

DCC GUIDANCE – Employee Training

Pursuant to Ohio Revised Code (O.R.C.) <u>3780.03</u>(C)(16), the Division of Cannabis Control (DCC or Division) is required to establish training requirements for cannabis entity employees. Therefore, the Division has promulgated Ohio Administrative Code (O.A.C.) <u>1301:18-3-10</u>, effective January 1, 2026, which requires each licensee to establish and oversee an employee training program.

All Facility Employees

The rule requires each employee to complete foundational training in the following subjects prior to commencing business:

- 1. All written policies and procedures associated with the employee's assigned function(s);
- 2. Use and proper documentation of all cannabis maintained at the licensed premises in Metrc;
- 3. Preparation for regulatory inspections;
- 4. Requirements for maintaining an active employee badge pursuant to O.A.C. 1301:18-3-09;
- 5. Applicable statutes and regulations pertaining to Ohio cannabis law; and
- 6. Responsible use training, which includes:
 - a. Recognizing signs and symptoms of substance abuse; and
 - b. Reporting of adverse events from cannabis use to the Cannabis Service Center at 1-833-464-6627.

Additionally, each facility must ensure that, prior to gaining access to the designated security and surveillance area or conducting any security or surveillance function, each authorized registered employee successfully completes the Ohio Homeland Security Private Investigator and Security Guard (PISGS) training found here: https://homelandsecurity.ohio.gov/private-investigators-and-security-guards/training-opportunities/online-training.

Cultivators & Processors Only

- 1. Occupational Safety and Health Administration (OSHA) Training: Each **cultivator and processor** must ensure that either:
 - a. At least one registered Responsible Party or other person in a safety supervisory or managerial role completes the <u>30-hour OSHA General</u> <u>Industry Training Course</u>; or



- b. The licensee maintains a contract with a third-party OSHA safety consultant approved by the Division to provide all registered employees regular trainings and safety audits.
 - The Division will consider degrees, certifications, or training related to occupational health and safety when reviewing proposed thirdparty safety consultants.
 - ii. To request approval for use of a third-party safety consultant, contact the Cannabis Service Center (CSC) via the CSC Licensee Portal or by emailing DCCCompliance@com.ohio.gov with the subject line "[DCC License Number] - [Licensee Business Name] - OSHA Approval Request."

Processors Only

- 2. Certified Food Protection Manager: Each processor must ensure that at least one employee is available during all operating hours when cannabis products are prepared or packaged. This person must be a certified Food Safety Manger through a <u>provider accepted</u> by the Ohio Department of Health (ODH), or a nationally recognized accrediting agency as approved by the Division.
 - a. To request approval for use of a provider not on the ODH list, contact the CSC via the CSC Licensee Portal or by emailing <u>DCCCompliance@com.ohio.gov</u> with the subject line "[DCC License Number] - [Licensee Business Name] - Food Protection Provider Request."
- 3. Extraction Supervisor: Each processor using hydrocarbon solvent-based or carbon dioxide extraction methods must designate at least one badged employee to train and supervise employees engaged in extracting cannabis, producing cannabis products, or handling such products on the proper, sanitary, and safe use of extraction equipment and solvents. The supervisor must meet the following minimum qualifications:
 - a. A bachelor's degree in engineering or physical sciences from an accredited university; or
 - b. At least three years of experience operating the same or similar processing and extraction equipment utilized at the facility.

Dispensaries Only

4. Dispensary Patient Registry & OARRS: Prior to commencing business, all dispensary employees with access to confidential patient information or the

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Medical Marijuana Control Program Patient & Caregiver Registry must receive foundational training regarding confidentiality requirements pursuant to O.A.C. 1301:18-8-07.

Additionally, prior to dispensing cannabis, all dispensary employees must receive the following training:

- Relevant registration and training on the <u>Prescription Monitoring Program</u>
 (<u>PMP</u>) and <u>Ohio Automated Rx Reporting System (OARRS)</u> established
 pursuant to O.R.C. 4729.75;
- b. Instruction on the different forms and methods of administration available pursuant to O.R.C. <u>3780.04</u> and <u>3796.06</u>;
- c. Instruction on qualifying conditions for medical cannabis patients;
- d. Authorized uses of medical cannabis in the treatment of qualifying conditions;
- e. Guidelines for providing information to patients and caregivers related to patients' symptoms and risks associated with medical cannabis, including possible drug interactions; and
- f. Guidelines for refusing to provide cannabis to an individual who appears to be impaired or abusing cannabis.

Training Material Updates & Providing Regular Training

For the required foundational training listed above, each licensee is to ensure that the training materials are reviewed at least once per calendar year and updated as necessary and appropriate. Additionally, each licensee must ensure that all employees regularly receive training, which includes, but may not be limited to, any updates to training materials.

Each licensee will be required to affirm on their renewal application that all required training has been completed and training materials reviewed and updated as necessary.

It is the responsibility of each licensee to ensure compliance with this rule. Unless specific training content or materials is otherwise prescribed, licensees may independently develop content where appropriate or work with a qualified third-party. Licensees are **not** required to submit training materials to the Division for prior review and approval.

Documenting & Maintaining Training Records

Each licensee must document on the Employee <u>Training Record Form</u> all training completed and include the following:

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- 1. Names and qualifications of the person responsible for training content;
- 2. A set of training materials to be provided to each participant, including the training element related to a specific rule requirement;
- 3. The names of all employees who received the training;
- 4. Any certificates of completion provided; and
- 5. Date(s) of training.

Licensees do not need to submit these forms or records to the Division; however, they must be retained for two years pursuant to O.A.C. <u>1301:18-3-14(B)(6)</u>. Training records will be reviewed during each licensee's Certificate of Operation inspection and renewal inspection.

The Division understands a set of the training materials may not be available to the licensee for PISGS, OSHA, or food safety certifications. In that case, the remaining records must be retained. Additionally, this information is not required to comply with the extraction supervisor education/experience requirements; however, the licensee must maintain records evidencing that the extraction supervisor meets the educational and/or experience requirements (e.g., degree, resume).

Helpful resources and materials can be found on the Division's website <u>here</u>. The Division will update these materials as necessary. All questions must be directed to the CSC via the CSC Licensee Portal or by emailing DCCLicensing@com.ohio.gov.

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