

# Marijuana & CBD Policy California & Massachusetts Locations

March 2024

## POLICY

It is the policy of Hume Health Centers to provide safe management and administration of campers' prescribed medications. Hume Health Center staff abide by the Scope and Standards of Camp Nursing Practice (Association of Camp Nursing, 2017) which require health centers to "ensure that nursing practice is safe, effective, efficient, equitable, timely and client centered." Hume Health Center staff assist campers attending Hume locations by collecting medications at the start of camp, securing, filling, and administering the proper dose of the medications as prescribed to the appropriate camper, at the appropriate time. Hume Health Centers also provide over-the-counter medications based on standing orders from our medical directors.

Marijuana (see definition below) is a Schedule 1 substance under the authority of the United States Drug Enforcement Administration (DEA). As such, marijuana cannot be prescribed, dispensed, or administered by a Medical Provider for medical use. Medications containing THC that are regulated by the FDA range from controlled substance schedule II-III.

CBD Oil (see definition below), its associated products and methods of administration present a special challenge for Hume Health Centers. When considered a supplement (plant derived), CBD Oil is not regulated by the United States Food & Drug Administration (FDA); thus, there is no definitive mechanism for Hume Health Center staff to know if the product meets the following requirements:

- CBD Oil must be derived from the hemp portion of the cannabis plant to be classified as "legal" (Agricultural Improvement Act of 2018). CBD Oil derived from the marijuana portion of the cannabis plant is Schedule 1 Drug; as such, it may not be prescribed, dispensed, or administered for medical use, per the Controlled Substances Act.
- The federal government states that hemp must contain less than 0.3 percent THC (Cadena, 2019).

To ensure that CBD Oil is not interfering with a camper's regular medications or with a camper's well-being, Hume Health Centers will only administer CBD Oil products if prescribed by a licensed medical provider. Synthetic formulations of CBD are not considered a controlled substance.

Hume Health Center staff abide by the Scope and Standards of Camp Nursing Practice (Association of Camp Nursing, 2017) which require health centers to "ensure that nursing practice is safe, effective, efficient, equitable, timely and client centered."

## DEFINITIONS

1) Camper: A student at a Hume location that is participating in youth programs.

2) CBD (Cannabidiol) Oil: Oil that is derived from the hemp portion of the cannabis plant and contains less than 0.3 percent THC.

3) Marijuana: Parts of or products from the biological plant *Cannabis sativa* that contain substantial amounts of tetrahydrocannabinol (THC).

4) Medical Provider: An individual who is licensed to prescribe medications in the state in which they practice: a medical doctor (MD), Doctor of Osteopathy (DO), Naturopathic Doctor (ND), Physicians Assistant (PA) or Advanced Practice Nurse (APRN).

5) Schedule 1 Substance: Drugs, substances, or chemicals with no currently accepted medical use and have a high potential for abuse, as defined by the United States Drug Enforcement Administration.

#### PROCEDURE

1) Marijuana

- a. Marijuana will not be secured, managed, or dispensed in any biological form at Hume Health Centers.
- b. Medications containing synthetic THC (not biological THC) may possibly be managed and dispensed to Campers by Hume Health Centers only if all the following criteria are met:
  - i. The medication is approved by the United State Food and Drug Administration. Examples of this type of medication would be Marinol, Syndros or Cesamet.
  - ii. The medication must be prescribed for treatment of symptoms or conditions approved by the FDA.
  - iii. A Hume Health Center Medical Director must be notified and he/she must provide written approval (email is acceptable) in advance of the Camper's arrival at camp.
  - iv. A prescription label on the bottle or package of the medication must indicate the following (as is required for all prescribed medications):
    - 1. Patient/camper's Name
    - 2. Name of Patient/camper's Medical Provider

- 3. Dose
- 4. Route of administration
- 5. Time of administration (8:00 am, Noon, 5:00 pm, etc.)
- 6. If the prescription indicates "as needed", a maximum dose per day and appropriate time between doses must be indicated.
- c. Medications containing synthetic THC may only be administered by a Registered Nurse or Medical Provider who is a part of the regular or volunteer Hume Health Center staff. At no time may any of these medications be self- administered by the Camper or administered by a Camper's counselor.
- d. Upon arrival of this medication at camp, the group leader will count the medication with an RN or Medical Provider and the number will be documented. This count will be done again when the medication is returned to the group leader for transport home.
- e. These medications will be stored in the locked safe or refrigerator and accessed only by an RN or Medical Provider for administration.

2) CBD Oil

- a. CBD Oil has several routes of administration including vaping, sublingual (under the tongue), edible and topical. Three of these routes are allowed at Hume locations if the criteria listed below are met:
  - i. Vaping
    - 1. Vaping of any kind is not allowed at any Hume location.
    - 2. Medical Providers prescribing a vaped CBD Oil product to their patient will need to prescribe a different route of administration while the camper/patient is participating at any Hume location.
- b. These routes are allowed at Hume locations if the criteria below are met:
  - i. Sublingual (under the tongue), edible and topical
    - 1. Administration must be performed by a Registered Nurse or Medical Provider who is a part of the regular or volunteer Hume Health Center staff.
    - 2. Campers may not self-administer any CBD Oil whether sublingual, edible or topical.
    - 3. Hume Health Center staff should don gloves for application or administration of any CBD oil product.
- c. For CBD Oil edibles, sublingual or topical administration, the following criteria must be met. These criteria are based on widely accepted patient safety protocols and ensure a safe environment for all campers.

- i. CBD Oil and its associated products must be prescribed by a licensed Medical Provider.
- ii. A prescription label on the bottle or package of the CBD Oil product must indicate the following:
  - 1. Patient/camper's Name
  - 2. Name of Patient/camper's Medical Provider
  - 3. Dose
  - 4. Route of administration
  - 5. Time of administration (8:00 am, Noon, 5:00 pm, etc.)
  - 6. If the prescription indicates "as needed", a maximum dose per day and appropriate time between doses must be indicated.
- d. Upon arrival of CBD products at camp, the group leader will count the medication with an RN or Medical Provider and the number will be documented. This count will be done again when the medication is returned to the group leader for transport home.
- e. These medications will be stored in the locked safe or refrigerator and accessed only by an RN or Medical Provider for administration.
- f. CBD approved by the United States Food & Drug Administration (FDA), such as Epidiolex, and prescribed by a Medical Provider, will be managed and administered in accordance with the normal Hume Health Center protocols assuming all criteria for prescriptions are met.

#### REFERENCE

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