

## **Remote Dispensing and Telehealth Procedures**

*Technical updates made on October 28, 2025 to document dated October 2, 2025.*

### **Purpose**

The Department of Consumer Protection (“DCP”) is issuing this guidance to provide information and recommendations on how hybrid retailers and dispensary facilities can provide for the dispensing of cannabis and consultation services remotely without a pharmacist on the premises (“remote pharmacy work”) while ensuring protection of protected health information (“PHI”). This guidance represents the current policies of the DCP on this topic. It does not establish any rights, nor is binding on DCP or the public. DCP acknowledges there may be alternative approaches to dispensation and consultation that meet the statutory and regulatory requirements. Licensees may use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the DCP via email at [dcp.cannabis@ct.gov](mailto:dcp.cannabis@ct.gov).

### **Pharmacist Telehealth Consultations**

#### **What information needs to be protected when engaging in remote pharmacy work?**

Protected Health Information, or PHI, needs to be protected in remote pharmacy work to prevent disclosure in the same manner as it would during on-site care. PHI is individually identifiable health information held, transmitted or maintained by an entity in any form or media, whether electronic, paper, or oral. Information collected by a covered entity relating to the past, present or future health or condition of an individual is PHI. Some PHI examples include medical records, facial photos, and cannabis allotment limits.

#### **What is telehealth?**

[Telehealth](#) means the mode of delivering health care or other health services via information and telecommunication technologies to facilitate the diagnosis, consultation, treatment, education, care management and self-management of a patient's physical and mental health. It includes synchronous interactions, like the consultation between a patient and pharmacist in different locations, as well as asynchronous transactions, like the transmission of a patient's medical information to the health care provider. Telehealth at a cannabis establishment is subject to the record keeping requirements of section [21a-421j-6 of DCP’s Policies and Procedures](#).

#### **Can a hybrid retailer and a dispensary facility provide telehealth consultations to a qualifying patient or caregiver?**

Yes, at all times while a hybrid retailer and dispensary facility establishment is open to the public, even if a licensed pharmacist is not physically present at that location, a licensed pharmacist is

required to be available for qualifying patient and caregiver consultations. If offering telehealth consultations, it is the responsibility of the hybrid retailer and dispensary facility to ensure that a licensed pharmacist is readily available to provide telehealth consultations for qualifying patients and caregivers in a private space with adequate telehealth communication technology.

### **Where can telehealth services be performed?**

Telehealth services can be delivered from any location to a qualifying patient in any other location so long as the pharmacist is licensed in Connecticut and PHI is protected from disclosure.

### **What are the requirements for a pharmacist that provides telehealth consultations at a hybrid retailer and dispensary facility?**

The pharmacist must be licensed in Connecticut and working as a registered employee or key employee of that hybrid retailer or dispensary facility for at least twenty hours per calendar week. In addition to a Connecticut pharmacist license, the pharmacist must maintain a medical marijuana dispensary license and their affiliation with each hybrid retailer or dispensary facility should be reflected in eLicense. Also, a licensed pharmacist who consults with qualifying patients or caregivers is required to complete five contact hours of continuing professional education yearly related to the cannabis industry, the pharmacy laws of this state or the treatment of debilitating medical conditions. These contact hours will count toward the fifteen contact hours required to maintain a pharmacist license.

### **Can a pharmacist provide a telehealth consultation by phone?**

Yes, both federal and state telehealth rules permit consultations via telephone. Additionally, [Public Act 25-166](#) requires that hybrid retailers and dispensary facilities accommodate telehealth phone consultations.

### **What technological security is required for remote pharmacy work such as telehealth consultations?**

Hybrid retailers and dispensary facilities should use HIPAA-compliant technologies as well as an electronic system that complies with [DCP's Policies and Procedures section 21a-421j-17](#) when creating, maintaining or receiving electronic protected health information. Hybrid retailers and dispensary facilities must establish, implement and maintain reasonable administrative, technical and physical data security practices to protect the confidentiality and integrity of the electronic system, and also use an electronic system that: (1) Encrypts data to safeguard the confidentiality and integrity of the information contained within the system; (2) Complies with all state and federal laws regarding patient confidentiality; (3) Limits the type of information and access to that information to the minimum necessary including disposing of such information once it is no longer

operationally necessary; (4) Is capable of providing safeguards against erasures and unauthorized changes in data after the information has been entered or verified by the licensee; and (5) Is capable of being reconstructed in the event of a computer malfunction or data destruction.

When conducting telehealth consultations, the hybrid retailer or dispensary facility should consider the following security protocols:

- Use encryption to protect mobile devices such as smartphones, laptops, and handheld devices.
- Use a secure internet connection with firewall protection.
- Install antivirus software on electronic devices.
- Plan for an unexpected event, have a back-up for data.
- Control who has access to PHI and telehealth using credentials, passwords, and two-factor authentication, such as a PIN code.
- Use strong passwords and change them frequently.
- Use a patient-friendly telehealth platform to limit confusion in navigating features to reduce risk of security breaches.
- Hold the telehealth visit in a private, enclosed room to minimize the risk that protected health information is overheard.
- Take steps to verify the identity of the qualifying patient or caregiver prior to the visit by having them share a government-issued ID and confirm their name, address, and device location.
- Avoid recording visits unless necessary. If visits are recorded, obtain consent in advance and store/transmit recordings securely.
- Educate qualifying patients and caregivers on privacy. Advise them to use a private space for telehealth visits and to maintain secure devices with strong passwords.

### **What are acceptable methods for telehealth consultations?**

Technology or methods used to facilitate telehealth consultations should meet state requirements as set forth in [section 19a-906 of the general statutes](#) which requires communication through real-time, interactive, two-way communication technology or technology capable of storing clinical information such as medical histories, images, or videos that can be sent electronically to another site for evaluation (“store and forward technology”). Facsimile, texting or email are not acceptable methods of telehealth consultations. **Please see specific examples of acceptable and unacceptable telehealth platform software in the question below.**

### **What are some acceptable and unacceptable examples of telehealth software platforms?**

Telehealth software programs must be both HIPAA-compliant and adhere to [DCP’s Policy and Procedure section 21a-421j-17](#) to protect the PHI the hybrid retailer or dispensary facility creates, receives, maintains, or transmits when providing telehealth care. The federal Department of

Human and Health Services provides examples of acceptable telehealth software programs which can be found here:

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

#### Examples of Acceptable Telehealth Software:

Zoom Workplace for Healthcare, Skype/Teams (with certain security add-ons), Doxy.me, Vsee, GotoMeeting and Google Meet.

#### Examples of Unacceptable Telehealth Software

Facebook Messenger, TikTok, Facebook Live, Twitch, or other public chat forums.

*Note: This list does not constitute an endorsement, certification, or recommendation of specific technology, software, applications, or products. There may be other technology vendors that offer HIPAA-compliant video communication products. The list is subject to change and not exhaustive.*

*Update: As the industry begins to identify the specific platforms that work for their businesses, the Department will maintain an updated list on the Department's website of approved platforms that will not require a case-by-case review. If you have specific questions about other platforms, please submit your request to [DCP.Cannabis@ct.gov](mailto:DCP.Cannabis@ct.gov).*

### **Is a private consultation space required in a hybrid retailer and a dispensary establishment?**

Yes, the hybrid retailer or dispensary facility establishment must have a private consultation space for pharmacists to meet in-person or virtually with qualifying patients and caregivers. A private consultation space is an area that is intended for or restricted to the use of a qualifying patient or caregiver that ensures confidentiality and protection of PHI. An example of an acceptable private consultation space would be a separate room designated for qualifying patient and caregiver consultations.

*Helpful Hint: Creating a Standard Operating Procedure document for the private consultation protocols can be a great way to ensure compliance.*

### **What type of notification must a hybrid retailer and dispensary facility give qualifying patients and hybrid retailers regarding telehealth consultations?**

Under state and federal telehealth laws, hybrid retailers and dispensary facilities must notify and obtain consent of patients to engage in telehealth. Additionally, under [Public Act 25-166](#), hybrid retailers and dispensary facilities are required to have a sign at their main entrance that is at least twelve inches in height and eighteen inches in width, with legible lettering stating the name of the licensed pharmacist available for either in-person or telehealth consultations. Hybrid retailers and dispensary facilities are also required to have signage at each register or point of sale location that

is at least eight inches in height and ten inches in width, with legible lettering stating, “Pharmacist available for consultation.” The same information should be posted on the hybrid retailer’s or and dispensary facility’s Internet web site.

**Note: telehealth does not require the recording of patients, and such act should only be performed if consented to by the patient in writing.**

*Update: The Department recommends that the above-required signage also include the following information: “If you have concerns that a licensed pharmacist is not readily available for a consultation, you may contact the Department of Consumer Protection by emailing [dcp.cannabis@ct.gov](mailto:dcp.cannabis@ct.gov) or calling (860) 713-6065.”*

### **What other state law requirements are applicable to telehealth consultations?**

[Section 19a-906 of the general statutes](#) provides Connecticut requirements relating to telehealth. Hybrid retailers and dispensary facilities should familiarize themselves with any applicable provisions, including provisions requiring patient consent to provide telehealth services. Additionally, other applicable provisions of state or federal law may apply, including but not limited to laws requiring equal access or disability accommodations. This guidance does not provide an exhaustive list and the failure to cite other statutory or regulatory provisions does not mean that those statutes or regulations would not apply. Hybrid retailers and dispensary facilities should review all aspects of legal and regulatory compliance. Should the hybrid retailer or dispensary facility have questions regarding the interpretation or applicability of such laws, consultation with private legal counsel is encouraged.

## **Remote Dispensing**

### **Remote Dispensing of Cannabis to Qualifying Patients and Caregivers**

#### **What does it mean to dispense?**

“Dispense” or “dispensing” means those acts of processing cannabis for delivery or for administration for a qualifying patient pursuant to a written certification. Dispense or dispensing includes the following:

- (1) comparing the directions on the label with the instructions on the written certification, if any, to determine accuracy;
- (2) the selection of the appropriate cannabis product from stock;
- (3) the affixing of a label to the container; and,
- (4) the provision of any instructions regarding the use of the marijuana.

Dispensing does not include the sales transaction or the act of selling the cannabis product to the qualifying patient or caregiver.

### **What is final verification?**

Final verification means the last review conducted by a pharmacist that: (1) is conducted to complete the dispensing process by verifying that the product to be dispensed conforms to the product ordered; and (2) includes, at a minimum, comparing, for accuracy, the original prescription, the contents of the prescription label and the selected cannabis product.

### **Who can perform final verification?**

Only a pharmacist with a dispensary license may perform final verification.

### **Who can dispense cannabis to qualifying patients and caregivers?**

Only a licensed pharmacist with a dispensary license can dispense cannabis to a qualifying patient or caregiver. However, a dispensary technician may assist in all acts of dispensing provided a pharmacist performs the final verification.

### **What is the role of the dispensary technician in remote dispensing?**

When performing remote dispensing, a dispensary technician at a hybrid retailer or a dispensary facility may assist in dispensing cannabis, as long as:

- (1) The dispensary technician remains under the remote supervision of a pharmacist; and
- (2) The pharmacist performs final verification to complete the dispensing process.

For example, a dispensary technician may compare label instructions with the certification, select the cannabis product from stock, label the cannabis product, and provide instructions as long as the pharmacist provides the final verification of the cannabis product.

### **Who can act as a dispensary technician?**

Any person that has held an active pharmacy technician registration in Connecticut within the five years prior to application can apply to the Department to become registered as a dispensary technician.

### **What does remote final verification look like? (*Updated*)**

Remote pharmacists should perform remote final verification in the same manner as they would in-person, exercising the same level of competence as if they were present. Audio-visual technology should be used to allow the remote pharmacist to communicate with the in-person dispensary technician working in concert to fill the order. The remote pharmacist must visually inspect all orders, labels, and dispensed cannabis products, in written, photographic or visual form, as appropriate, that can be captured on record. The remote dispensing record shall include: 1) order information, 2) the name, quantity and strength of each cannabis item being dispensed, 3) patient profile information, 4) picture of the label and the product itself, 5) caregiver information, if any, and 6) certifier instructions, if any. The remote final verification record should also include the name of the dispensary technician performing the dispensing within the establishment and the licensed pharmacist performing the remote final verification.

Additionally, when specific still photographic visuals are required for review, such as the cannabis product and its label, the visual technology employed should be of sufficient quality and resolution so the reviewing pharmacist can adequately examine all aspects and details of the cannabis product and its label, including the capability to provide multiple views of the label and cannabis product in a still photograph format.

*Note: This means that video recordings are permissible for verification as long as the video can produce a still image for the record that clearly presents all required information. If a video recording is used, it will be subject to the record keeping requirements of section [21a-421j-6 of DCP's Policies and Procedures](#) rather than the 30-day security video requirement, so ultimately keeping the record in still photographic form may be preferable.*

The remote dispensing record is subject to the record keeping requirements of section [21a-421j-6 of DCP's Policies and Procedures](#).

**Note: Remote Dispensing does not require the recording of patients, and such act should only be performed if consented to by the patient in writing.**

### **What technological security is required for remote final verification?**

Hybrid retailers and dispensary facilities should employ technologies that are both HIPAA-compliant and adhere to [section 21a-421j-17 of DCP's Policies and Procedures](#) to protect the PHI that the hybrid retailer or dispensary facility creates, receives, maintains, or transmits during the remote final verification process. This includes the use of encryption to protect mobile devices such as smartphones, laptops, and handheld devices, a secure internet connection with firewall protection, antivirus software on electronic devices, a data back-up process to restore any lost data, and the use of credentials, passwords, and two-step verification to control access to PHI.

## **What are some acceptable and unacceptable examples of a remote final verification process?**

### Acceptable Remote Final Verification Process

The use of an encrypted, password protected web-based application with store and forward technology for written records and visual images that also has an audio feature to allow the remote pharmacist to speak with on-site staff. Specific platform examples include Zoom Workplace for Healthcare, Skype/Teams (with certain security add-ons).

### Unacceptable Remote Final Verification Process

Calling the remote pharmacist on the telephone and asking for an audio-only final verification. Using unsecure technology such as Facebook Messenger or a personal cell phone to send images.

## **What are the requirements for prescription drug monitoring program entry for cannabis products dispensed to a qualifying patient through remote dispensing?**

Cannabis products dispensed to a qualifying patient using remote dispensing still must be recorded in the electronic prescription drug monitoring program within one hour after completion of the transaction. However, a dispensary technician may upload or access data in the prescription drug monitoring program provided the dispensary technician has been designated by the pharmacist and has received appropriate training. Hybrid retailers and dispensary facilities should review [section 21a-254\(j\)\(10\)\(C\) and \(D\) of the general statutes](#) for more information regarding designation and training. Automatic entry via an electronic program interface is also sufficient to meet this requirement.

## **What level of dispensary technician supervision is required by a remote pharmacist at a hybrid retailer and a dispensary facility? (i.e. Sec. 21a-421j-15 of the Policies and Procedures)**

Pharmacists are not required to be physically present in the hybrid retailer or dispensary facility to supervise dispensary technicians, but the pharmacist must still conduct remote oversight and perform final verification checks for the cannabis dispensed, as well as perform all other supervisory obligations set forth in [DCP's Policies and Procedures](#), including any training and quality assurance obligations.

## **Can pharmacists perform remote pharmacy work for multiple hybrid retailers or dispensary facilities at the same time?**

Yes, so long as the hybrid retailer or dispensary facility does so in a manner that ensures a pharmacist with a dispensary license (1) is readily available to provide telehealth consultations for qualifying patients and caregivers, (2) can conduct remote final verification properly, (3) the 1:3

ratio of pharmacists to dispensary technicians not exceeded, and (4) the pharmacist is properly licensed with each location.

**What other provisions are hybrid retailers and dispensary facilities required to comply with?**

Using a remote pharmacist for dispensing does not relieve a hybrid retailer or dispensary facility, pharmacist or dispensary technician of their obligations to comply with other applicable requirements in statutes and [Policies and Procedures](#), including but not limited to [sections 21a-421j-14 through 21](#) and recordkeeping requirements in [section 21a-421j-6\(a\) of DCP's Policies and Procedures](#).

For questions regarding this guidance or remote pharmacy work in general, contact DCP at [dcp.cannabis@ct.gov](mailto:dcp.cannabis@ct.gov).

## Update from September 29, 2025 Virtual Presentation on Remote Pharmacy:

### 1. The 8- and 20-hour requirements for Pharmacists:

A. 8-HOUR REQUIREMENT – If you are a hybrid retailer or dispensary facility, you need a pharmacist(s) in-person at the establishment for a minimum of 8 *consecutive* hours each calendar week. These eight (8) hours can even be split over two (2) days as long as the hours are sequential hours of operation.

Examples:

- Eight (8) different licensed pharmacists can each have 1 of 8 sequential 1-hour shifts;
- One (1) licensed pharmacist can work an 8-hour shift; or
- One (1) licensed pharmacist can work a 2-hour shift, followed immediately by another licensed pharmacist working a 6-hour shift.

B. 20-HOUR REQUIREMENT – If you are a hybrid retailer or dispensary facility that offers telehealth consultations, each licensed pharmacist that you employ to conduct such telehealth consultations must be employed by the specific entity that holds the license for that location, for at least 20 hours per calendar week. Unlike the 8-hour requirement, the 20-hour requirement for telehealth pharmacists must be met by each individual pharmacist performing telehealth consultations.

C. Overlap of the “Hours Requirements” – Any of the eight (8) on-site hours worked at a location can be counted toward the 20-hour requirement for that location’s licensee.

### 2. Record Keeping Requirements for Remote Dispensing: The auditable record required to be kept for each instance of remote dispensing includes:

- 1) Order information,
- 2) The name, quantity and strength of each cannabis item being dispensed,
- 3) Clear, still picture of all labels and each packaged cannabis product,
- 4) Attestation or evidence that the entire patient profile information was reviewed by the pharmacist,
- 5) Attestation or evidence that the caregiver information was reviewed by the pharmacist, if any,
- 6) Attestation or evidence that the certifier instructions were reviewed by the pharmacist, if any,
- 7) Name of the remote pharmacist, and
- 8) Name of the dispensary technician working with the remote pharmacist,
- 9) The date, time, and location of the dispensing.

The method and manner in which these above-referenced items of record are stored is a business decision so long as they can be promptly provided to the Department upon request in an auditable format, preferably electronic.

Note: If a pharmacist declines to dispense a medical order, such transaction is also subject to the record keeping requirements in Policy and Procedure Section 21a-421j-6.

- 3. Pharmacist to Dispensary Technician 1:3 Ratio:** One pharmacist can supervise up to three (3) dispensary technicians, regardless of where those dispensary technicians are located at time of supervision, to maintain this ratio.

Examples:

- One remote pharmacist can supervise two (2) dispensary technicians in one location, and one additional dispensary technician in another location.
- One on-site pharmacist can supervise one dispensary technician in-person at the same location, and two other dispensary technicians in another location.

Note: If the pharmacist overseeing the three (3) dispensary technicians is responsible for telehealth consultations, then that pharmacist must remain able to readily provide telehealth consultations for qualifying patients and caregivers in a private space with adequate telehealth communication technology.

- 4. Continuing Education Requirement:** Five (5) hours. The continuing education requirement will not be enforced for calendar year 2025. The five hours of continuing education will be required upon renewal of all Medical Marijuana Dispensary Licenses beginning in 2026. Information on how to report your compliance will be forthcoming.