



Office of Medical Cannabidiol
Iowa Department of Public Health
Lucas State Office Building, 6th Floor
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Medical Cannabidiol Dispensary Inspection Checklist

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Medical Cannabidiol Dispensary Inspection Checklist			
1.0 General Inspection Data			
Inspection: (circle)	Scheduled	Unscheduled	Annual
Licensee:		Inspection Date:	
Doing Business As:		Start:	
Primary Contact:		End:	
Facility Address:		Inspector:	

641-154.52 (124E) Inspection by Department or Independent Consultant

A dispensary is subject to reasonable inspection by the department, a department-approved consultant, or other agency as authorized by Iowa Code chapter 124E and the associated administrative rules, and local laws and regulations. Types of inspections may include:

Types of Inspections - 641-154.52(1):
Aspects of business operations
The physical location of a dispensary, including any storage facilities
Financial information and inventory documents
Physical and electronic security system
Other inspections as determined by the department

This inspection checklist is intended to assist the medical cannabidiol dispensary in becoming operational by December 1, 2018. It also contains information that the Office of Medical Cannabidiol will monitor for regulatory compliance as the dispensary continues operations.

Grading Criteria:
C = Compliant
NC = Not Compliant
NE = Not Evaluated
NA = Not Applicable

For additional information or questions concerning this checklist or the medical cannabidiol program, please contact Owen Parker, Medical Cannabidiol Program Manager, Owen.Parker@idph.iowa.gov.



2.0 Dispensary Operations - 641-154.41(1) - The operating documents of a manufacturer shall include all of the following, and be available for inspection:					
Rule	C	NC	NE	N/A	Comments
2.1 Procedures for the oversight of the dispensary, including descriptions of operational and management practices regarding:					
2.1.1 The forms and quantities of medical cannabidiol products that will be stored and dispensed in the facility					
2.1.2 The estimated types and amounts of medical cannabidiol waste and plant material waste to be generated					
2.1.3 The disposal methods for all waste					
2.1.4 Employee training methods for dispensary employees					
2.1.5 Strategies for identification and reconciling discrepancies in inventory of medical cannabidiol					
2.1.6 Medical cannabidiol labeling procedures					
2.1.7 Procedures for recall and market withdrawal of medical cannabidiol					
2.1.8 Plans for responding to a security breach at the dispensary					
2.1.9 A business continuity plan					
2.2 Procedures for the implementation of the appropriate security measures to deter and prevent the theft of medical cannabidiol and unauthorized entrance to the dispensary					



3.0 Security Requirements - 641-154.42 – The department may request assistance from the department of public safety in ensuring manufacturers meet the security requirements in this rule.					
Rule	C	NC	NE	N/A	Comments
3.1 154.42(1) – Restricted Access – A dispensary shall use a controlled access system and written manifest to limit entrance to all restricted access areas of the dispensary facility and shall retain a record of all persons who entered the restricted access areas, a) and shall do all of the following:					
3.1.1 Limit access to authorized individuals					
3.1.2 Maintain a log of individuals with approved access, including dates of approvals and revocations					
3.1.3 Track times of personnel entry to and exit from facility					
3.1.4 Store data for retrieval for a minimum of one year					
3.1.5 Remain operable in the event of a power failure					
3.1.6 Restricted access areas shall be identified with signs that state: “Do Not Enter – Restricted Access Area – Access Limited to Authorized Personnel Only”					
3.2 154.42(2) – Perimeter Intrusion Detection System – a) Computer-Controlled Video Surveillance System – A dispensary shall operate and maintain in good working order a computer-controlled, closed-circuit television surveillance system on its premises that operates 24 hours a day, 7 days a weeks, and visually records:					
3.2.1 All areas that might contain medical cannabidiol, including safes and vaults					
3.2.2 All points of entry and exit					
3.2.3 The entrance to the video surveillance control room					
3.2.4 Parking areas, which shall have appropriate lighting for the normal conditions under surveillance					
b) Camera Specifications - Camera shall:					
3.2.5 Capture clear and certain identification of any person entering or exiting the dispensary					



Rule	C	NC	NE	N/A	Comments
3.2.6 Have on all recordings an embedded date-and-time stamp that is synchronized to the recordings and does not obscure the picture					
3.2.7 A dispensary shall maintain all security system and equipment in a secure location to prevent theft, loss, destruction, corruption, and alterations					
3.2.8 Have the ability to produce a clear, color, still photo live or from a recording					
3.2.9 Continue to operate during a power outage					
c) <i>Video recording specifications:</i>					
3.2.10 A video recording shall export still images in a standard image format (.jpg, .bmp, .gif, etc.)					
3.2.11 Video is saved in format that guarantees image cannot be altered					
3.2.12 Image can be played on a standard computer operating system					
3.2.13 Recordings are destroyed or erased prior to disposal at the end of the retention period					
d) <i>Retention</i> – A dispensary shall ensure that recordings from all video cameras are:					
3.2.14 Available to the department upon request					
3.3.15 Retained for at least 60 days					
3.3.16 Retained free of alteration or corruption					
e) <i>Required Signage</i> – 3.3.17 A dispensary shall post a sign at every entrance to the dispensary that reads “THESE PREMISES ARE UNDER CONSTANT VIDEO SURVEILLANCE”					
3.3 154.42(3) – Security Alarm System Requirements –					
a) A dispensary shall install and maintain a professionally monitored security system that provides intrusion and fire detection of all:					
3.3.1 Dispensary entrance and exits					
3.3.2 Rooms with exterior windows					
3.3.3 Rooms with exterior walls					
3.3.4 Roof hatches					



Rule	C	NC	NE	N/A	Comments
3.3.5 Skylights					
3.3.6 Storage Rooms					
b) Alarm system has the ability to continue to operate during a power outage					
c) The alarm system has been inspected and tested annually by a qualified alarm vendor. Documentation of testing is available upon request					
3.4 154.42(4) – Personnel Identification System – a) Employee identification card requirements:					
3.4.1 Employee Name					
3.4.2 Date of issuance and expiration					
3.4.3 Alphanumeric identification number that is unique to the employee					
3.4.4 Photographic image of employee					
b) A dispensary’s employees keep the identification visible at all times					

4.0 Advertising and Marketing - 641-154.44(1) – Permitted marketing and advertising activities. – a) dispensary may:					
Rule	C	NC	NE	N/A	Comments
4.1 Display the dispensary’s business name and logo on medical cannabidiol labels, signs, and informational material provided to patients, the name or logo shall not include:					
4.1.1 Images of cannabis or paraphernalia					
4.1.2 Colloquial references to cannabis					
4.1.3 Names of cannabis plant strains or varieties					
4.1.4 Unsubstantiated medical claims					
4.1.5 Medical symbols that bear a resemblance to medical associations					
4.2 154.44(3) –Inconspicuous display – A dispensary shall arrange displays of medical cannabidiol, interior signs, and other exhibits to prevent public viewing from outside the dispensary					



5.0 Storage - 641-154.45					
Rule	C	NC	NE	N/A	Comments
5.1 154.45 (1) – Storage of saleable medical cannabidiol					
a) A dispensary shall store medical cannabidiol to prevent diversion, theft, or loss, including ensuring:					
5.1.1 Medical cannabidiol is kept in a secure and monitored location within the dispensary					
5.1.2 Cabinets or storage containers inside the secure and monitored area are locked at the end of the day					
b) A dispensary shall store medical cannabidiol:					
5.1.3 In areas that are maintained in a clean, orderly, and well-ventilated condition					
5.1.4 In areas that are free from infestation by insects, rodents, birds, and other pests of any kind					
5.1.5 According to the manufacturer’s requirements regarding temperature, light exposure, or other environmental conditions					
5.1.6 Under conditions that will protect it against physical, chemical, and microbial contamination and deterioration of the product and its container					
5.2 154.45(2) – Storage of returned medical cannabidiol					
5.2.1 A dispensary shall maintain a separate secure storage area for medical cannabidiol that is to be returned to the manufacturer					



6.0 Dispensing - 641-154.46 (1) & (3) – Storage of saleable medical cannabidiol:					
Rule	C	NC	NE	N/A	Comments
6.1 154.46(1) - <i>Access to all forms of product</i> – A dispensary shall provide access to all medical cannabidiol forms produced by each licensed manufacturer					
6.2 154.46(2) – <i>Dispensing to a patient or primary caregiver</i> – a) prior to dispensing any medical cannabidiol to a patient, a dispensary shall do all of the following:					
6.2.1 Verify the patient or primary caregiver’s identity					
6.2.2 Verify that the patient or primary caregiver is registered and listed in the secure sales and inventory tracking system and has a valid medical registration card					
6.2.3 Assign a tracking number to any medical cannabidiol that is to be dispensed to the patient or primary caregiver					
6.2.4 Issue a label that contains the following information:					
6.2.4.1 The medical cannabidiol tracking number					
6.2.4.2 The date and time the medication is being dispensed					
6.2.4.3 The name and address of the dispensary					
6.2.4.4 The patient’s registry identification number, name, and date of birth					
6.2.4.5 The patient’s address, and					
6.2.4.6 Any specific instructions for use based upon manufacturer or departmental guidelines. Labeling text shall not include any false, misleading, or unsubstantiated statements regarding health or physical benefits to the patient					



7.0 Disposal of Medical Cannabidiol - 641-154.48 – Return of medical cannabidiol from a patient or primary caregiver to a dispensary					
Rule	C	NC	NE	N/A	Comments
7.1 154.48(1) – <i>Identification of excess, expired, or damaged medical cannabidiol</i>					
7.1.1 Dispensaries shall identify unused, excess, expired, or damaged medical cannabidiol					
7.1.2 Unused, excess, expired, or damaged medical cannabidiol shall be stored as described in subrule 154.45(2)					
7.2 154.48(2) - a) A dispensary shall accept at no charge unused, expired, or unwanted medical cannabidiol from any patient or caregiver					
b) The dispensary shall enter the following information into the secure sales and inventory tracking system for all medical cannabidiol returned from a patient or primary caregiver:					
7.2.1 The tracking number assigned at the time of the dispensing, if available, or the name of the patient, if the tracking number is unavailable, when the medical cannabidiol is received from a patient or primary caregiver;					
7.2.2 The date the medical cannabidiol was returned					
7.2.3 The quantity of medical cannabidiol returned, and;					
7.2.4 The type and lot number of medical cannabidiol returned					
7.2.5 A dispensary shall store medical cannabidiol returned from patients and primary caregivers as described in subrule 154.45(2)					



Rule	C	NC	NE	N/A	Comments
7.3 154.48(3) – <i>Return of medical cannabidiol to a manufacturer</i> – a) A manufacturer shall collect and dispose of medical cannabidiol from dispensaries as provided in rule 641-154.23					
b) A dispensary shall record information on all medical cannabidiol collected by the manufacturer in the secure sales and inventory tracking system. Information shall include:					
7.3.1 The date the medical cannabidiol was collected by the manufacturer					
7.3.2 The quantity of medical cannabidiol collected					
7.3.3 The type and lot number of medical cannabidiol collected					



8.0 Inventory - 641-154.51					
Rule	C	NC	NE	N/A	Comments
8.1 154.41(1) – <i>Inventory controls and procedures</i> – A dispensary shall establish inventory controls and procedures for conducting inventory reviews to prevent and detect any diversion, theft, or loss in a timely manner					
8.2 154.51(2) – <i>Real-time inventory required</i> – A dispensary shall use the state-approved secure sales and inventory tracking system to maintain a real-time record of the dispensary’s inventory of medical cannabidiol to include:					
8.2.1 The quantity and form of saleable medical cannabidiol maintained at the dispensary on a daily basis					
8.2.2 The amount of damaged, expired, or returned medical cannabidiol being held at the dispensary for return to a manufacturer					
8.3 154.51(3) – <i>Reconciliation</i> – At least once a calendar week, a dispensary shall reconcile all medical cannabidiol at the dispensary with the secure sales and inventory tracking system. Inconsistencies shall be reported to the department and law enforcement within 24 hours of discovery					



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9.0 Inspections and Briefing Acknowledgement		
Item	Acknowledgement	Comments
An exit interview was conducted		
Deficiencies and plans for correction were discussed with the facility representative		

I have received information on the above subjects, and am aware I must become familiar with and abide by the laws covering the licensing and operation of my business as prescribed in Iowa Code chapter 124E and the associated rules. I am aware that the department reserves the right to assess penalties for violations of noncompliance.

 Licensee Authorized Representative

 Date

 Inspector

 Date