

[APPLICANT NAME]

AUDITOR NAME | DISTRIBUTION CERTIFICATION AUDIT | [FACILITY LOCATION]

DATE OF AUDIT: [Date]

TIME ON SITE: [Click here to enter text.](#)

AUDIT CHECKLIST	NOT APPLICABLE	YES	CORRECTIVE ACTION NEEDED	ITEMS NEEDED FOR COMPLIANCE
A1.1 • Subject operations – is this operation subject to state and/or local oversight?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
A1.2 • Other statutory provisions and regulations – is this operation compliant (i.e. has a license in good standing, certificate of occupancy, confidentiality requirements, labeling and testing requirements, etc.) with all applicable regulations in the jurisdiction in which it operates.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.1(a) • Types of distribution operations – is this operation a storefront, delivery service, or direct from garden operation? Or is this operation a cooperative subject to regulatory oversight?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.1(b)(1) • Cannabis acquisition and distribution – does the operation have policies and procedures to limit the distribution of cannabis to cannabis that has been: <ul style="list-style-type: none">-cultivated by the operation itself;-cultivated by a co-owned operation; or-obtained from a cultivation operation or vendor?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>B2.1(b)(2) • Cannabis-derived product distribution – does the operation have policies and procedures to limit the distribution of cannabis-derived products to cannabis-derived products that have been:</p> <ul style="list-style-type: none"> -manufactured by the operation itself; -manufactured by a co-owned operation; or -obtained from a manufacturing operation or vendor? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.2 • Ancillary operations – if there are operations other than cannabis distribution conducted at the location, is there sufficient evidence that these ancillary operations are conducted in compliance with all regulations in the jurisdiction in which it operates?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.3(a) • Personnel training – does the operation have a mechanism for communicating with all employees and have evidence that employees have received training including:</p> <ul style="list-style-type: none"> -specific uses of cannabis or a specific cannabis-derived product; -clinical application of the specific constituents; -the laws, regulations, and policies relevant to providing cannabis products in its jurisdiction; and -instruction for regulatory inspection preparedness and law-enforcement interactions? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.3(c) • CPR – if the operation is a storefront operation, has it ensured that a properly trained employee is prepared to administer CPR at all times when the operation is open for business? *NOTE: there may be valid legal reasons to prohibit compliance with this regulation in certain jurisdictions.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.4(a) • Physical facilities – does the operation have sufficient evidence that it operates in adherence with any regulation in the jurisdiction in which it operates, including:</p> <ul style="list-style-type: none"> -locations and zoning, for all type of operations at the facility; -business hours; -parking; -drive-through services; and 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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-signage?				
B2.4(a) • Sanitation and equipment – is the operation in a clean and orderly condition and properly equipped with utensils and equipment needed for operations (i.e. certified scales, tongs, sanitary packaging, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.4(a) • Privacy of transactions – does the operation have evidence it has implemented a privacy of transactions policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.4(a) • Patient legal information – does the operation have information available to patients and caregivers regarding local and federal laws on cannabis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
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B2.4(b) • Storage of product and cash – does the operation: -adequately refrigerate products that require refrigeration; -provide and use a secure area for storage of all cannabis products; and -provide and use a secure area to store and have procedures in place to remove money from the premises frequently?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.4(c)(1) • ADA – does the operation have sufficient evidence that it is in compliance with applicable Americans with Disabilities Act provisions or equivalent regulations in the jurisdiction in which it operates?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
B2.4(c)(2) • On-site consumption – does the operation have a policy in place regarding on-site consumption? If the operation allows on-site consumption, is it in compliance with all regulations in the jurisdiction in which it operates? Does the consumption policy address: -the type or types of consumption allowed; -a time limit to on-site consumption, if advisable; -a ventilation plan if needed;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>-a protocol to prevent and address over-medication; and</p> <p>-any additional issues as needed.</p>				
<p>B2.5(a) • Security practices – does the operation have significant evidence that it is in compliance with required security regulations in the jurisdiction in which it operates?</p> <p>-If it is a storefront operation: does it have sufficient in-store security personnel to ensure staff and patient security; in-store security cameras; and physical or video monitoring of dedicated parking?</p> <p>-If it is a delivery service operation: does it have sufficient security personnel at the facility where products are acquired, stored or processed to ensure staff and product security; evidence of training of delivery staff to ensure personal and product safety; policies that restrict deliveries to private addresses only (no public locations); and evidence that they are compliant with regulations regarding delivery areas and hours of operation.</p> <p>-If it is a direct-from-garden operation: does it have sufficient evidence of security practices at the growing facility and associated locations where product or money is kept or transferred from to ensure the safety of staff and products?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.5(b)(2) • Armed security – does the operation refrain from using armed security personnel or have sufficient evidence that they are using armed security in strict accordance with all relevant legal requirements in the jurisdiction in which they operate?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.5(b)(3) • Security training – does the operation have sufficient evidence that it provides staff with security procedures and makes sure staff is aware of their individual roles and responsibilities?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>B2.5(c) • Security at ancillary operations – if the operation is also engaged in cultivation, processing, or manufacturing operations, does it have sufficient evidence that it is compliant with security requirements for such operations?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.1(b) • Cannabis provision records – does the operation maintain up-to-date records of the cannabis products it provides, including identification of each cannabis product, identification of the cultivator, processor, manufacturer and/or vendor of each cannabis product?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>C3.1(b) • Cannabis provision restrictions – if the operation is subject to any restrictions on the provision of cannabis (i.e. weight limits for patients, age limits for staff) does it have sufficient evidence it is in compliance?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.2 • Cannabis product acquisition – if the operation receives cannabis products from one or more cultivation, processing, or manufacturing operation, or from one or more vendors, has it established and implemented policies on such cannabis products that are compliant with any regulation in the jurisdiction in which it operates, informs the operations and vendors of the established policies, and includes:</p> <ul style="list-style-type: none"> -locations for receipt of cannabis products that minimize the delivery times and locations when patients or caregivers are present, if space allows; -scheduling deliveries individually or by establishing open vending times; and -establishing policies required by the operation for cultivation, processing, and/or manufacturing operations and vendors regarding cultivation practices, processing or manufacturing, packaging or labeling, chemical analysis, or transport conditions, such as refrigeration? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.2 • Cannabis product records – does the operation maintain records of each receipt of cannabis product including the name of the cultivation, processing, or manufacturing operation or vendor; a description of the cannabis product of sufficient specificity; and a statement of the quantity of each cannabis product?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.3(a) • Cannabis information – does the operation have sufficient evidence that any information it provides, whether written or verbal, about the identity, quality, and cultivation conditions of cannabis is accurate?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.3(b) • Cannabis product testing – if the operation conducts testing on cannabis products does it properly disclose by visible signage or with printed handouts provided to each patient or caregiver and on any website which cannabis products are available for ordering or sale (prior to ordering or purchasing):</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>-the type or test or examination used, if any, to determine the particular strain or cultivar of each lot of cannabis provided;</p> <p>-whether or not the cannabis provided is tested to determine the quantitative levels of constituents, and if so, the type of testing used;</p> <p>-whether or not the cannabis provided is tested to determine the absence or presence of specific classes of potential contaminants, and if so, the type of testing used for pesticides, yeast and molds, and other microbiological contaminants?</p>				
<p>C3.3(c) • Cannabis-derived product information – is the information provided by the operation about the cannabis-derived products it provides:</p> <p>-accurately conveyed through labeling or other accurate markings or communications, in a manner compliant with all relevant requirements if manufactured by the distribution operation; or</p> <p>-if provided by another manufacturer, provides information as provided by each product’s manufacturer, such that the operation did not modify the labeling or other information provided by such product’s manufacturer? Does the operation seek clarification or correction of any information provided by a manufacturer if it has reason to believe the information is not accurate?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.4(a) • Cannabis product recalls – Does the operation have an established policy for communicating a recall of a cannabis product that has been shown to present a reasonable or a remote probability that the use of or exposure to the product will cause serious adverse health consequences, or could cause temporary or medically reversible adverse health consequences that includes:</p> <p>-a mechanism to contact all customers who have, or could have, obtained the product from the operation including information on the policy for return or destruction of the recalled product;</p> <p>-a mechanism to contact the cultivation, processing or manufacturing operation or vendor which supplied the product; and</p> <p>-communication and outreach via media, as necessary and appropriate.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>C3.4(b) • Disposal of product – does the operation have sufficient evidence to show that any cannabis product returned to the</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>operation is either: disposed of by the operation in a manner that ensures it cannot be salvaged and will not be used by a patient or any other person; or is returned to its cultivator, processor, or manufacturer for such disposal.</p>				
<p>D4.1 • Requirements for purchase – does the operation have sufficient evidence that it:</p> <ul style="list-style-type: none"> -only provides cannabis products to compliant individuals (patients and caregivers) and does not provide cannabis products to any other person; -does not recommend use of any cannabis product for any health or medical condition that is not authorized by statute or regulation in the jurisdiction in which it operates; -ensures employees who provide cannabis products are aware of the legal requirements for becoming a patient or caregiver; and -makes available information on the regulations that apply in the jurisdiction in which it operates for obtaining and maintaining status as a patient or caregiver. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>D4.2 • Purchase limits – does the operation have sufficient evidence that it complies with quantitative limits on the amount of cannabis products obtained in a given timeframe by a patient or caregiver if such regulations exist in the jurisdiction in which it operates? An operation may establish their own purchase limits if none exist by regulation. If any such policy exists, does the operation clearly communicate any purchase limits to patients and caregivers?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>D4.3 • Personal information – does the operation have sufficient evidence that it obtains identifying information for each patient and caregiver that it provides cannabis products to, including the individuals name; contact information of sufficient specificity to serve as a means of contact, such as a phone number, email address, or mailing address; a physician of record identified by the patient or caregiver; and the health or medical condition for which cannabis products are used? Does the operation obtain and store all identifying information about patients or caregivers in compliance with HIPAA or any regulations regarding privacy in the jurisdiction in which it operates?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

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<p>D4.4 • Adverse event records – has the operation established a policy for receiving and recording adverse event reports associated with the use of cannabis products it provides including:</p> <ul style="list-style-type: none"> -identification of the minimum data elements to record for any adverse event report including the individual reported to have experienced the adverse event; the initial reporter (which may be the same individual); if known, the identity of the cannabis product used; and a description of the cannabis event; -a procedure for determining if an adverse event should be reported to any public health authority; be reported to the physician of record for the patient reported to have experienced the event, if known; and -procedures for communicating the policy to employees of the operation that require knowledge of the policy and patients and caregivers who are provided cannabis products by the operation? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
<p>D4.5 • Rights and responsibilities of patients and caregivers – has the operation established a policy that describes the rights and responsibilities of patients and caregivers who obtain cannabis products from the operation including:</p> <ul style="list-style-type: none"> -how they can expect to be treated by employees of the operation; -information that each patient or caregiver is required or requested to provide the operation; -a procedure for providing feedback and suggestions, including procedures for communicating commendations and complaints; -contact information for the operation, and for specific employees to contact; -hours of operation; and -the operation’s policies related to payment for cannabis products, use of cannabis products on the premises, and any other applicable policies? 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.