Complexity + Complications = Collaborative Healthcare
- Greater expectations for technician
  - Not just technical but patient focus
- Regulations governing technician entry & practice vary widely
- Consider standards necessary within the profession to meet demands of growing healthcare system



# **ABOUT THE CONFERENCE**

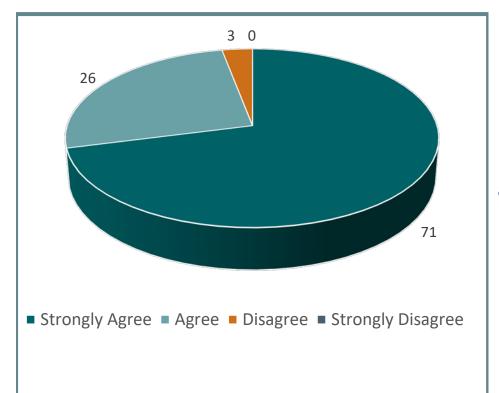
- Planned by PTCB, ASHP, ACPE with the help of a multistakeholder advisory group
- Sponsored by the Pharmacy Technician Certification Board
- Held February 14 16, 2017 in Irving, Texas
- 89 invited participants
- 350 individuals participated remotely in the plenary sessions
- Attendees included the pharmacists and technicians from various types of practice and education settings and public members

# Recommendations from Stakeholder Consensus Conference

- Defining Pharmacy Technicians
- Pharmacy Technician Education
- Required Knowledge, Skills, and Abilities of Entry---Level Pharmacy Technicians
- Certification of Pharmacy Technicians
- State Laws and Regulations on Pharmacy Technicians
- Advanced Pharmacy Technician Practice
- Moving Forward on Pharmacy Technician Issues



## EDUCATION OF PHARMACY TECHNICIANS



Most conferees **agreed that national standards** should guide technician education, and that technician education **programs should be accredited**.



## **Standard Writing Subcommittee\***

- Tim Koch, RPh, PD,CHC Sr Director, Pharmacy Practice Compliance Walmart Corporate Office
- Kenneth Mark Ey, RPh Vice President of Operations CARE Pharmacies Cooperative Inc.
- Rafael Saenz, PharmD, MS, FASHP
   Administrator, Pharmacy Services, University of Virginia
   Health System
   Assistant Dean, VCU School of Pharmacy UVA Division
- John J. Smith, Ed.D
   Deputy Superintendent
   East San Gabriel Valley Regional Occupational Program
   & Technical Center
   West Covina, CA
   PTAC Chair
- Barbara Lacher, BS, RPHTECH, CPHT
   Assistant Program Director & Associate Professor of
   Pharmacy Technician Program
   North Dakota State College of Science
   PTAC Member
- Peter H. Vlasses, PharmD, DSc(Hon), FCCP Executive Director Accreditation Council for Pharmacy Education
  - \*Appointed July 2017

- Janet A. Silvester, PharmD, MBA, FASHP Vice President, Accreditation Services Accreditation Services Office, ASHP
- Lisa S. Lifshin, RPh, BCNSP
   Director of Pharmacy Technician Accreditation and Residency Services.
   Secretary to PTAC
   Accreditation Services Office, ASHP
- Sheri Roumell, BS, CPhT, RPT Pharmacy Technology Program Director Casper College Casper, WY ASHP/ACPE Lead Surveyor
- Donna S. Wall, BCPS, FASHP Clinical Pharmacist Indiana University Hospital Indianapolis, IN PTAC Vice Chair
- Supported by Angela Cassano, PharmD, BCPS, FASHP President
   Pharmfusion Consulting, LLC
   PTAC Member



# **Standard Revision Process**

- Review of the PTSCC recommendations
- PTCE job analysis review
- **ExCPT blue print review**
- Compared job analyses to the existing standard
- Any PTSCC recommended entry-level competencies missing were added
- Separated entry-level competencies from advanced-level competencies



# **Standard Revision Process (cont.)**

- Identified additional advanced-level competencies
- Identified Key Elements for achieving a standard at each level
- Minimum hour requirements have been edited to reflect education and training needs for entry-level and advanced-level competencies and were established by an independent review of the standard by a group of educators



# MOVING FORWARD ON PHARMACY TECHNICIAN ISSUES

- Unanimous agreement that the conference planners should establish a coalition of stakeholders to pursue the consensus recommendations from the conference
- Most conferees agreed that participants in this stakeholder event have a responsibility to work toward achieving the consensus recommendations



# The Stakeholder Advisory Group Members\*

- Ann Barnes, PTEC
- Cynthia Boyle, Univ. Md Eastern Shore
- Malcolm Broussard, LABOP +
- Liz Cardello, APhA
- Al Carter, CVS (now Walgreens) <sup>+</sup>
- Mark Ey, Care Pharmacies<sup>+</sup>
- Diane Halvorson, Nd BOP +
- Tim Koch, Walmart<sup>+</sup>
- Scott Meyers, IL CHP +

- Michael Moné, Cardinal Health
- Matt Osterhaus, Osterhaus Pharmacy<sup>+</sup>
- Sara Roszak, NACDS
- Jon Roth, Ca PhA +
- Rafael Saenz, Univ. VA +
- Ed Sperry, Id BOP
- Ed Webb (now Kathy Pham), ACCP

1

• Lisa Schwartz, NCPA

\*Met October 31<sup>,</sup> 2017 + On PTSCC planning team

Supported by ASHP, ACPE and PTCB staff and facilitated by William Zellmer

# **Standard Revision Process**

- The draft standards were reviewed by the Stakeholder Advisory Group and PTAC in October
- Changes were incorporated
- The new draft was sent to members of the Stakeholder Advisory Group again for additional comment prior to the public comment period
- Went out for stakeholder comment the end of January 2018 for two months
- The writing group reviewed the feedback and submitted their edits to PTAC for their May 2018 meeting for review
- Final draft went from PTAC to the ASHP and ACPE Boards in for approval
- ASHP and ACPE boards approved the new standards in June 2018; posted on both web sites



# **Implementation Timeline**

- The new standards became effective for first time applicant programs as of January 1, 2019.
- Existing accredited pharmacy technician programs will have until January 1, 2020 to incorporate the new standards into their programs and will be surveyed against these revised standards after that date.



#### **Revised ASHP/ACPE Accreditation Standards for Pharmacy Technician Education and Training Programs**

#### **Purpose:**

- protect the public by ensuring the availability of a competent workforce;
- describe pharmacy technician education and training program development at the Entry-level and Advanced-level;
- provide criteria for the evaluation of new and established education and training programs; and
- promote continuous improvement of established education and training programs



### **SECTION I: COMPETENCY EXPECTATIONS**

#### **Entry-Level**

 The program prepares students for practice as Entry-level pharmacy technicians in a variety of contemporary settings (e.g., community, hospital, home care, long-term care) and has students acquire knowledge, skills, behaviors, and abilities needed for such practice.

#### **Advanced-Level**

 The program prepares students for practice as Advanced-level pharmacy technicians, in a broad range of advanced roles in a variety of contemporary settings (e.g., community, hospital, home care, long-term care) and has students acquire additional knowledge, skills, behaviors, and abilities beyond those of the Entry-level pharmacy technician, needed for such advanced practice.

as

#### **Three Sections of the ASHP/ACPE Standards**

- SECTION I: COMPETENCY EXPECTATIONS
  - Standards # 1 to 5
- SECTION II: STRUCTURE AND PROCESS TO PROMOTE ACHIEVEMENT OF COMPETENCY EXPECTATIONS
  - Standards # 6 to 13
- SECTION III: ASSESSMENTS OF STANDARDS AND KEY ELEMENTS
  - Standards # 14 to 15



### **SECTION I: COMPETENCY EXPECTATIONS**

- Standard 1: Personal/Interpersonal Knowledge and Skills
  - Entry-level: 8 Key Elements
  - Advanced-level: 4 Key Elements
- Standard 2: Foundational Professional Knowledge and Skills
  - Entry-level: 8 Key Elements
  - Advanced-level: 3 Key Elements
- Standard 3: Processing and Handling of Medications and Medication Orders
  - Entry-level: 22 Key Elements
  - Advanced-level: 9 Key Elements
- Standard 4: Patient Care, Quality and Safety Knowledge and Skills
  - Entry-level: 8 Key Elements
  - Advanced-level: 5 Key Elements
- Standard 5: Regulatory and Compliance Knowledge and Skills
  - Entry-level: 8 Key Elements
  - Advanced-level: 2 Key Elements



#### SECTION II: STRUCTURE AND PROCESS TO PROMOTE ACHIEVEMENT OF EDUCATIONAL OUTCOMES

- Standard 6: Authority and Responsibility provided to Program Director
  - 9 Key Elements
- Standard 7: Strategic Plan
  - 2 Key Elements
- Standard 8: Advisory Committee
  - 5 Key Elements

#### • Standard 9: Curricular Length

- Entry-level: 4 Key Elements
- Advanced-level: 2 Key Elements



SECTION II: STRUCTURE AND PROCESS TO PROMOTE ACHIEVEMENT OF EDUCATIONAL OUTCOMES Standard 9: Curricular Length

- Entry-level: 400 hours, ≥ 8 weeks
  - 300 hours divided as:
    - Didactic 120 hours
    - Simulation 50 hours
    - Experiential 130 hours
  - 100 hours allocated as program director and faculty see fit
- Advanced-level: 600 hours, ≥ 15 weeks (includes Entry-level hrs)
  - 460 hours divided as:
    - Didactic 160 hours (40 more hours beyond Entry-level)
    - Simulation 100 hours (50 more beyond Entry-level)
    - Experiential 200 hours (70 more hours beyond Entry-level)
  - 140 hours allocated as program director and faculty see fit

#### SECTION II: STRUCTURE AND PROCESS TO PROMOTE ACHIEVEMENT OF EDUCATIONAL OUTCOMES (cont.)

- Standard 10: Curricular Composition and Delivery (includes distance learning expectations)
  - 8 Key Elements; Distance Learning 4 Key Elements
  - Entry-level: Students complete at least one experiential rotation in a dispensing pharmacy setting where the student will utilize skills learned during their entry-level curriculum
  - Advanced-level: Students complete at least one additional experiential rotation, in addition to any completed during an entry-level program. This advanced experiential rotation takes place in a facility where the student will utilize skills learned during the advancedlevel curriculum.
- Standard 11: Student Recruitment, Acceptance, Enrollment, and Representation - 8 Key Elements
- Standard 12: Faculty/Instructors 4 Key Elements
- Standard 13: Documentation 8 Key Elements



#### SECTION III: ASSESSMENTS OF STANDARDS AND KEY ELEMENTS

- Standard 14: Assessment of Competency Expectations
  - 14.1 Student Learning Assessments 6 Key Elements
  - 14.2 Program assessments 5 Key Elements
    - (a) program completion;
    - (b) performance on national certification examinations or; performance on a psychometrically valid evaluation;
    - (c) program satisfaction, including student, graduate, and employer satisfaction;
    - (d) job placement; and
    - (e) assessment data used in the continuous quality improvement process is actively maintained.
- Standard 15: Assessments of Structure and Process
  - 3 Key Elements

#### Pharmacy in relation to other Allied Health Professions standards for support staff education

| Allied Health Position                              | Training                                                                    |
|-----------------------------------------------------|-----------------------------------------------------------------------------|
| Clinical Lab Technician                             | 2-4 years                                                                   |
| Dental Hygienist                                    | 2-6 years                                                                   |
| Dental Assistant                                    | 1-2 years                                                                   |
| Dietetic Technician                                 | 3-4 years                                                                   |
| Medical Assistant                                   | 1-2 years                                                                   |
| Occupational Therapy Assistant                      | 2 years                                                                     |
|                                                     |                                                                             |
| Pharmacy Technician                                 | Entry Level - 400 hours >= 8 weeks<br>Advanced Level -600 hours >= 15 weeks |
| Pharmacy Technician<br>Physical Therapy Assistant   |                                                                             |
|                                                     | Advanced Level -600 hours >= 15 weeks                                       |
| Physical Therapy Assistant                          | Advanced Level -600 hours >= 15 weeks<br>2 years                            |
| Physical Therapy Assistant<br>Surgical Technologist | Advanced Level -600 hours >= 15 weeks<br>2 years<br>1-2 years               |

ask

#### Presentations re: New Pharmacy Technician Education Accreditation Standards

#### 2018

- Joint Commission of Pharmacy Practitioners
- VSHP Spring Commonwealth Leadership Forum
- All five NABP/AACP District meetings
- Maryland Technician Consensus Conference
- ASHP Midyear meeting
- Vizient Pharmacy Leadership meeting
- Illinois Collaborative Pharmaceutical Task Force

#### 2019

- APhA Annual Meeting
- Virginia Board of Pharmacy
- Pharmacy Technician Educators Council



#### **RECENT JCPP PRESS RELEASE**

National pharmacy organization members of the Joint Commission of Pharmacy Practitioners (JCPP) have agreed to support "the adoption of national standards to ensure that pharmacy technician education consistently achieves quality outcomes." Their statement of support adds, "In applying developed standards, accrediting bodies should allow for innovation and flexibility in program delivery." The following organizations worked to draft the statement, and their boards have voted to support the adoption of national standards:

- Academy of Managed Care Pharmacy
- Accreditation Council for Pharmacy Education
- American Association of Colleges of Pharmacy
- American College of Apothecaries
- American College of Clinical Pharmacy
- American Pharmacists Association

- American Society of Consultant Pharmacists
- American Society of Health-System Pharmacists
- College of Psychiatric and Neurologic Pharmacists
- Hematology/Oncology Pharmacy Association
- National Alliance of State Pharmacy Associations
- National Association of Boards of Pharmacy

# **LEARNING OBJECTIVES**

- Discuss the variation in pharmacy technician education and accreditation requirements across U.S. states
- Describe the purpose of the 2017 *Pharmacy Technician Stakeholder Consensus Conference* and the consensus reached regarding pharmacy technician education
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- Discuss growing support for national education standards for entry level pharmacy technicians



#### **QUESTIONS?**



### Endocannabinoid System and Cannabis Research

Aron H. Lichtman Department of Pharmacology and Toxicology Department of Medicinal Chemsitry



#### Disclosures

#### Scientific Advisory Board member

- Abide Therapeutics
- Sea Pharmaceuticals

#### Consulting

- F. Hoffmann-La Roche Ltd
- Corbus Pharmaceutics

# Learning Objectives

- a. REVIEW the primary constituents of cannabis and their mechanisms of action.
- b. Identify key components and physiologic effects of the endogenous cannabinoid system
- c. REVIEW the physical properties and effects of synthetic cannabinoid drugs



# The Paradox of "Medical" Cannabis

Although most states in the USA have legalized cannabis and/or its primary constituents for medical use, it remains illegal under the federal law



# Many originally plant-derived medications work upon endogenous systems

Cannabis

Willow Tree Salix





Foxglove Digitalis purpurea



Opium *Lachryma papaveris* 

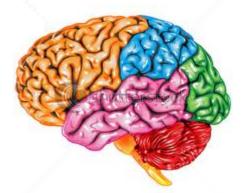


### What are Cannabinoids?

Diverse drug class of differing chemical structures



Originally discovered in marijuana

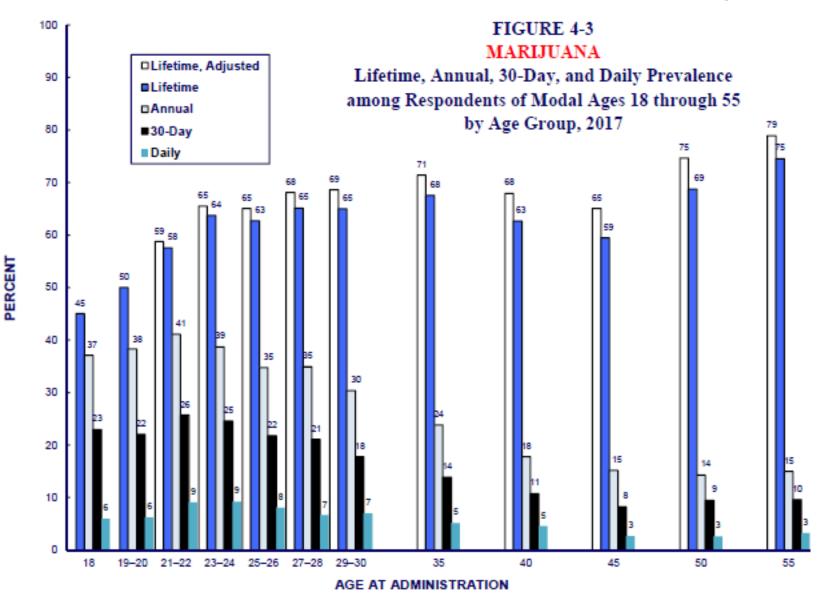


Present in the brains and bodies of humans and other animals



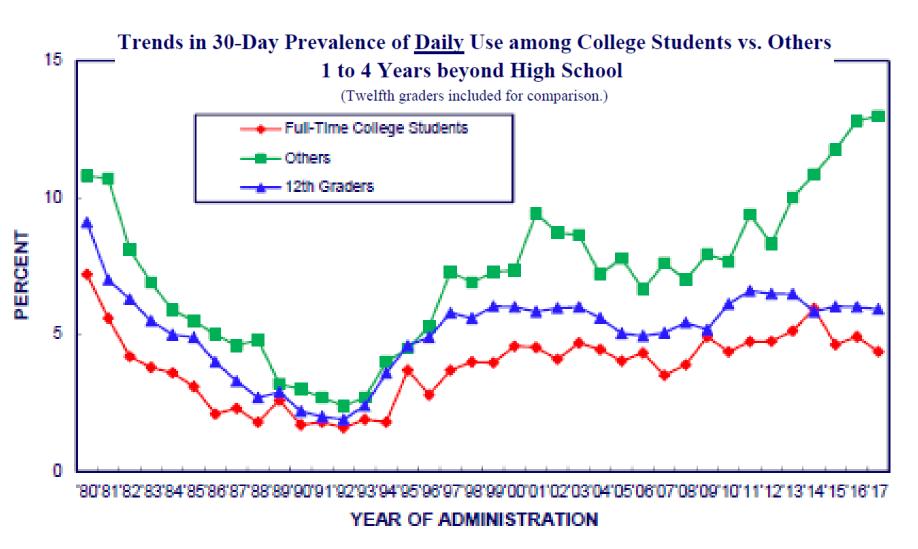
Synthesized by chemists

### **Most Adults Have Smoked Marijuana**



http://www.monitoringthefuture.org/

# **Cannabis Use in Young Adults: Daily**



### **Cannabis Intoxication in Humans**



Intoxicating effects "High" Mild euphoria and relaxation Perceptual alterations Time distortion Ordinary sensory experiences intensified Increased sociability

# **Pharmacological Properties in Humans**

- Heart rate increased (common effect)
- Blood pressure generally unchanged
- Orthostatic hypotension (high doses)
- Diuretic effects
- Conjunctival reddening
- ✓ Appetite/food intake increased
- ✓ Anti-emesis/anti-nausea
- Reduction in intraocular pressure
- Bronchodilation

# Given that so many people smoke cannabis or ingest cannabis edibles, is it a safe drug?

# Concerns

- High THC content
- Adulterants and lack of accurate labeling
- Abuse potential
- Physical dependence (anxiety & irritability, impaired sleep, decreased appetite, cannabis craving, etc.)
- Impaired driving (e.g., increased automobile accidents)
- Panic reactions (emergency room visits)
- Associated with schizophrenia
- Impaired short-term memory
- Legal/socioeconomic hindrance

# Pharmacological Effects of Cannabinoids in Laboratory Animals

Increased heart rate Ataxia

Tetrad

- Decreased locomotion
- Analgesia
- Catalepsy
- Hypothermia
   Increased appetite
   Diminished muscle tone
   Discriminative cue
   Self-administration
   Memory disruption



#### Chemical constituents <u>Chemical classes</u> Cannabinoids (100+) Of cannabis

OH

THC

Nitrogenous cmpds (27) Amino acids(18) Proteins/ enzymes (11) Sugars (34) Hydrocarbons (50) Simple alcohols (7) Simple aldehydes (12) Simple ketones (13) Simple acids (21) Fatty acids (22) Simple esters/lactones (13) Steroids (11) Terpenes (20) Non-cannabinoid phenols (25) Flavoroids (21) Vitamins (1) Pigments (2) Elements (9) **Total known compounds** (483)

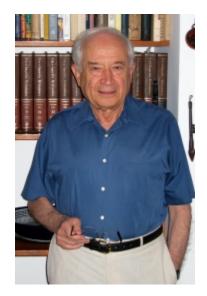
### Gaoni and Mechoulam (1964)\* Elucidated the Structure of THC

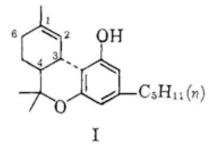
#### Isolation, Structure, and Partial Synthesis of an Active Constituent of Hashish<sup>1</sup>

Sir:

Hashish (marihuana), the psychotomimetically active resin of the female flowering tops of *Cannabis sativa* L. is one of the most widely used illicit narcotic drugs. A number of groups have reported the isolation of active constituents.<sup>2</sup> Most of these substances are not fully characterized, and comparisons with or between them are difficult.

We now wish to report the isolation of an active constituent of hashish to which we assign structure I ( $\Delta^1$ -3,4-*trans*-tetrahydrocannabinol).<sup>3</sup> This is the first active component whose constitution is fully elucidated.<sup>4</sup>





\*Journal of the American Chemical Society, 86:1646-47

### THC vs. Tetrahydrocannabinolic Acid (THCA)



- Cannabis produces THCA (THC precursor for THC)
- THCA does not produce psychoactive effects
- THCA is decarboxylated to THC upon drying and heating

### Cannabidiol (CBD) (Does not elicit cannabis-like effects)



Cannabidiol

#### Trial of Cannabidiol for Drug-Resistant Seizures in the Dravet Syndrome

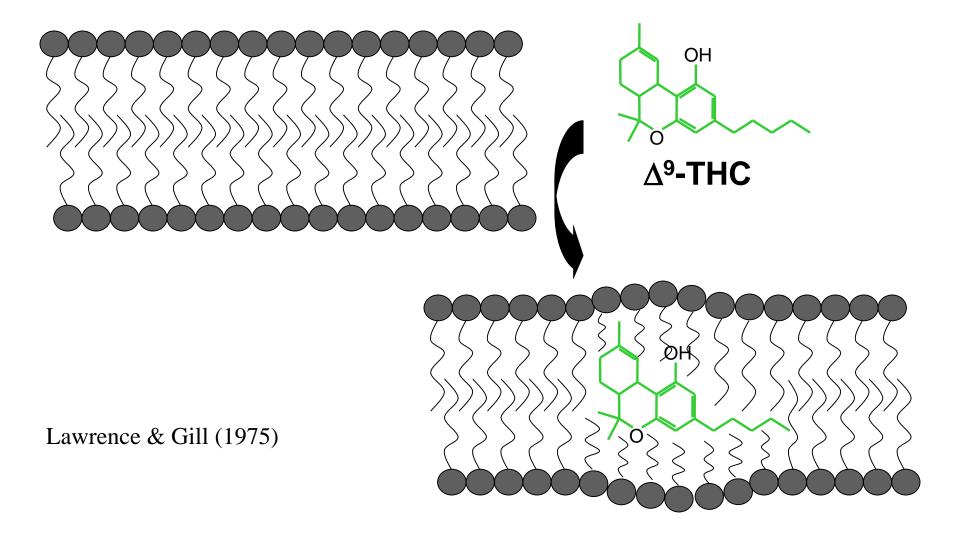
Orrin Devinsky, M.D., J. Helen Cross, Ph.D., F.R.C.P.C.H., Linda Laux, M.D., Eric Marsh, M.D., Ian Miller, M.D., Rima Nabbout, M.D., Ingrid E. Scheffer, M.B., B.S., Ph.D., Elizabeth A. Thiele, M.D., Ph.D., and Stephen Wright, M.D., for the Cannabidiol in Dravet Syndrome Study Group\*

#### Cannabidiol attenuates seizures and social deficits in a mouse model of Dravet syndrome

Joshua S. Kaplan, Nephi Stella, William A. Catterall, and Ruth E. Westenbroek

PNAS 2017 October, 114 (42) 11229-11234. https://doi.org/10.1073/pnas.1711351114

#### **Early Hypothesis: Membrane Perturbation**



# **Structure Activity Relationship**

- Unique effects
- Highly potent
- Structural requirements

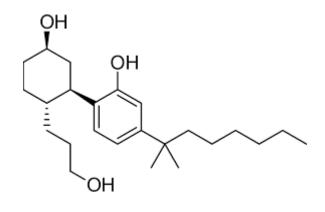
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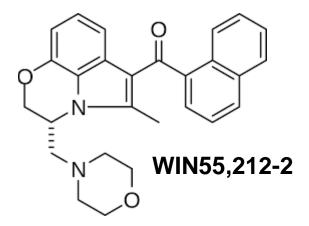
H

OH

CBD



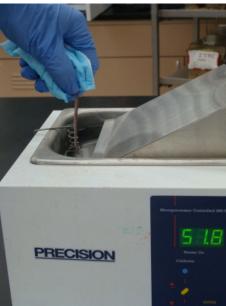
CP55,940



# In Vivo Screening of Cannabimimetic Activity

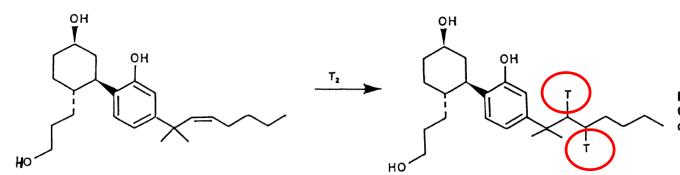
- Locomotor activity Mice are placed in activity chambers for 5 min.
   Distance traveled, time immobile, and speed are recorded
- Catalepsy (bar test) front paws are placed on a bar with hind paws on ground and time immobile is recorded
- Antinociception (tail withdrawal) tail is submerged in 52 degree Celsius water bath and time to flick tail out of water is recorded
- **Body temperature –** temperature is recorded from rectal thermometer





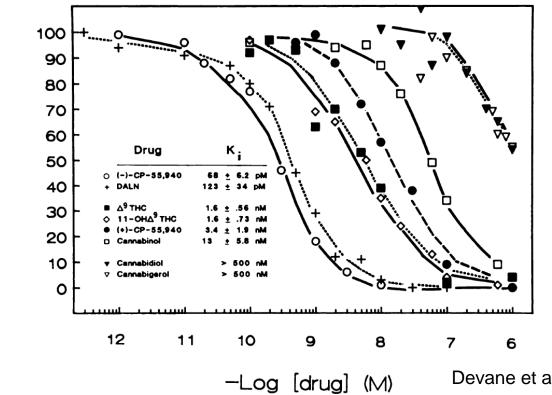


## **Specific binding site of THC in Brain Tissue**



**Fig. 1.** The synthesis of  $[^{3}H]$  CP-55,940 by the tritium reduction of compound 1.

Radiolabeled CP55,940



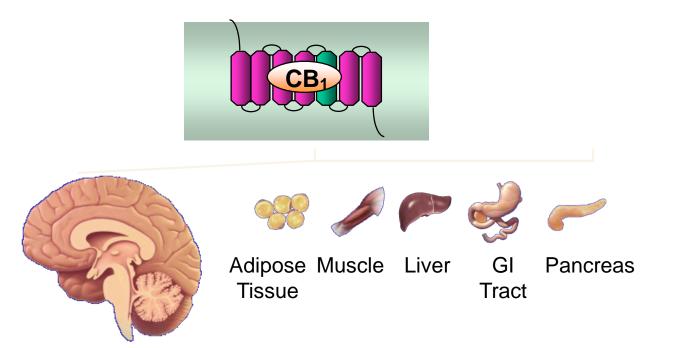
specific binding

ð

Percent

Devane et al (1988) Mol Pharmacol, 34:605-13

# **CB**<sub>1</sub> Receptors

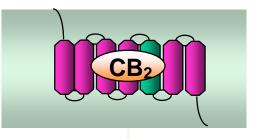


# Brain

#### Responsible for most CNS cannabis effects Also modulates many physiological functions

Devane et al. (1988) Mol Pharm, 34:605-613 Herkenham et al (1990) PNAS,87:1932-1936 Matsuda et al. (1990) Nature, 346: 561-4





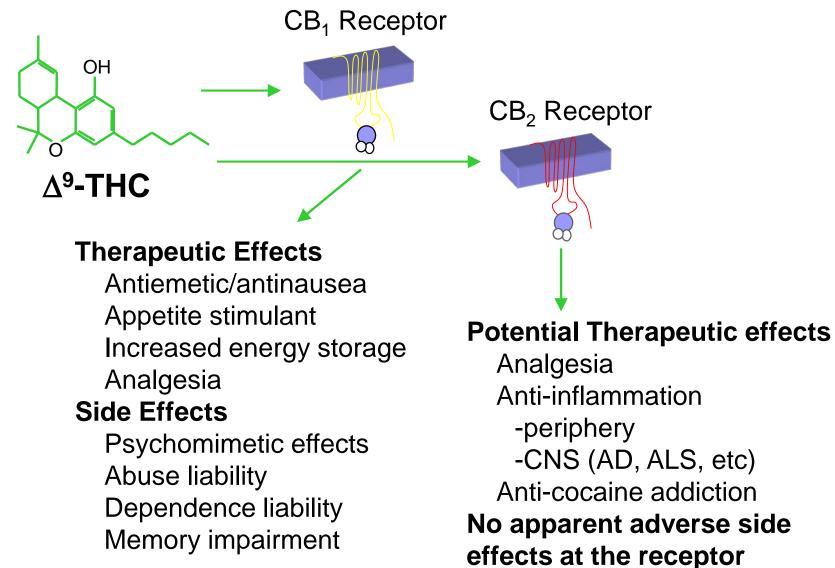
Immune System

T cells B cells Monocytes Spleen Tonsils

- Expressed primarily in immune cells
- Low expression in CNS, but increased upon microglial activation, neurons
- Agonists reduce nociception, inflammation, neurodegenerative states, and cocaine reward

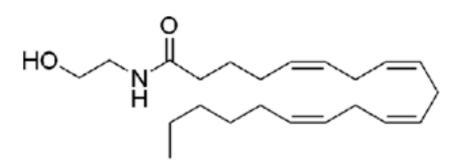
Munro S et al. *Nature*. 1993;365:61-65. Van Sickle MD et al. *Science*. 2005;310:329-332. Whiteside GT et al. *Curr Med Chem*. 2007;14:917-936.

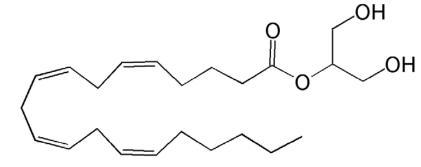
#### THC Produces Its Effects Through the Activation of Two Types of Cannabinoid Receptors



# What is the evolutionary benefit of cannabinoid receptors?

# Brain's Naturally Occurring Marijuana-like Chemicals (Endogenous Cannabinoids)





#### Anandamide (AEA)

- -1<sup>st</sup> isolated from porcine brain -Activates CB<sub>1</sub> & CB<sub>2</sub>
- -Partial CB<sub>1</sub> agonist
- -TRPV<sub>1</sub> receptor agonist -Short half-life
- -Energy regulation
- -Pathological states

Devane et al. (1992) Science, 258:1946-1949

#### 2-arachidonoylglycerol (2-AG)

-Abundant 1,000 fold>anandamide

- -Activates CB<sub>1</sub> & CB<sub>2</sub>
- -High efficacy CB<sub>1</sub> agonist
- -Short half-life
- -Retrograde signaling molecule modulating synaptic plasticity
- -Precursor for free arachidonic acid in brain

Mechoulam et al. (1995); Suigara et al. (1995) Nomura et al. 2011

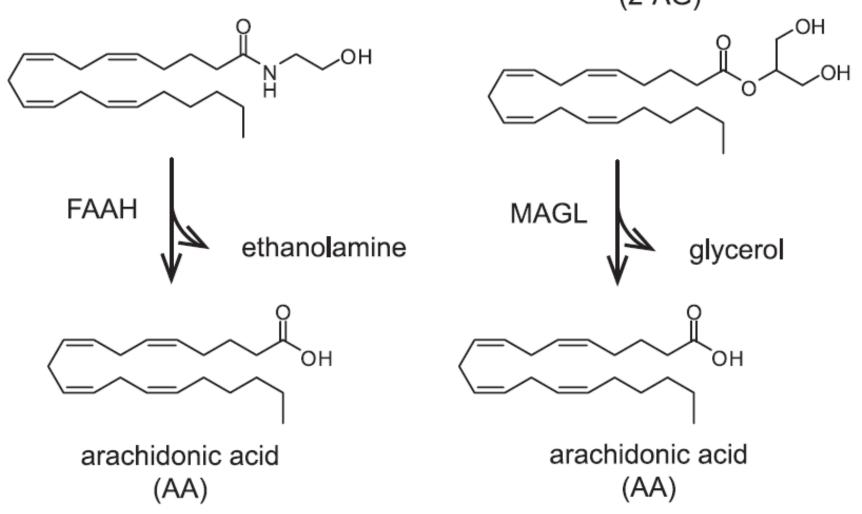
# Why aren't we high on our endocannabinoids all the time?



# Endocannabinoids are rapidly degraded by catabolic enzymes

anandamide

2-arachidonoylglycerol (2-AG)



# Fatty Acid Amide Hydrolase (FAAH) vs. Monoacylglycerol Lipase (MAGL)

## FAAH

- -Expressed on post-synaptic neurons
- -Major anandamide catabolic enzyme
- -Hydrolyzes other FAAs
  - -PEA (anti-inflammatory)
  - -OEA (anti-inflammatory)
  - -Oleamide (sleep-inducing)

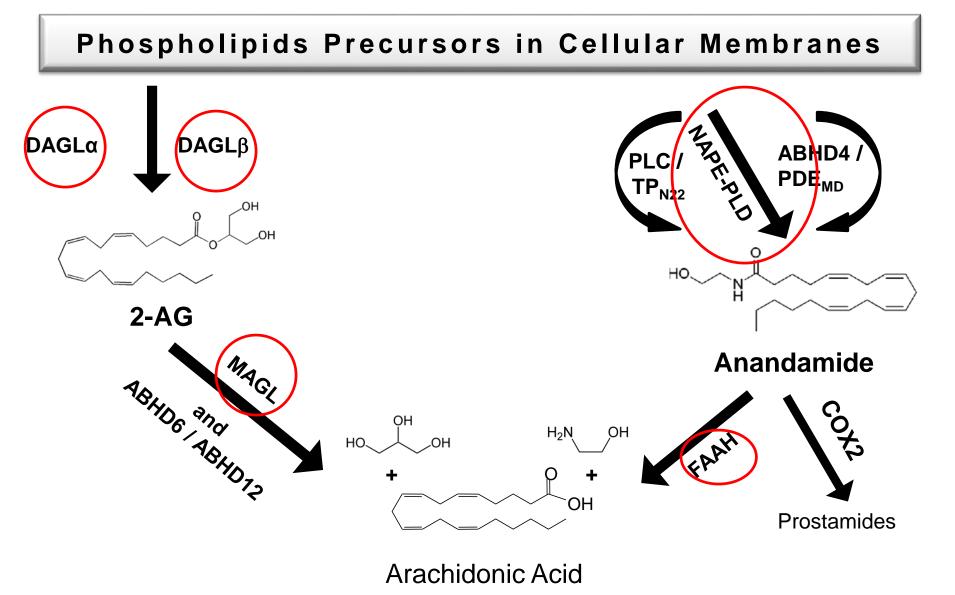
### MAGL

- Expressed on pre-synaptic neurons
- -Major 2-AG catabolic enzyme
- -Major biosynthetic enzyme of free arachidonic acid in brain

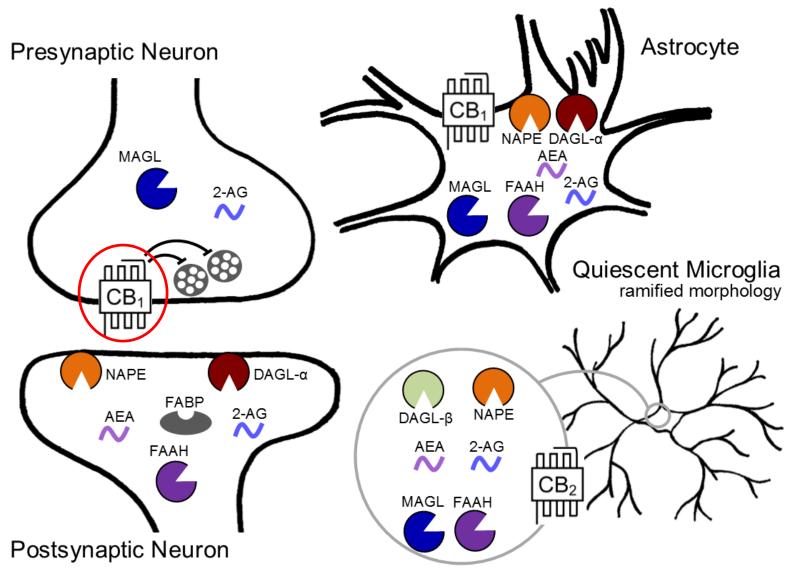
Karlsson et al. 1997; Dinh et al. 2002; Nomura et al. 2011

Cravatt et al. 1996; 2001

## eCBs Produced and Released on Demand and Regulated by Hydrolytic Enzymes



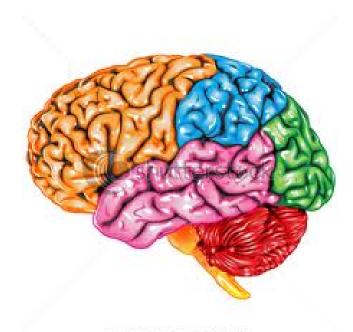
# Components of the Endocannabinoid System: Expressed on Cells in the CNS



Donvito et al. (2018) Neuropsychopharm, 43:52-79

# ....so how does cannabis produce its pharmacological effects in the brain?

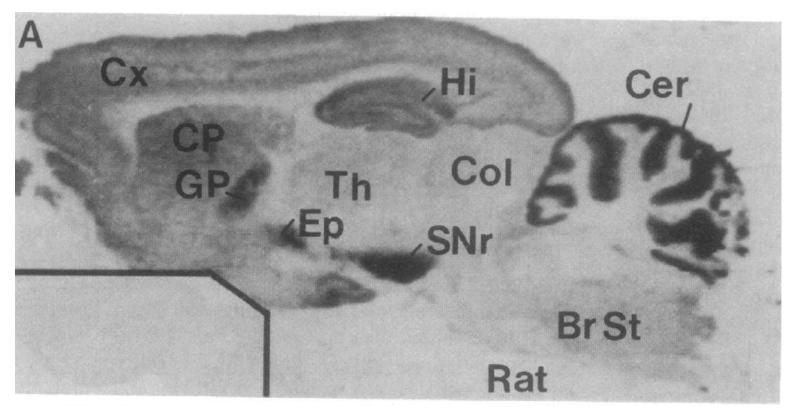




www.shutterstock.com - 60485137

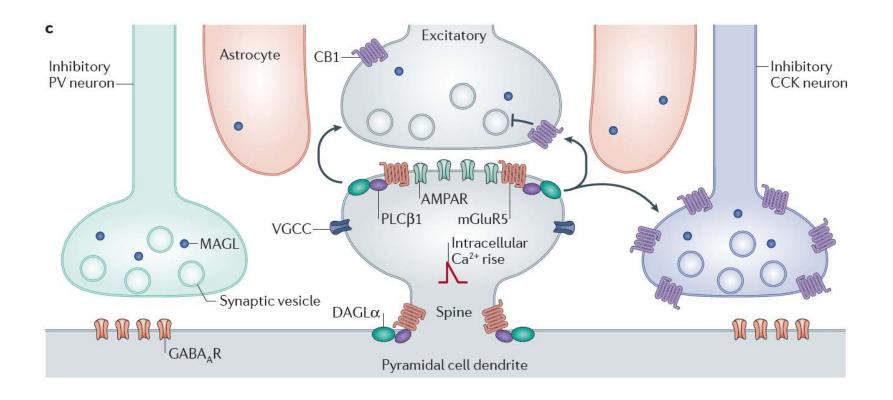
# ...so how does cannabis produce its pharmacological effects in the brain?

THC binds CB1 receptors heterogeneously expressed on brain regions known to mediate processes affected by cannabis



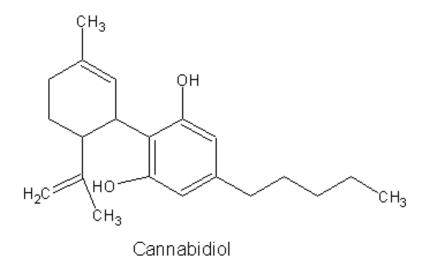
Herkenham et al (1990) Proc Natl Acad Sci, 871932-6

# THC Stimulates CB1 Receptors Expressed on Presynaptic Neurons Leads to Reduced Neurotransmitter Release

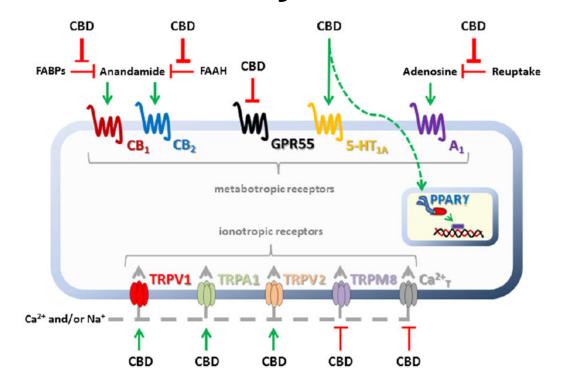


Soltesz et al. (2015) Nat Rev Neurosci.16:264-77

# What is/are the underlying mechanism(s) of action CBD?



# CBD does not activate cannabinoid receptors, but interacts with low potency at many sites



#### Figure 1

The main molecular targets and potential mechanisms of action of CBD. This drug inhibits both FAAH, the enzyme which metabolizes anandamide, and FABPs, which mediate the transport of anandamide to FAAH; both mechanisms ultimately result in the indirect activation of CB<sub>1</sub> and/or CB<sub>2</sub> receptors. CBD also activates the 5-HT<sub>1A</sub> receptor, PPAR<sub> $\gamma$ </sub> and the transient receptor potential channels TRPV1, TRPA1 and TRPV2. Finally, CBD inhibits adenosine reuptake and antagonizes GPR55, TRPM8 and T-type Ca<sup>2+</sup> channels. 5-HT<sub>1A</sub> and (indirect) cannabinoid receptor activation are the mechanisms that have been implicated in the anxiolytic effects of CBD to date (see Ibeas Bih *et al.* (2015) and McPartland *et al.* (2015) for further details).

Lee et al (2017) Br J Pharmacol. 174:3242-3256

# Endogenous Cannabinoid System: Modulates Multiple Physiological Processes

- Central Nervous system
- Peripheral nervous system
  - Dorsal root ganglia
  - Enteric nervous system
- Cardiovascular system
- Immune system
- Gastrointestinal system
- Renal system
- •Bone density

- Reward
- Synaptic plasticity
- Cognition
- Stress responses
- Sleep
- Energy Regulation
  - Feeding behavior
  - Lipogenesis
- Neuroexcitability/epilepsy
- Neuroinflammation
- Neurodegeneration
- Pain and Inflammation
- Olfaction
- Eicosanoids

## Endogenous Cannabinoid System Potential Therapeutic Targets

#### 1. CB<sub>1</sub> receptor

- a) Orthosteric site (active binding site): agonists and antagonists
- b) Allosteric site (alters confirmation binding site to increase or decrease activity): positive or negative allosteric modulators
- 2. CB<sub>2</sub> receptor: agonists

#### 3. Degradative enzymes

- a. FAAH (anandamide): inhibitors
- b. MAGL (2-AG): inhibitors

#### 4. Biosynthetic enzymes

- a. DAGL- $\alpha$  (2-AG: expressed on neurons and astrocytes) inhibitors
- b. DAGL- $\beta$  (2-AG: expressed on microglia and macrophages) inhibitors
- c. NAPE-PLD (anandamide) inhibitors

#### 5. Lipid trafficking molecules

a) fatty acid binding proteins

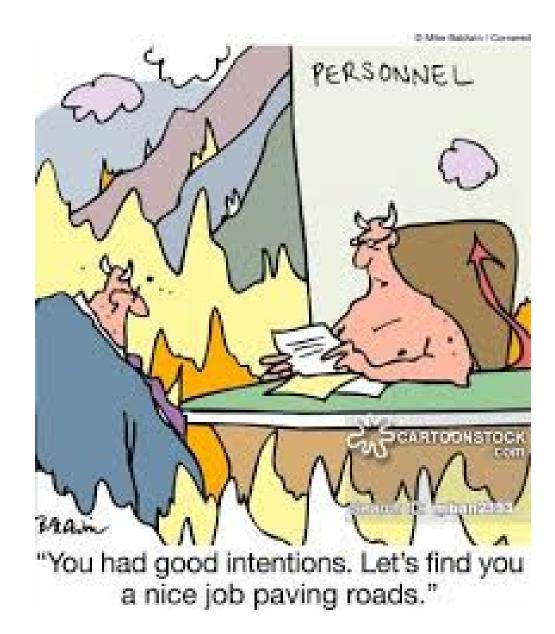
# **Potential Therapeutic Indications: eCB System**

- Cancer chemotherapy-induced nausea & emesis\*
- Appetite increase in AIDS\* and cancer patients
- Metabolic syndrome & weight loss (antagonists)
- Fluid regulation
- Pain and Inflammation
  - Rheumatoid arthritis
  - Spinal/Neuropathic
  - Cancer/chemotherapy
  - Migraine
  - NSAID-induced ulcers
- Pruritus (itching)
- Palliative (quality of life)

- Drug abuse disorders (e.g., cannabis, nicotine, opioids, cocaine, alcohol)
- Psychiatric diseases
  - Anxiety disorders
  - Posttraumatic Stress Disorder
  - Depression
- Brain Injury (e.g., stroke, trauma)
- ✓ Epilepsy\*
- Neurodegenerative diseases
  - Spasticity/multiple sclerosis
  - Huntington's disease
  - Parkinson's disease
  - Alzheimer's disease
  - Amyotrophic lateral sclerosis
- Cancer

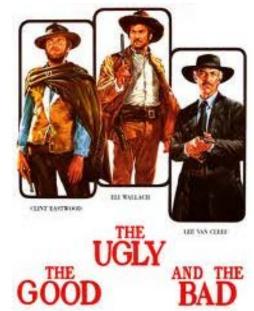
#### \*FDA approved cannabinoid-based medications

## The road to hell is paved with good intentions



# Unintended Consequence of Cannabinoid Research

- 1. Synthetic cannabinoids
  - a. Emerging drugs of abuse
  - b. Synthesized in clandestine labs based on scientific publications
  - c. Deleterious public health consequences
- 2. Response
  - a. Banning of synthetic cannabinoids
  - b. Emergence of new ligands



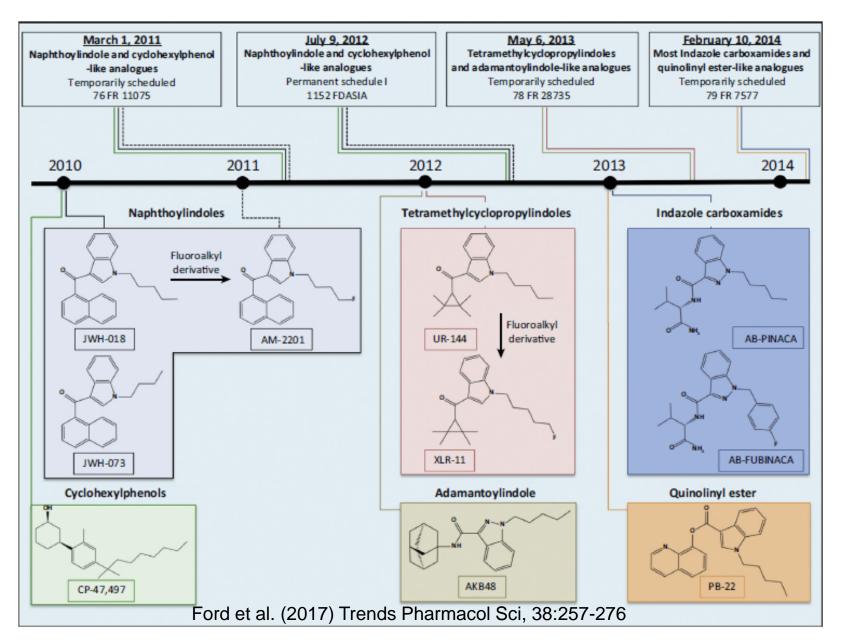
# What is Synthetic Marijuana?

- Synthetic cannabinoids originally developed as research tools and potential therapeutic agents
- Mimics the effects of THC
- Synthetic cannabinoids are added to herbal products
- Predominantly sold over the internet
- Many of these chemicals are LEGAL

# What is the appeal of synthetic cannabinoids?

- Produces marijuana-like effects
- Legal until recently
- Not readily detected in common drug screens
- Sophisticated marketing and shrewd branding

# **Rapidly Evolving Synthetic Cannabinoids**



# Comparative Adverse Neurological Effects I: Synthetic Cannabinoids vs. Cannabis

| Adverse effects and toxicities                           | Observed with K2/Spice products (SCBs) | Observed with marijuana (THC) | Refs       |
|----------------------------------------------------------|----------------------------------------|-------------------------------|------------|
| • Euphoria                                               | Common                                 | Common                        | [26,29,30] |
| <ul> <li>Appetite stimulation</li> </ul>                 | Common                                 | Common                        | [26,31]    |
| Nystagmus                                                | Reported                               | Reported                      | [32]       |
| <ul> <li>Slurred speech</li> </ul>                       | Reported                               | Reported                      | [33]       |
| Ataxia/lethargy                                          | Reported                               | Reported                      | [34]       |
| <ul> <li>Psychosis in susceptible individuals</li> </ul> | Extreme                                | Mild                          | [3,35]     |
| <ul> <li>Hypothermia</li> </ul>                          | Reported                               | None reported                 | [188]      |
| Hallucinations                                           | Common                                 | Rare                          | [3,36]     |
| Delusions                                                | Common                                 | Rare                          | [3]        |
| Confusion                                                | Common                                 | Rare                          | [33]       |

# Comparative Adverse Neurological Effects II: Synthetic Cannabinoids vs. Cannabis

| Adverse effects and toxicities              | Observed with K2/Spice products (SCBs) | Observed with<br>marijuana (THC) | Refs    |
|---------------------------------------------|----------------------------------------|----------------------------------|---------|
| Anxiety                                     | Common                                 | Rare                             | [37,38] |
| Panic attacks                               | Common                                 | Rare                             | [34]    |
| Agitation                                   | Common                                 | Rare                             | [3,34]  |
| Irritability                                | Common                                 | Rare                             | [39]    |
| Confusion                                   | Common                                 | Rare                             | [33]    |
| Memory disturbances                         | Reported                               | Common                           | [26]    |
| Self-mutilation                             | Reported                               | None reported                    | [40]    |
| Seizures                                    | Reported                               | None reported                    | [41]    |
| Catatonia                                   | Reported                               | Very rare                        | [42]    |
| <ul> <li>Acute cerebral ischemia</li> </ul> | Reported                               | None reported                    | [28]    |

# **Comparative Adverse Effects III: Synthetic Cannabinoids vs. Cannabis**

| Adverse effects and toxicities                   | Observed with K2/Spice products (SCBs) | Observed with<br>marijuana (THC) | Refs    |  |  |
|--------------------------------------------------|----------------------------------------|----------------------------------|---------|--|--|
| Renal                                            |                                        |                                  |         |  |  |
| Acute tubular necrosis                           | Reported                               | None reported                    | [47,48] |  |  |
| <ul> <li>Acute interstitial nephritis</li> </ul> | Reported                               | None reported                    | [48]    |  |  |
| Acute kidney failure                             | Reported                               | None reported                    | [49]    |  |  |
| Effects of chronic use                           |                                        |                                  |         |  |  |
| • Tolerance                                      | Common                                 | Common                           | [50,51] |  |  |
| <ul> <li>Marked withdrawal</li> </ul>            | Reported                               | Mild                             | [52]    |  |  |
| Dependence                                       | Reported                               | Rare                             | [51,52] |  |  |
| Deaths (between 2011 and 2014)                   | Over 20 deaths reported                | None reported                    | [53]    |  |  |

# Summary

#### 1. Endogenous cannabinoid system

#### a) Components

- i. Cannabinoid CB1 and CB2 receptors
- ii. Endogenous cannabinoids (anandamide and 2-AG)
- iii. Endocannabinoid regulating enzymes
- b) Modulates a multitude of physiological processes
- c) Target for FDA-approved medications and potential new drugs
- 2. Cannabis
  - a) THCA (THC precursor devoid of psychoactive activity)
  - b) THC (responsible for psychoactive effects): activates CB1 & CB2 receptors
  - c) CBD (lacks intoxicating actions): does not activate CB receptors
  - d) Contains 100+ other minor/trace cannabinoids and terpenoids
- 3. Synthetic cannabinoids
  - 1. Medicines and potential medicines
  - 2. Experimental tools
  - 3. Dangerous emerging drugs of abuse that represent a significant public health concern

# Conclusions

- The FDA approved constituents of cannabis (THC and CBD) in medicines
- The endocannabinoid system modulates many physiological systems and contains potential therapeutic targets
- Cannabis and synthetic cannabinoids can produce untoward side effects
- A great need exists for outcome-based research for cannabinoid-based medications

## Acknowledgements







# Medical Marijuana Dispensary Operations

Presented By: Al Domeika, R.Ph

Northeast Pharmacy Operations

Acreage Holdings, LLC

# LEARNING OBJECTIVES

- Outline the history of cannabis based medicine
- Discuss state and federal laws regarding the usage and dispensing of marijuana products.
- Overview Virginia's cannabis laws
- Discuss the role of the pharmacist in dispensing cannabis products, including:
  - Analyzing the pharmacology of the different components of the cannabis plant
  - Discussing drug interactions and safety concerns
  - Learning the different modes of delivery a patient may use cannabis
  - Picking appropriate dosing regimens

History

2900 B.C.

Chinese Emperor Fu Hsi references cannabis as a popular medicine





First recorded use in 2737 B.C. by Chinese emperor Shen-Nung

Effective in treating pain associated with rheumatoid arthritis and gout

## MA

Chinese word for cannabis

Earliest written reference to medical marijuana in Chinese Pharmacopeia (Rh-Ya)



National Institute on Drug Abuse (NIDA) Marijuana Research Findings: 1976,

Throughout ancient history, many writings suggest that cannabis was used to treat numerous diseases

Even the Bible suggests that cannabis was used in anointing oils.



1611: Jamestown settlers brought hemp to North America

Useful in making clothing, sails, and rope.

1762: Virginia government proposed incentives to manufacture products from hemp





George Washington known to have grown hemp at Mount Vernon Thomas Jefferson grew hemp at Monticello

Robert Deitch Hemp American History Revisited: The Plant with a Divided History, 2003

In 1850, marijuana was added to the U.S. Pharmacopoeia as a useful medicine for nausea, rheumatism and labor pains

Easily accessible in pharmacies and local stores





1906: President Theodore Roosevelt signs the Pure Food and Drug Act

> Required the labeling of all medicine, including cannabisbased products

1911: Massachusetts becomes 1<sup>st</sup> state to outlaw recreational cannabis

1913: Maine, Wyoming, Indiana follow

1914: New York City

1915: Utah, Vermont

1917: Colorado, Nevada

1917 – 1927: 10 other states pass marijuana prohibition laws



<u>Dale Gieringer, PhD</u> "The Forgotten Origins of Cannabis Prohibition in California," *Contemporary Drug Problems*, Summer 1999



- 1930's: Demand for cannabis based medications rise.
- Several pharmaceutical companies sold marijuana extracts as an analgesic, antispasmodic, and sedative.

1930: Harry J. Anslinger appointed Commissioner of Federal Bureau of Narcotics

Believed cannabis caused insanity and pushed people towards acts of criminality

In 1936, urged to put federal controls on cannabis.

By the end of 1936, all 48 states enacted laws to regulate marijuana

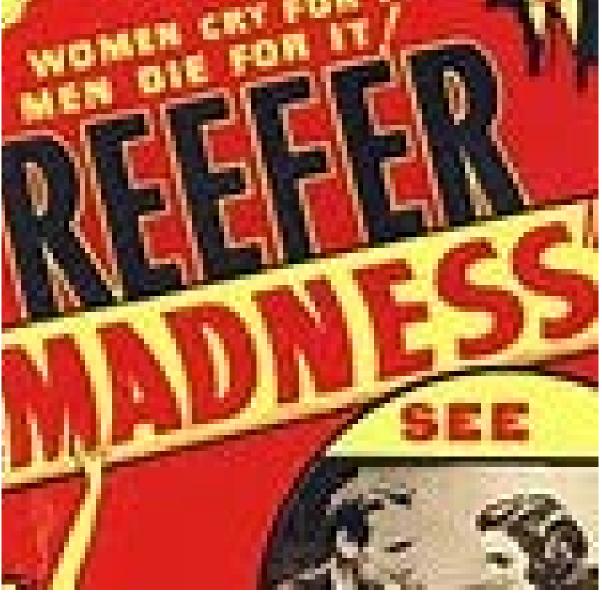


1936: Reefer Madness released

Describes marijuana as a drug that leads to people getting killed, committed to insane asylums

Originally titled *Tell Your Children,* financed by small church group

Purchased by a producer of exploitation films, edited and changed title to *Reefer Madness* 



#### **MARIJUANA TAX ACT OF 1937**

Imposed registration and reporting requirements and imposed large tax on growers, sellers, and buyers

American Medical Association opposed bill

Required physicians and pharmacists to register with federal authorities and pay an annual tax or license fee

Prescriptions of marijuana products reduced



October 2<sup>nd</sup>, 1937

1<sup>st</sup> day Marijuana Tax Stamp Act was enacted

Samuel R. Caldwell: 1<sup>st</sup> marijuana seller arrested and convicted under U.S. Federal Law

Sentencing: \$1000 fine 4 years hard labor in Leavenworth

National Organization for the Reform of Marijuana Laws (NORML) "The First Pot POW," norml.org

#### 1942

Cannabis removed from US Pharmacopeia

Lost any sort of medicinal legitimacy

#### ARTICLES OFFICIAL IN THE U.S. P. XI BUT N ADMITTED TO THE U.S. P. XII

Acetum Scilla Acidum Aceticum Dilutum Acidum Acetyltannicum Acidum Sulfuricum Aromaticum Aconitum Acriflavina Acriflavinæ Hydrochloridum Æthylhydrocupreinæ Hydrochloridum Albumini Tannas Ammonii Benzoas Ammonii Bromidum Ammonii Salicylas Arseni Trijodidum Asafœtida **Bismuthi Subgallas** Calcii Bromidum Calcii Creosotas Cannabis Cantharis

Liquor Sodii Hypochloritis Dilutus Magma Ferri Hydroxidi Massa Hydrargyri Merbaphenum Mistura Opii et Glycyrrhize Comp **Oleum Maydis** Oleum Santali Paraffinum Paraffinum Chlorinatum Pepsinum Pilulæ Aloes Podophyllum Potassii Chloras Pulvis Ipecacuanhæ et Opii Pulvis Sennæ Compositus Pyrogallol Quinina Resina Podophylli Santoninum

#### 1956

Congress includes marijuana in the Narcotics Control Act of 1956

> Imposed stricter penalties and mandatory sentences for drug related offenses.

lawbrain.com/wiki/Narcotics\_Acts



1968

University of Mississippi becomes official grower of marijuana for the Federal Government

Cultivates cannabis for government use and research studies

Researchers must be approved by the DEA and a representative from NIDA



University of Mississippi, Oxford, Mo

https://technical420.com/cannabis-article/university-mississippi-sole-provider-marijuana-medical-research-us

The Controlled Substance Act of 1970 classified marijuana as a Schedule I drug

> Made it illegal to possess, use, buy, sell, and grow marijuana



1985

Marinol approved by FDA

Originally approved for nausea and vomiting associated with cancer chemotherapy

Placed as a Schedule II drug

Later approved (1992) for anorexia in patients with AIDS

Rescheduled to a Schedule III drug in 1999





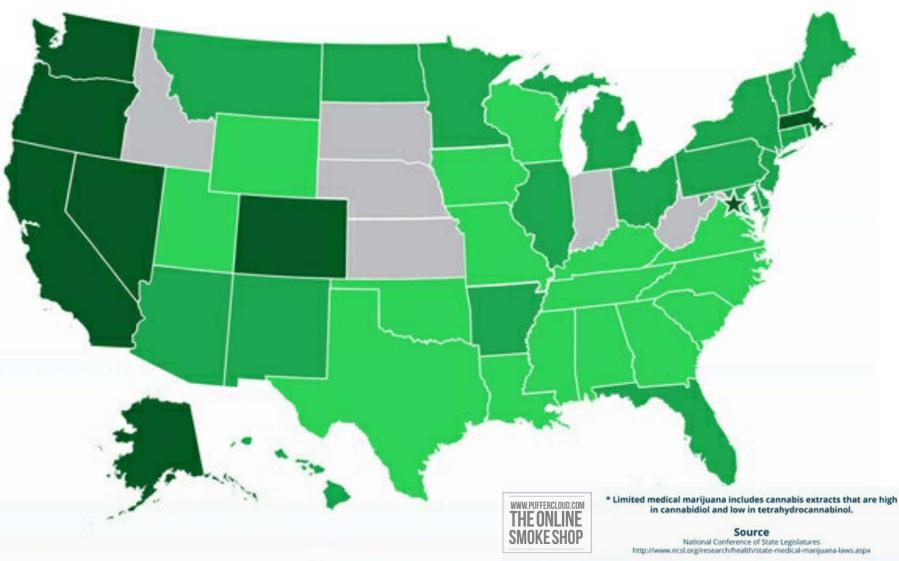
In 1996, California became the first state to allow medical marijuana for patients with a valid doctor's recommendation.

Other states followed...

# CALIFORNIA

en.wikipedia.org/wiki/California\_Proposition\_215 (1996)

## Marijuana Legalization by State



#### **Recreational Marijuana**

Alaska California Colorado Massachusetts Nevada Oregon Washington Washington, D.C.

#### **Medical Marijuana**

Arizona Arkansas Connecticut Delaware Florida Hawaii Illinois Maine Maryland Michigan Minnesota

Montana **New Hampshire** New Jersey New Mexico New York North Dakota Ohio Pennsylvania **Rhode Island** Vermont

#### Limited Medical Marijuana\*

Alabama Georgia lowa Kentucky Louisiana Mississippi Missouri North Carolina South Carolina Tennessee

Texas Utah Virginia Wisconsin Wyoming

# FEDERAL LAWS

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## FEDERAL LAW

### Cannabis still federally illegal

Within the White House, many differences in opinion

## Cole Memo

Adopted in 2013, urged federal prosecutors to not use resources to prosecute people and businesses who are compliant with their state's marijuana laws Federal prosecutors should shift their focus on:

- Distribution of marijuana to minors;
- Preventing revenue from the sale of marijuana to criminal enterprises
- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- Preventing state-authorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity;
- Preventing violence and the use of firearms in the cultivation and distribution of marijuana;
- Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana;
- Preventing the growing of marijuana on public lands; and
- Preventing marijuana possession or use on federal property.

#### Jeff Sessions rescinded this memo on January 4<sup>th</sup>, 2018





#### **ROHRABACHER-FARR AMENDMENT**

- Prohibits Justice Department from using funds to be used to prevent states from implementing medical cannabis laws
- Ends federal medical marijuana raids, arrests, criminal prosecutions, and civil asset forfeiture lawsuits
- Provides current medical cannabis prisoners a way to petition their release
- Current version expires on September 30<sup>th</sup>, 2019 (must be renewed annually each fiscal year.

Jeff Sessions sent a letter to Congress asking legislators to deny recertification





## William Barr

- "Untenable"
- Pledged not to enforce federal marijuana policies against states that are compliant under the Cole Memo guidelines.
- Supports Federal regulation
- Does not support Federal legalization.



## CONNECTICUT MARIJUANA LAWS



- Changed classification from a Schedule I drug to a Schedule II drug.
- Only pharmacy technicians that have had an active Connecticut pharmacy technician license within 5 years may apply for a dispensary technician license and sell marijuana product.
- Only pharmacists may apply for a dispensary license and dispense marijuana product.

### STATES THAT UTILIZE PHARMACISTS TO DISPENSE CANNABIS



### VIRGINIA LAWS AND PENALTIES

| Offense                                       | Penalty     | Incarceration     | Max. Fine   |
|-----------------------------------------------|-------------|-------------------|-------------|
| Possession                                    |             |                   |             |
| Less than 1/2 oz. (first offense)             | Misdemeanor | 30 days           | \$500       |
| Less than 1/2 oz. (subsequent offenses)       | Misdemeanor | 1 year            | \$2500      |
| Sale/Manufacture/Trafficking                  |             |                   |             |
| ½ ounce to 5 pounds                           | Felony      | 1* to 10 years    | \$2500      |
| 5 pounds to 100 kg                            | Felony      | 5* to 30 years    | \$1000      |
| More than 100 kg                              | Felony      | 20* years to life | \$100,000   |
| To a minor who is at least 3 years younger    | Felony      | 2* to 50 years    | \$100,000   |
| Within 1000 feet of school or school bus stop | Felony      | 1* to 5 years     | \$100,000   |
| Manufacture of marijuana                      | Felony      | 5* to 30 years    | \$10,000    |
| Transporting more than 5 lb into the state    | Felony      | 5* to 40 years    | \$1,000,000 |



Year Passed 2015

Statute

2) Va. Code. Ann. § 3.2-4112 (2015)

Summary

3

Senate Bill 955 allows for the cultivation of industrial hemp by licensed growers of industrial
hemp as part of a university-managed research program. The Department of Agriculture and
Consumer Services is in charge of regulating and establishing industrial hemp research
programs by public institutions of higher education.



Law Signed

1) 2015

3



) Intractable Epilepsy

Summary

- Gives protection to those who are in possession of cannabidiol oil or THC-A oil (contains at least 15% of CBD or THC-A and less than 5% of THC)
  - Must have a written valid certification issued from a practitioner in the realm of practice to treat epilepsy
  - No current dispensaries, but in 2016, legislation was passed to establish regulations for the manufacturing of therapeutic oils containing CBD and/or THC-A.



Law Signed

2018

3

Qualifying Condition
Any Condition

Summary

- HB 1251 & SB 726
- Bills to expand certifications to include "any diagnosed condition or disease determined by the practitioner to benefit from such use."
- HB 1251 also increases supply of CBD oil or THC-A oil a processor may dispense from a 30 day supply to a 90 day supply



Summary

- Only oils permitted, not whole plant cannabis
- Must contain at least 15% of either CBD or THC-A, and no more than 5% THC
- "Written Certification" must be provided by physician, available online from the Department of Health Professions
  - Any physician licensed to practice medicine or osteopathy in Virginia
  - Practitioners must register with the Board of Pharmacy
  - Only be permitted to issue a set number of certifications
- Patients, parents/legal guardians apply through the Board of Pharmacy
  - \$50 application fee
  - Certifications are good for 1 year



Summary



#### **Pharmaceutical Processors**

- Responsible for cultivating, manufacturing and dispensing
- Pharmacist must be in charge of each facility
- Cannabis oils cannot be sold in pharmacies
- Conditional approval for 5 initial pharmaceutical processors, one for each health service area
  - Pharmacann (Health Service Area I)
  - Dalitso (Health Service Area II)
  - Dharma (Health Service Area III)
  - Green Leaf (Health Service Area IV)
  - Columbia Care (Health Service Area V)

The Dispensary Pharmacist



Component Analysis

## CANNABINOIDS

Group of chemical compounds that interact with the endocannabinoid system

#### THE ENDOCANNABINOID SYSTEM

System of the body that controls many body functions Memory Mood Sleep Appetite Pain Immune response

Affects physiological responses Circulation Energy metabolism Organ function

#### **CANNABINOID RECEPTORS**

#### **CB1** Receptors

Primarily present in the brain and spinal cord

Found in areas concerned with movement, postural control, pain, memory, cognition, and emotion

Also found in appetite controlling areas like the hypothalamus

Are NOT present in cardiopulmonary centers in the brain

### CB2 Receptors

Expressed primarily in immune tissues

Can mediate regulation of cytokine release from immune cells

May modulate clinical conditions such as inflammatory pain, post-operative pain, chronic pain

# **ENDOCANNABINOID SYSTEM**

1083

#### THE HUMAN ENDOCAMMABINDID SYSTEM

(30). One and that is the a lock and key pice exciting homen receptors. These receptors are part of the indocurrentened speaks which impact physicalitys algencesses affecting part readulators, memory and appetite plot and inflatorizing effect and other instruces spheric impression. The indocurrent-risk system completes two type of readplates. (B) and CRL which we is diplect for the system in furnal begin and well being.



CBD track late affairty for CB Car CB 2 tracky have built has presented interest affairty and having student RECEPTORS ME FOUND

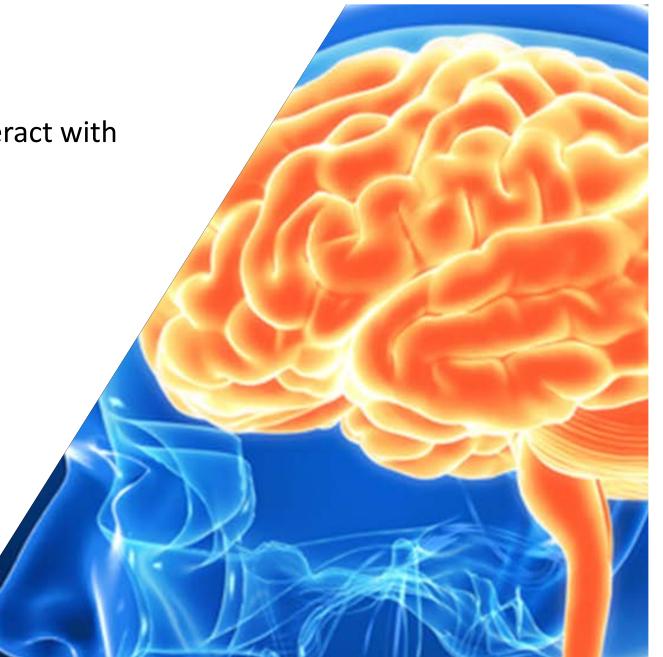
OR CR & SURFACES



The recent identification of cannabinoid receptors has triggered an exponential growth of studies exploring the endocannabinoid system and its regulatory functions in health and disease. This system has been implicated in a growing number of physiological functions, both in the central and peripheral nervous systems and in peripheral organs.

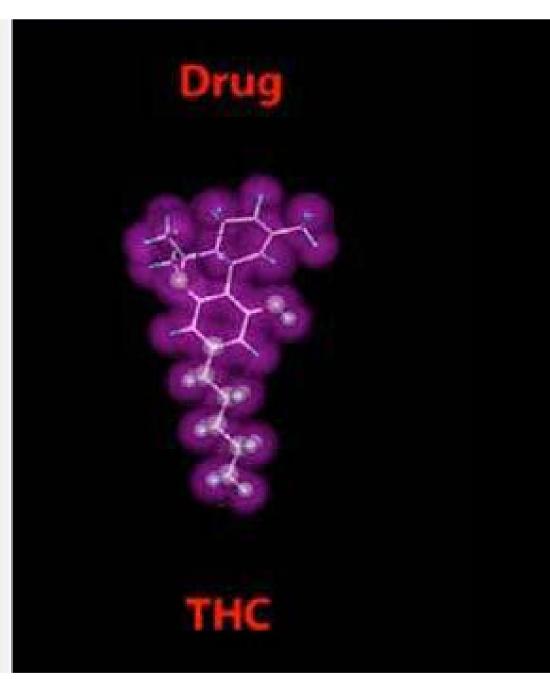
# CANNABINOIDS

- Group of chemical compounds that interact with the endocannabinoid system
- Found naturally in the body, called endocannabinoids
  - Anandamide
  - 2-Arachidonoylglycerol (2-AG)



## **Brain's Chemical**

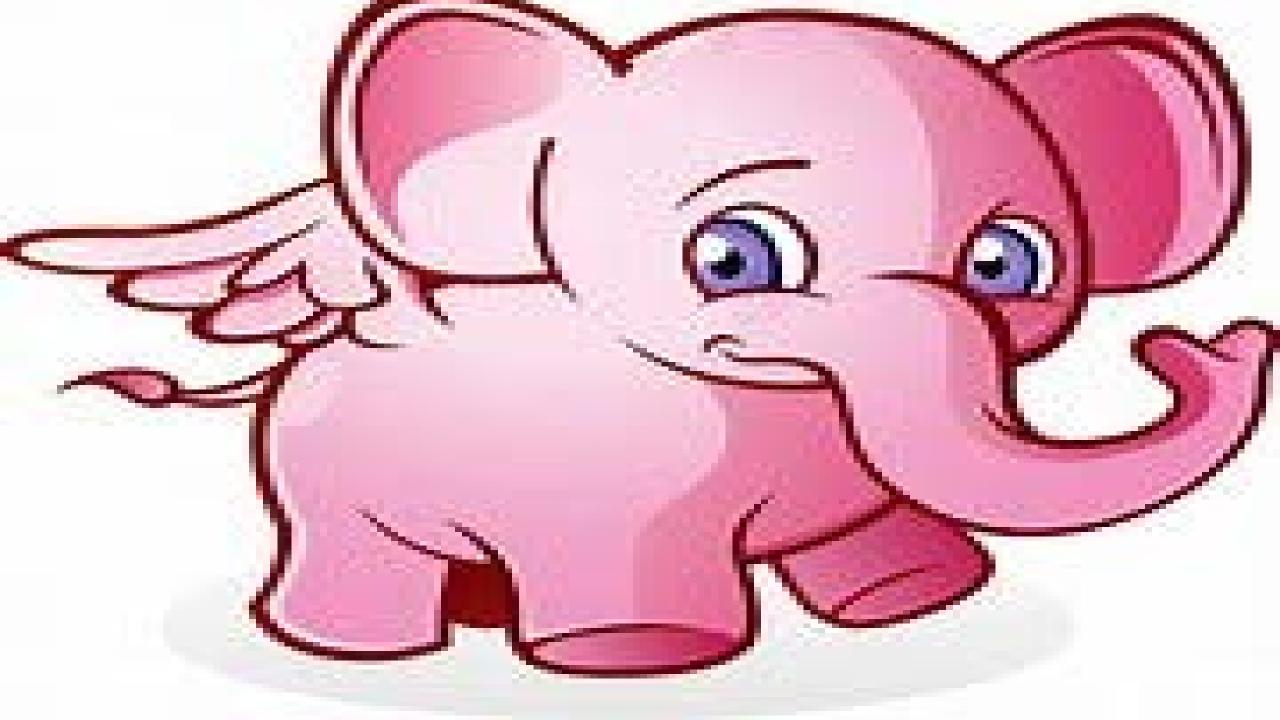
## Anandamide



## CANNABINOIDS

- Found in high concentrations in cannabis (phytocannabinoids)
- Each cannabinoid may have its own or shared therapeutic benefit



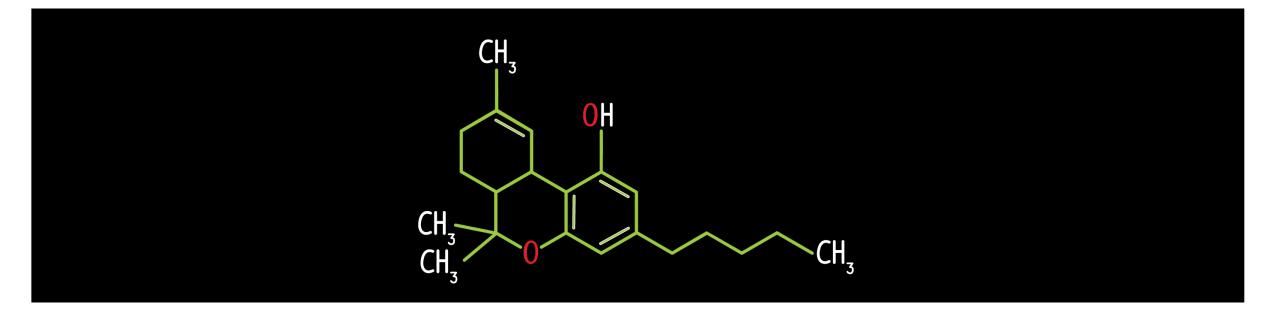


### CANNABINOIDS

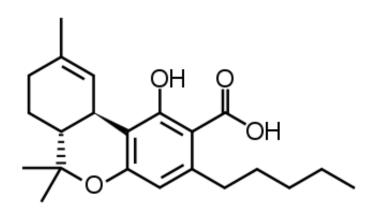
THC (d-9 Tetrahydrocannabinol)

- Known for being strongly psychoactive
- Stimulates endocannabinoid system by binding to CB1 and CB2 receptors
- Health Benefits
  - > Analgesic
  - > Sleep
  - > Antidepressant
  - > Antispasmodic
  - > Antiemetic
  - > Appetite stimulant

- > Antioxidant
- > Reduces intraocular
  - eye pressure

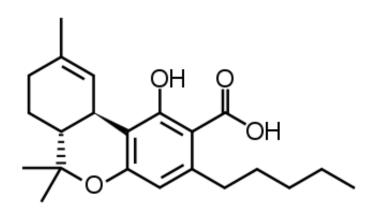


## Tetrahydrocannabinolic Acid (THC-A)



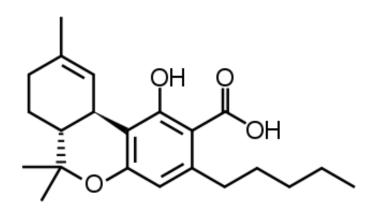
- Acid precursor to THC
- Non-intoxicating cannabinoid found in raw and live cannabis
- THCA will convert to active THC as plant dries or heat is applied → Decarboxylation

## Tetrahydrocannabinolic Acid (THC-A)



- Affects 4 functions of the endocannabinoid system
  - Releases COX-1
  - Inhibits COX-2
  - Inhibits TNF-Alpha
  - Releases Interleuken-10
- Wider spectrum of effects than THC and CBD

## Tetrahydrocannabinolic Acid (THC-A)



- Modulates:
  - Autonomic nervous system
  - Auto-immune system
  - Microcirculation
- Anti-inflammatory, Anti-convulsant, Antispasmodic, and Anti-oxidant properties
- Aniproliferative?

## CBD (Cannabidiol)

- Does not bind directly to CB1 or CB2 receptors
- Stimulates activity in both receptors
  - > Causes increased release in 2-AG
  - > Inhibits activity of fatty acid amide hydroxylase (FAAH) which slows deterioration of anandamide

HO

- Inhibits THC's effects on CB1 receptors
- Binds directly to G-protein coupled receptor : TRPV-1
- Activates 5-HT1A serotonin receptor
- Affinity to histamine receptors
- Found to inhibit ID-1 gene

## CBD (Cannabidiol)

- Non-psychoactive
- Suppresses psychoactivity of THC
- Ideal for elderly, children and patients that prefer to remain clear-headed

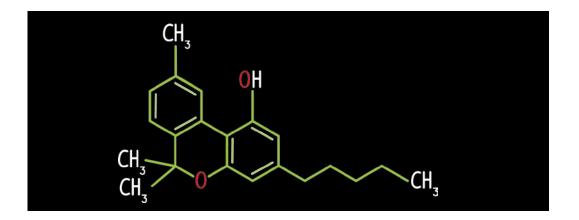
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HO

- Extremely valuable in treating seizure disorders
- Often as effective as THC in pain management
- Calming effect
- Can provide a focusing effect

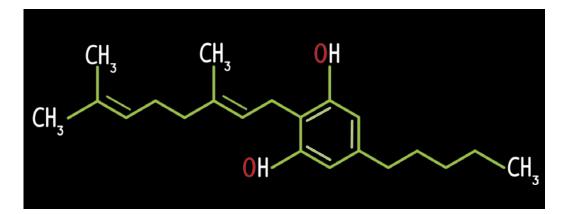
Cannabis Pharmacy (2014); 34-41 Michael Backes

### CANNABINOIDS



#### **CBN (Cannabinol)**

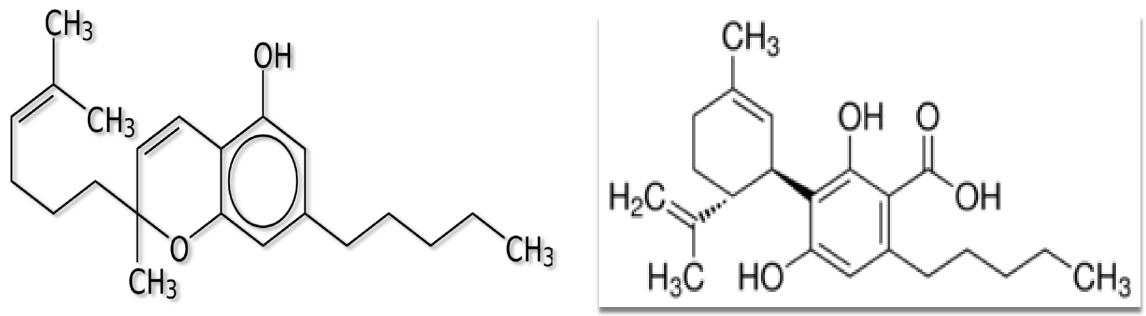
- Oxidation process of THC
- Partial agonist of CB2 receptors and weak agonist of CB1 receptors
- Strongly sedative
- Useful in treatment of insomnia



#### **CBG (Cannabigerol)**

- Non-psychoactive
- Inhibits uptake of GABA decreases anxiety and muscle tension
- Anti-inflammatory

## CANNABINOIDS



CBC

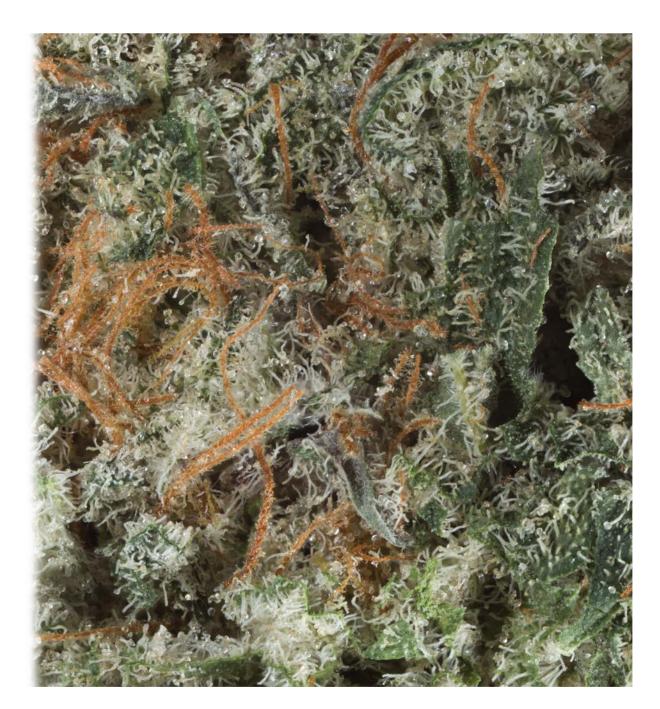
- Non-psychoactive
- Inflammation, Pain, Anxiety, Stress

#### **CBD-A**

- Acid precursor to CBD
- Anti-inflammatory, Digestive aid

#### Terpenes

- Organic hydrocarbons found in the essential oils in plants that give cannabis it's aroma
- Contained in many familiar plants found in the natural world
- Every strain has a unique terpene profile
- Works in synergy with cannabinoids (entourage effect)
- Contain separate therapeutic effects





Also found in: pine needles, rosemary, basil, dill

*Medicinal value:* bronchodilator, antiseptic, anti-inflammatory

http://steephilllab.com/terpenes-and-cannabis/

## Myrcene

Aroma: Musky, Earthy

Also found in: Mango, Thyme, Hops

*Effects:* Relaxing, Sedating, "Couch-lock"

*Medical value:* Anti-oxidant, Muscle tension, Pain, Inflammation, Depression, Sleep

Allows THC to take effect more quickly by allowing it to cross the blood-brain barrier more easily





### Limonene

Aroma: Citrus

*Also found in:* Fruit rinds, Rosemary, Peppermint

Medicinal value: Anti-fungal, Heartburn, GI complications, Depression, Anxiolytic

http://steephilllab.com/terpenes-and-cannabis/

## Caryophyllene

Aroma: Peppery, Spicy

Also found in: Black pepper, Basil, Cloves, Cotton

*Medical value:* Gastro-protective, Anti-inflammatory, Pain relief

May selectively activate CB2 receptors

http://steephillab.com/terpenes-and-cannabis/



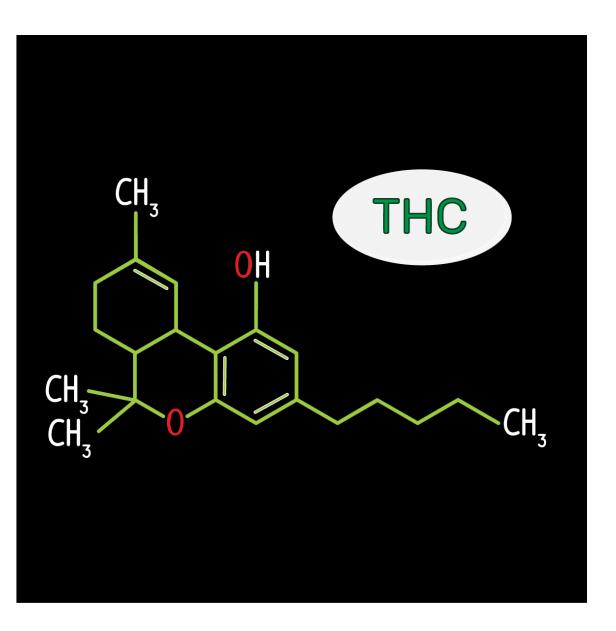


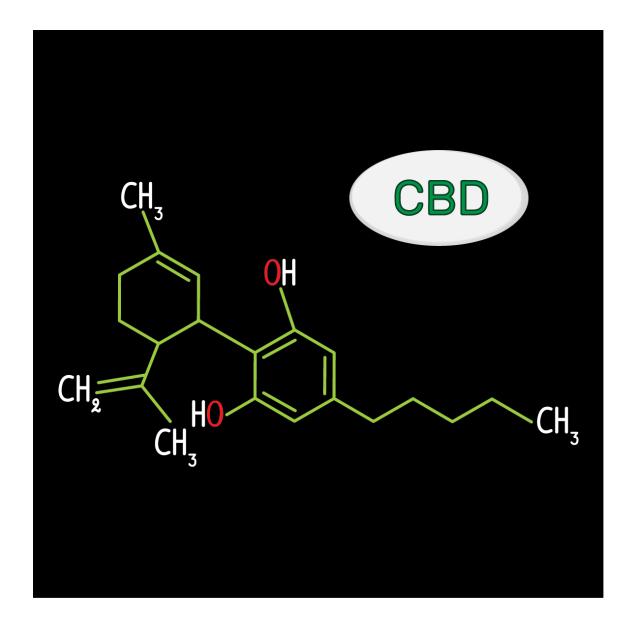
Also found in: Lavender, Spring Flowers, Rosewood

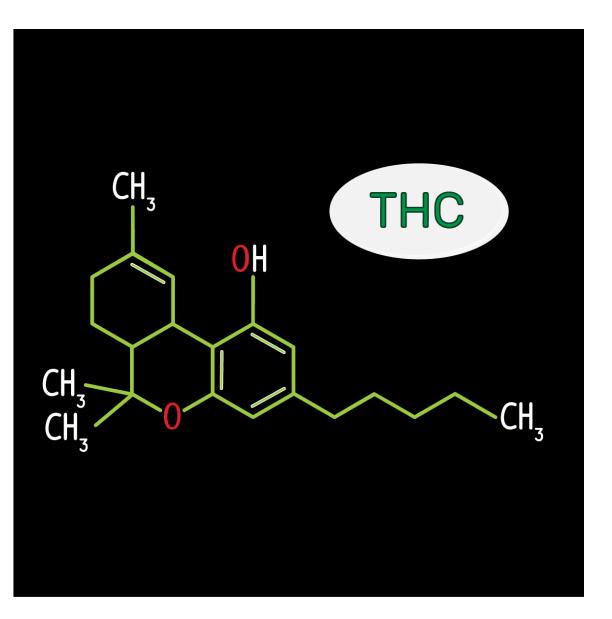
> Medicinal value: Calming Effect, Anti-Anxiety, Sedative Effect, Analgesic, Anti-Epileptic

> > http://steephilllab.com/terpenes-and-cannabis/





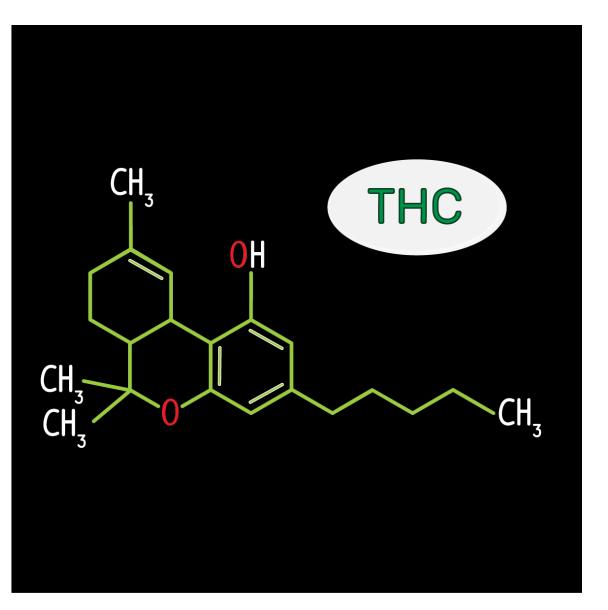




# THC metabolized by CYP2C9 and CYP3A4 enzymes

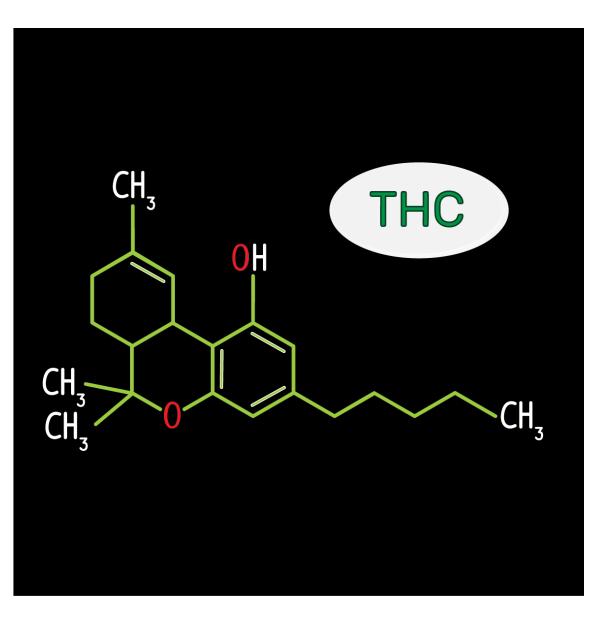
- Medications that may be increased by THC administration: Amiodarone, Atorvastatin, Carvedilol, Metoprolol, Ritonavir, Simvastatin, Verapamil
- Clopidogrel effects may be decreased
- Amiodarone, Metronidazole, Fluoxetine, Fluconazole may inhibit THC elimination
- Ketoconazole has been shown to increase peak concentrations of THC
- Poor metabolizers of CYP2C9 can have THC concentrations increase three-fold

http://www.pharmacytimes.com/publications/issue/2014/December2014/Drug-Interactions-with-Marijuana



#### THC may also induce CYP1A2 enzyme

- Smoked cannabis has been shown to increase the metabolism of theophylline and chlorpromazine
- 50% decrease in plasma concentrations
- Induction seems to be occur in smoked marijuana, not oral administration, and is dose specific



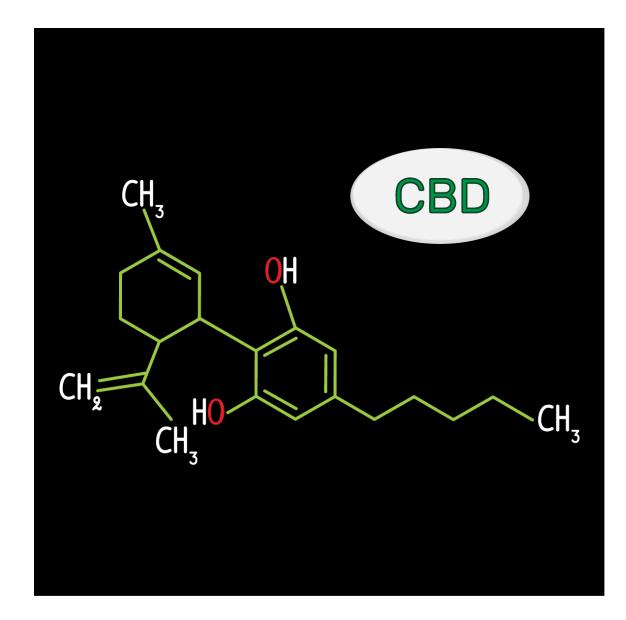
#### THC strongly binds to blood plasma proteins

- Caution patients on warfarin
- One study has shown an increased response with a patient smoking 4 to 5 marijuana cigarettes per week

http://www.pharmacytimes.com/publications/issue/2014/December2014/Drug-Interactions-with-Marijuana

# CBD is a substrate of CYP3A4 and CYP2C19 enzymes

- Medications that may have an increased effect
  - Amitriptyline
  - Clobazam
  - Diazepam
  - Propranolol
  - ✤ Warfarin



http://www.pharmacytimes.com/publications/issue/2014/December2014/Drug-Interactions-with-Marijuana

# Pharmacodynamic interactions should be expected between marijuana and:

- Drugs with sympathomimetic activity (tachycardia, hypertension)
- Central nervous system depressants (drowsiness, ataxia), and
- Drugs with anticholinergic effects (tachycardia, drowsiness).

Cannabis medicines (smoked, oral, sublingual, or vaporized) may increase effects of:

- Alcohol
- Benzodiazepines
- Opiates

#### The Pharmacist's Role



#### **Prescription Monitoring Program (PMP)**

- Controlled substances as well as marijuana card activation and marijuana purchases will show up on the report
- Physicians can monitor patient's usage.
- Before dispensing any marijuana product, the pharmacist checks the PMP.
  - Double check to make sure patients remain with one dispensary and are not over their monthly limit
  - Review any new controlled medications that may have been added since last visit and counsel if appropriate

# COUNSELING





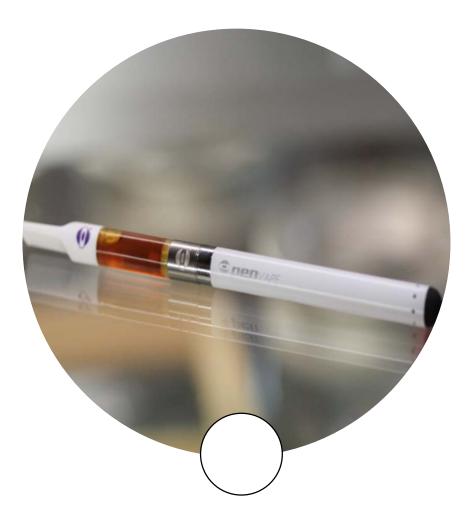




# DOSAGE FORMS

## INHALANTS



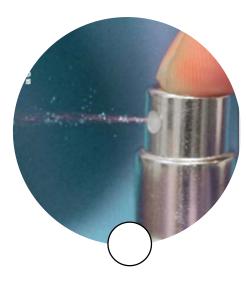


# INHALANTS

- ✓ Fast-acting; produces an effect within 5 minutes.
- ✓ Effects last for approximately 2 hours.
- $\checkmark$  Easy to titrate dose.
- $\checkmark$  Can cause throat irritation.
- ✓ Hard to determine dosage.
- ✓ Appropriate for patients who need instant relief and to minimize side effects.

### Sublinguals







Tinctures

**Sprays** 

**Dissolvable Strips** 

# SUBLINGUALS

- ✓ Under the tongue application.
- ✓ Delayed action (takes approximately 30 minutes before effect).
- ✓ Longer duration of action (three to four hours).
- ✓ Specific dosing.
- ✓ Beware of added ingredients (alcohol, coconut oil)
- ✓ Appropriate for those individuals who need quick relief who cannot inhale cannabis.

### Consumables





**Edibles** 

Capsules



Oils

## CONSUMABLES

- ✓ Effects delayed (30 minutes to 2 hours).
- ✓ Effects can last anywhere from 4 to 8 hours.
- ✓ Effects are much stronger.
- ✓ Specific dosing.
- ✓ Beware of added ingredients (food additives, coconut oil)
- ✓ Bioavailability can range from 10-20%
- ✓ Appropriate for those patients who need long term relief.

# Other Routes of Administration







# DOSING

- Ask about marijuana experience
- Focus on symptoms
- Fit cannabis therapy in a patient's lifestyle compliance
- Start low and slow
- Gradually increase dose every 3-5 days
- Note adverse effects as well as symptom relief
- Individualized medicine different doses for different patients



#### PRODUCT A – VAPE OIL



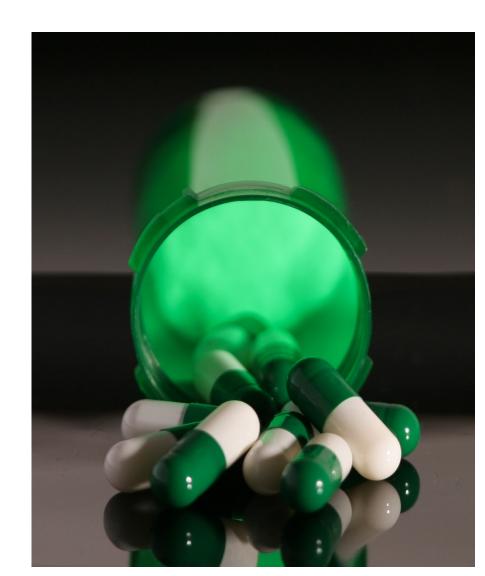
| CANNABINOID CONTENT |        |  |
|---------------------|--------|--|
| THC-A               | <0.10% |  |
| ТНС                 | 2.57%  |  |
| CBD-A               | 2.81%  |  |
| CBD                 | 47.7%  |  |
| CBG-A               | 0.17%  |  |
| CBG                 | 0.75%  |  |
| CBN                 | 0.12%  |  |
| CBC                 | 2.42%  |  |
| TERPENE CONTENT     |        |  |
| a-Pinene            | 0.75%  |  |
| b-Pinene            | 0.33%  |  |
| b-Myrcene           | 0.32%  |  |
| Limonene            | 0.75%  |  |
| b-Caryophyllene     | 0.50%  |  |
| Humulene            | 0.17%  |  |

#### PRODUCT B – TINCTURE



#### CANNABINOID CONTENT (mg per mL) THC-A 30.30mg THC 0.9mg **CBD-A** 0.3mg CBD <0.1mg **CBG-A** 0.34mg <0.1mg CBG 0.10mg CBN CBC 0.23mg **TERPENE CONTENT** a-Pinene < 0.01% < 0.01% **b**-Pinene 0.96% b-Myrcene Limonene < 0.01% b-Caryophyllene 0.12% Humulene 0.15%

#### PRODUCT C - CAPSULES



#### **CANNABINOID CONTENT (mg per pill)** THC-A <0.10mg THC 2.73mg **CBD-A** <0.10mg CBD 50.0mg **CBG-A** <0.10mg CBG <0.10mg CBN <0.10mg CBC 2.07mg **TERPENE CONTENT** a-Pinene < 0.01% <0.01% **b**-Pinene b-Myrcene < 0.01% Limonene < 0.01% b-Caryophyllene <0.01% Humulene <0.01%

#### PRODUCT D - TOPICAL

### **CPS** Lotion



PHARMACEUTICAL

| CANNABINOID CONTENT (mg per container) |         |  |
|----------------------------------------|---------|--|
| THC-A                                  | <0.10mg |  |
| тнс                                    | 0.21mg  |  |
| CBD-A                                  | <0.10mg |  |
| CBD                                    | 263mg   |  |
| CBG-A                                  | <0.10mg |  |
| CBG                                    | <0.10mg |  |
| CBN                                    | <0.10mg |  |
| CBC                                    | 0.02mg  |  |
| TERPENE CONTENT                        |         |  |
| a-Pinene                               | <0.01%  |  |
| b-Pinene                               | <0.01%  |  |
| b-Myrcene                              | <0.01%  |  |
| Limonene                               | <0.01%  |  |
| b-Caryophyllene                        | <0.01%  |  |
| Humulene                               | <0.01%  |  |

CANNABINOID CONTENT (mg per container)

### CASE STUDY #1

- Patient A comes into the dispensary for the first time and sits down with the pharmacist. He is diagnosed with severe back pain from an accident he suffered last year. His major complaints are pain in the evening time, as it keeps him up at night. He also has COPD and high blood pressure. His current medications include Furosemide, Amlodipine, and uses a ProAir inhaler prn. After looking at PMP, you also find he has been prescribed Percocet and Carisoprodol as well. He states he has used marijuana in the past, but not regularly.
- A: What should the pharmacist go over with Patient A?
- B: What product would best suit Patient A?
- C: What dose should the pharmacist recommend?

### CASE STUDY #2

- Patient B comes into the dispensary for the first time and presents with PTSD symptoms, mainly social anxiety and fatigue. She has been using cannabis for some time, but she sometimes feels that she gets more anxious after she smokes. She takes an alprazolam 0.5mg prn and amitriptyline 50mg hs. She does not have any other health conditions.
- A: What should the pharmacist go over with Patient B?
- B: What product(s) would be most appropriate for Patient B?
- C: What dose should the pharmacist recommend?

### CASE STUDY #3

- Patient C comes into the dispensary to speak with the pharmacist. She has been diagnosed with severe psoriasis and psoriatic arthritis. She has chronic angina, high blood pressure, high cholesterol, and recently suffered a stroke. Her current medications include Plavix, Lipitor, Ranexa, Ibuprofen prn, and uses Triamcinolone cream. Her symptoms are more local, but needs something to help with her pain and inflammation. She has not used cannabis before.
- A: What should the pharmacist go over with Patient C?
- B: What products should the pharmacist recommend?
- C: What dose should Patient C start out with?

# THE PHARMACIST'S ROLE

- Follow up with patients
  - Track symptom relief
  - Note medication changes
  - Document adverse effects
- Change strain / dose to optimize therapy
- Outreach
- Research



#### SIDE EFFECTS

### Short-Term Side Effects

Mood reactions (euphoria, relaxation, anxiety, time-distortion)

Rapid heartbeat Facial flushing Red eyes Dry mouth

> Headaches Dizziness

DIZZINESS

Coughing

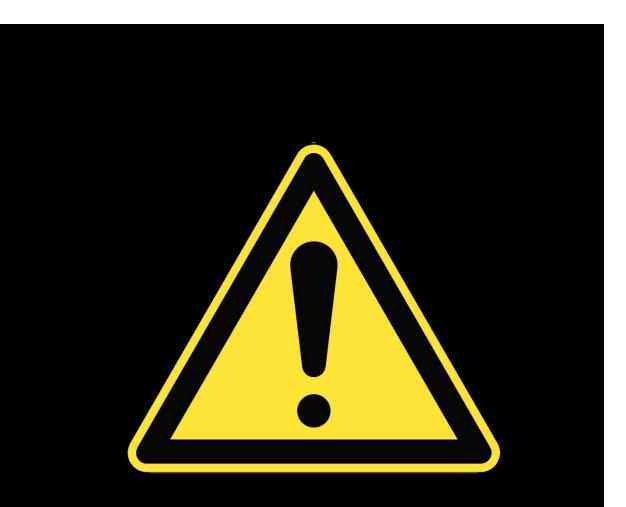
### Long-Term Side Effects

Severe, chronic bronchitis

Range of cognitive deficits

Receptor down-regulation (decline in receptor density)

#### **Risks/Warnings**



#### Contraindications

- Pregnancy / nursing
  - Lower birth weights
  - Endocannabinoids involved in several aspects of fetal and childhood development
  - Cannabinoids are passed along breast milk
- Serious mental disorders (i.e. schizophrenia)

### Use with caution for patients with:

- Heart conditions
- Respiratory conditions
- History of drug / alcohol abuse

#### **Risks/Warnings**



#### In case of overmedication:

- May potentiate / worsen side effects
- Will resolve after stopping medication
- Drinking water and eating may help, as well as fresh air
- Do not consume cannabis in a public place or where it may pose harm to others
- Never operate a vehicle after consuming marijuana
- Keep this medicine out of reach of children or pets

### Number of Deaths from

Cannabis







### Virginia Board of Pharmacy Pharmaceutical Processor Update

### Board of Pharmacy Retreat April 16, 2019

DHP Staff



### **Pharmaceutical Processor**

- Facility permitted by Board of Pharmacy
- Vertical operation
- Cannabidiol (CBD) oil or THC-A oil as defined in Code
- Pharmacist oversight
- Any diagnosed condition or disease determined by practitioner to benefit from such use



### Pharmaceutical Processor, cont.

- Independent laboratory tested for microbiological contaminants, mycotoxins, heavy metals, pesticide chemical residue, and active ingredient analysis
- Laboratory results available to registered patients, parents, guardians, and physicians upon request
- Board quarterly inspections required. www.dhp.virginia.gov



## **Five Conditional Approval Awardees**

- HSA I = PharmaCann Virginia LLC
- HSA II = Dalitso LLC
- HSA III = Dharma Pharmaceuticals
- HSA IV = Green Leaf Medical of Virginia LLC
- HSA V = Columbia Care Eastern Virginia LLC



### **Five Conditional Approval Awardees**

- Anticipated to be operational by December 2019
- Approximately 4-6 months to cultivate and produce oils



### **Affirmative Defense**

- Law provides for an affirmative defense for a patient, parent/legal guardian to possess CBD oil or THC-A oil as defined in §54.1-3408.3
- ....who has been issued a valid written certification from a Board of Pharmacyregistered physician
- ....and who maintains a current registration with the Board of Pharmacy.



### Written Certification Form

- Authorized since 2015
- Developed by Board of Medicine and Virginia Supreme Court
- Physician is provided access to the written certification once registered with Board of Pharmacy
- Nurse practitioners and Physician Assistants may obtain registration and issue written certifications after July 1, 2019



## Registrations as of 4/12/19

- 256 registered physicians
- 420 registered patients; 120 pending
- 7 registered parent/legal guardians



## **Status of Regulations**

- Revised emergency regulations effective 10/1/18 and scheduled to expire 8/5/19.
- Proposed replacement regulations adopted by board in September 2018.
  - Public comment period ends May 17, 2019
  - Regulation Committee to discuss on May 3, 2019
  - Board to adopt final regulations June 5, 2019



### **Action Items**

- Amend physician registration application and written certification to include nurse practitioners and physician assistants
- Develop form for physician to inform board of change in patient's eligibility
- Draft regulations for number of patients for whom registered agent may represent and regulations for wholesale distributing oils between processors
- Develop application for registered agent www.dhp.virginia.gov



### **Action Items**

- Develop form for registering oils, processes for assigning "NDC-like" number and reporting dispensed oils to PMP
- Create mechanism for processors to verify status of registrations
- Continue educating on law
- Finalize opening and routine inspection forms
- Train staff



### Update on Inspection Form & Training

- Development of form
- cGMPs for dietary supplements
- Visit to Connecticut



# **Questions?**

www.dhp.virginia.gov