Cleveland Clinic

Medical Marijuana Policy

Target Group:		Original Date of Issue:	Version
Cleveland Clinic United States locations		Not Set	1
Approved by:	**Date Last Approved/Reviewed:**	**Prepared by:**	**Effective Date**
Board of Directors-Main, BOG/MEC-Main	02/06/2019	Allison Riffle (Assistant Director Pharmacy)	02/06/2019

Avon Hospital: MEC approval date: Board approval date: Effective Date:	**Euclid Hospital:** MEC approval date: Board approval date: Effective Date:
Fairview Hospital: MEC approval date: Board approval date: Effective Date:	**Hillcrest Hospital:** MEC approval date: Board approval date: Effective Date:
Lutheran Hospital: MEC approval date: Board approval date: Effective Date:	**Marymount Hospital:** MEC approval date: Board approval date: Effective Date:
Medina Hospital: MEC approval date: Board approval date: Effective Date:	**South Pointe Hospital:** MEC approval date: Board approval date: Effective Date:
CCCHR: MEC approval date: Board approval date: Effective Date:	**Weston:** MEC approval date: Board approval date: Effective Date:
	Coral Springs, FL ASC/FHC: MEC/CSOC approval date: Board approval date: Effective Date:

Purpose

To ensure compliance with state and federal regulations regarding medical marijuana.

Policy Statement

Marijuana and non-FDA (Food and Drug Administration) approved marijuana-associated components are Schedule I Controlled Substances, referred to in this policy as medical marijuana. Cleveland Clinic United States does not allow the use of medical marijuana. When an employee finds a patient to be in possession of medical marijuana, the employee shall contact the Cleveland Clinic Police Department (CCPD) or Security.

Policy Implementation

1) Medical marijuana is not allowed for use within Cleveland Clinic facilities.
2) When an employee finds a patient to be in possession of medical marijuana, the employee must immediately contact the CCPD.
    a. If the patient wishes to give the medical marijuana to a registered caregiver to take home, the police officer will verify the patient's and caregiver's medical marijuana registration cards. The transfer of medical marijuana will be witnessed by the police officer.
        i. Samples of these registration cards will be obtained and provided by the Drug Diversion Inspector and maintained for reference by CCPD.
        ii. If a state operationalizes the use of a medical marijuana registration database via National Crime Information Center (NCIC) or the state Prescription Drug Monitoring Program (PDMP) (for example, Ohio Automated Rx Reporting System - OARRS), then the police officer shall confirm registration through the Communications Center utilizing NCIC or a Drug Diversion Inspector will confirm registration through the PDMP.
    b. If the patient is not registered, or there is no registered caregiver, the police officer will confiscate the medical marijuana for destruction.
3) Cleveland Clinic Florida employees should contact Security, who will confiscate the medical marijuana and transfer to the Broward County Sheriff's Office for destruction.

Definitions

Cleveland Clinic United States locations: Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, Cleveland Clinic Florida, Cleveland Clinic Hospital (Weston), Coral Springs Ambulatory Surgery Center, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

Schedule I Controlled Substances –Federally regulated substances classified by the Drug Enforcement Administration (DEA) as having no currently accepted medical use in the United States, a lack of accepted safety for use under medical supervision, and a high potential for abuse.

Medical marijuana – Marijuana and non-FDA approved associated components and/or ingredients; including, but not limited to: cannabadiol (CBD) and tetrahydrocannabinol (THC).

Registered patient/caregiver – A person registered with the state to legally possess medical marijuana. Ohio, Nevada, and Florida state law require patients and caregivers who are legally registered to possess medical marijuana must to carry a state registration card at all times.

Prescription Drug Monitoring Program (PDMP) - Statewide program that collects information about controlled substance prescription drugs that are dispensed to patients within the state.

Ohio Automated Rx Reporting System (OARRS) – The PDMP utilized in the state of Ohio.

National Crime Information Center (NCIC) - The United States' central database for tracking crime-related information.

Regulatory Requirement/References

Title 21 Code of Federal Regulations (C.F.R.) 1308.11 through 1308.15
Ohio Administrative Code 3796:7-2-05
Nevada Revised Statutes 453A.140
Florida Administrative Code 64-4.011
Sections 932.701-932.7062 Florida Contraband Forfeiture Act

Oversight and Responsibility

The Department of Pharmacy is responsible to review, revise, update, and operationalize this policy to maintain compliance with regulatory or other requirements.

It is the responsibility of each hospital, institute, department and discipline to implement the policy and to draft and operationalize related procedures to the policy if applicable.