



GUIDANCE – DISCOUNTS AND LOYALTY PROGRAMS

A dispensary may only offer discounts in accordance with a written discount policy that has been submitted to and approved by the Division of Cannabis Control (DCC or Division). Such policy must ensure the following:

1. Any discount offered is available to all patients registered as indigent or veteran.
2. If a discount is offered to a non-medical consumer, it must also be offered to all registered medical marijuana patients and caregivers.
3. A badged employee of any DCC cannabis licensee who is also a registered medical marijuana patient may be offered a discount as long as it does not exceed the discount offered to medical marijuana indigent or veteran patients. The employee must present their valid employee badge to receive the discount.
 - a. Note: Dispensary employees are prohibited from receiving rebates or discounts on cannabis offered by a cultivator, processor, or third-party entity.

Veterans

A discount may also be offered to non-medical consumers who are veterans at the same rate offered to medical marijuana patients registered as indigent or veteran. A discount offered to non-medical consumers who are veterans is not required to be offered to all patients or non-medical consumers.

A dispensary that chooses to provide a discount to veterans who are non-medical consumers may accept the following active/unexpired identification to evidence veteran status (this is not an exhaustive list):

1. Veterans Identification Card from the Department of Veterans Affairs;
2. Veterans Identification Card from an Ohio County Recorder;
3. VA Healthcare Enrollee Identification Card;
4. Department of Defense 100% VA Disabled Veteran or Dependent Identification Card;
5. Department of Defense Identification Card (active, retired, temporary disability retirement list);
6. DD214, DD215, or National Guard Bureau military discharge certificate indicating disposition of discharge showing the veteran status as honorable, general, general under honorable conditions, or discharged or released under conditions other than dishonorable; or
7. Report of separation from the National Archives National Personnel Records Center in St. Louis, Mo. showing the veteran status as honorable, general, general under honorable conditions, or discharged or released under conditions other than dishonorable.

A medical marijuana patient who also presents such identification evidencing their veteran status must be offered any discount available, regardless of whether or not veteran status is indicated on their medical marijuana registration.



Dispensaries must maintain records pursuant to Division rules including all sales records and all records related to advertising, and promotional and marketing materials. Additionally, sales receipts must include a description of any discount applied to the transaction.

It is the responsibility of the dispensary to ensure discounts are provided in compliance with this guidance and the dispensary's written discount policy and that appropriate identification requirements are met for patients and caregivers, veterans, and cannabis licensee badged employees.

Any new or updated discount policies must be submitted to the Division as a Change of Operations via the [DCC eLicense](#) portal.

Employees

Dispensaries may offer employee discounts only in the following ways:

1. Employees of licensed cannabis entities who are also registered patients may receive discounts if they present a valid employee badge, but the discount must not exceed that offered to indigent patients or veterans.
2. Employees who are not registered medical marijuana patients are required to purchase as non-medical consumers. Dispensaries may offer discounts to employees as a group of non-medical consumers, but when doing so must ensure the discount is offered to **all** registered medical marijuana patients and caregivers as well.

Dispensary employees are prohibited from receiving discounts or rebates from cultivators, processors, or third-party entities.

Receipts and Records

Dispensaries must maintain records pursuant to Division rules including all sales records and all records related to advertising, and promotional and marketing materials. Additionally, sales receipts must include a description of any discount applied to the transaction.

It is the responsibility of the dispensary to ensure discounts are provided in compliance with this guidance and the dispensary's written discount policy and that appropriate identification requirements are met for patients and caregivers, veterans, and cannabis licensee badged employees.

Any new or updated discount policies must be submitted to the Division as a Change of Operations via the [DCC eLicense](#) portal.

Loyalty Programs

Licensees may choose to offer "loyalty" or other similar programs. Any such program must be compliant with Division rules, this guidance, and a written policy adopted by the licensee and submitted to the Division for review and approval.

If a loyalty program is offered, the following must be included in the licensee's written policy:



- The customer must affirmatively authorize their participation in the program. This consent must include an acknowledgement that certain information is being collected and stored by the licensee, including the specific data points, and that this information is not transmitted to or stored by the State of Ohio.
- The customer must be permitted to withdraw their consent at any time. The customer must be provided with information upon initial authorization about their right to withdraw their consent at any time and how to do so.
 - Merchandise, paraphernalia, and otherwise approved non-cannabis items may be given away for free or at a discount.
 - No cannabis may be given away for free. Furthermore, no discount may be provided on cannabis for participation in or as an incentive of the loyalty program, because such discount would not be in compliance with the discount rule and this guidance.

Any licensee that wishes to offer a loyalty, or other similar program, must submit their written operating procedures to the Division along with a Change of Operations via the [DCC eLicense](#) portal.

Vendor-Sponsored Sales Commission Programs

The use of sales commission programs is prohibited and a violation of several Division rules. A sales commission program is defined as an additional payment or other compensation given to an employee in exchange for the sale of a particular product or brand line.

Beginning March 20, 2026, any licensee found to be using a sales commission program as described above will be subject to enforcement action by the Division. This enforcement may be taken against dispensaries who permit such programs incentivizing employees, as well as cultivators, processors, or testing labs who offer the incentives.

Vendors offering these types of programs are able to assist in supporting licensees' use of their platforms in a compliant manner. Other valid uses of the services offered by vendors, such as inventory tracking, industry events, distribution and the use of educational modules or business analytics are permissible.



Frequently Asked Questions

1. Can I give an unhappy patient or consumer a unique percentage off their purchase or a dispensary gift card for customer satisfaction?

No. Staff are not permitted to offer unique patient or consumer discounts on cannabis due to customer satisfaction. All discounts must be compliance with the guidance above. However, non- cannabis items (e.g., wearables, swag) may be provided at a discount or no cost.

2. Are staff who are purchasing medical marijuana permitted to “stack” employee discounts with veteran/indigent discounts?

No. An employee who is purchasing medical marijuana and also has veteran/indigent status may receive the discount that all veteran/indigent status patients are eligible for; however, staff are not permitted to receive a discount that exceeds the discount offered by a dispensary to patients with veteran or indigent status.

3. Is stacking discounts generally permissible?

Stacking discounts may be permissible as long as the total discount provided is not greater than what is permitted for the category. For example, patients may stack discounts as long as the end result is not a discount greater than what is available to indigent patients and veterans. Or, a non-medical consumer may stack discounts as long as the end result is not a discount greater than what is available to all medical patients and caregivers.

4. Can staff who are patients and purchasing medical marijuana combine the price reduction of the day and an employee discount?

Yes. Staff are permitted to receive a combined discount of the price reduction of the day and the employee discount, only if the discount of the day is also offered to patients with veteran or indigent status, and the employee discount does not exceed the discount offered by the dispensary to patients with veteran or indigent status.

5. Can a registered caregiver or non-medical consumer purchase on behalf of a patient who is an employee and receive the employee discount?

No. Employees are required to make their own purchases and present their active employee badge at the time of each purchase. The employee discount can only be applied to medical marijuana purchased for the employee’s own use.

6. Does the employee have to bring their employee badge each time to the dispensary offering employee discounts, even if the company knows the individual is a currently employed at another dispensary?

Yes. A medical marijuana patient who is an employee is required to have their active employee badge with them each time they wish to purchase medical marijuana and receive an employee discount.

7. If I’m only a caregiver, and not a patient, can I use my employee discount to purchase medical marijuana for my registered patient?



No. An employee who is a caregiver only is not permitted to purchase medical marijuana and receive an employee discount.

8. Can I use my medical marijuana employee discount to purchase medical marijuana and then provide it to another patient or individual?

No. A patient/employee who purchases medical marijuana and receives an employee discount, and then provides the medical marijuana to another person with the intent to pass along the discount, is in violation of Ohio Revised Code [2925.22](#), Deception to Obtain a Dangerous Drug, and [2925.03](#), Drug Trafficking.

9. Can a dispensary opt to only give the employee discount to their company employees?

No. If a dispensary opts to offer a medical marijuana employee discount, the discount must be provided to all employees within the MMCP, which include dispensaries, cultivators, processors, and testing laboratories.

10. Can a dispensary set separate discount rates for its own employees?

Yes. A dispensary may set two employee discount rates, one for all badged employees and one specifically for the dispensary's badged employees, but neither rate may exceed the discount offered by the dispensary to patients with veteran or indigent status.

11. Can a dispensary give discounts on specific brands?

Yes, so long as the discount is offered in accordance with this guidance and Division rules.

12. I am a cultivator or processor, can I offer a loyalty program?

Yes. Cultivators and processors may offer a loyalty program in compliance with Division rules and this guidance. As a reminder, you may not give away cannabis for free, and you may not discount cannabis for participation in or as an incentive of the loyalty program (i.e., no "manufacturer discounts").



Discounts Visual

Discounts may only be provided as permitted by O.A.C. [1301:18-8-11](#) and explained in this guidance. The Division is providing the below visual to help with understanding these requirements.

Tier 1: Indigent and Veteran Patients* must receive the highest discount rate offered by the dispensary.

*Non-medical veterans and employees who are medical marijuana patients are eligible to receive up to the same rate.

Tier 2: Medical Marijuana Patients and Caregivers: next, any discount offered to a medical marijuana patient or caregiver or any non-medical consumer must be offered to **all medical marijuana patients and caregivers***.

*Employees who are not medical marijuana patients are eligible to receive a discount, but it cannot exceed that offered to Tier 2.

Tier 3: Non-medical consumers: a dispensary may choose to offer a discount to any non-medical consumer. The discount does not have to be offered to all non-medical consumers, but it may be no more than what is offered to all medical marijuana patients and caregivers. This includes discounts offered to non-medical employees.