



OFFICE OF
MEDICAL CANNABIS

Business Licensees
Employee Required Annual Trainings



This is the employee required annual training for licensed medical cannabis dispensaries in the Commonwealth.

This training is required for the employees and agents of medical cannabis businesses licensed by the Office to operate in the Commonwealth of Kentucky.

As the Director of the Division of Enforcement and Compliance within the Kentucky Office of Medical Cannabis, I want to first thank you for your participation and commitment as a business licensee within Kentucky's medical cannabis program. The program relies on your services and success to ensure registered medical cannabis patients and caregivers have access to safe and quality products.

Next, I want to stress the importance of workplace safety as you conduct business across the Commonwealth. The regulatory requirements provided in this training are not just to ensure the safety and quality of products for patients, but also to ensure that your employees and the community in which you operate are also safe, secure, and protected.

For those reasons, our administrative regulation regarding licensing requires employees, contracted agents, and volunteers who have direct contact with cardholders or physically handle medical cannabis on behalf of a business licensee to complete the applicable training or trainings provided by the Office for their respective license type.

Additionally, each licensee must also provide a hard copy of the Enforcement and Compliance Guide for Medical Cannabis Businesses available for download and print on our website under the "Business Resources" page. On this page you will also find materials with summaries on how to properly secure your facility, transport, advertise, test, or package and label medical cannabis in the state.

And most importantly, licensees should be sure to review and familiarize themselves with the law and regulations set forth for all medical cannabis businesses.

Again, thank you for your service to our Program and we look forward to working with you.



Sincerely,

A handwritten signature in blue ink that reads "Chafic George".

Chafic George
Enforcement and Compliance Director
Kentucky Office of Medical Cannabis

Employee Required Annual Trainings



Dispensary Facility

Annual Training required by 915 KAR 1:020, Section 5(4)

As required by **915 KAR 1:020, Section 5(4)**, all licensed medical cannabis dispensaries must complete this training. Specifically, every principal, agent, employee, and volunteer of a licensee who has direct contact with cardholders, or physically handles cannabis seeds, seedlings, tissue cultures, clones, mature cannabis plants, medical cannabis, or medical cannabis products, shall complete applicable training required by the cabinet, which may include trainings for cultivating, processing, testing, and retail sale of medical cannabis and usage of the commonwealth's designated electronic monitoring system and seed to sale tracking system required by **KRS 218B.140**.

What will this training cover?

Dispensary



- Track and Trace Requirements
- Overview of METRC
- Testing Requirements
- Product Limitations
- Transporting Medical Cannabis & Transportation Manifests
- Medical Cannabis Waste
- Visitor Requirements
- Notifiable Events
- ID Verification
- Intoxication Identification
- Worker Safety
- Minimum Performance Standards

Here is what this training will cover:

- Track and trace requirements;
- Overview of METRC;
- Testing requirements;
- Product limitations;
- Transporting medical cannabis & transport manifest;
- Medical cannabis waste;
- Visitor requirements;
- Notifiable events;
- ID Verification;
- Intoxication identification;
- Worker safety; and
- Minimum Performance Standards.

Understanding Track and Trace Requirements

A dispensary shall use the electronic monitoring system and seed to sale tracking system prescribed by the cabinet containing the requirements in KRS Chapter 218B, specifically **KRS 218B.140**, and in accordance with written instructions provided by the cabinet. See **915 KAR 1:070 Section 12(1)**.

A dispensary shall establish inventory controls and procedures to conduct inventory reviews at its facility and ensure its inventory is ***accurate in real-time*** in the commonwealth's designated electronic monitoring system and seed to sale tracking system. See **915 KAR 1:070 Section 12(2)**.



The required track and trace system for all medicinal cannabis licensees in Kentucky is **METRC**.

Administrative Regulation **915 KAR 1:070 Section 12(1)** requires that a dispensary shall use the electronic monitoring system and seed to sale tracking system prescribed by the cabinet containing the requirements in KRS Chapter 218B, specifically **KRS 218B.140**, and in accordance with written instructions provided by the cabinet.

A dispensary shall establish inventory controls and procedures to conduct inventory reviews at its facility and ensure its inventory is accurate in real-time in the commonwealths' designated electronic monitoring system and seed to sale tracking system.

To stress that again, inventory must be accurate in real-time.

The required electronic monitoring system and seed to sale tracking system for all medical cannabis licensees in Kentucky is METRC.



About METRC

- METRC enables licensees and the Office of Medical Cannabis to track medical cannabis from the seed where it originated all the way through to the sale of a finished good to a medical cannabis cardholder.
- METRC has the ability to provide authorized users the current amount, location, and stage of the product life cycle the medical cannabis is currently in.
- A licensee is required to ensure that the information in METRC accurately reflects its inventory at all times.
- **REMINDER:** All medical cannabis seeds, seedlings, clones, plants, materials, products, and waste **MUST** be tracked in METRC.



METRC enables the licensees and Office of Medical Cannabis to track medical cannabis from the seed it originated all the way through to the sale of a finished good to a qualified cardholder.

Among other features, METRC provides authorized users the current amount, location, and which stage of the product life cycle the medical cannabis is currently at in real time.

A licensee is required to ensure that METRC accurately reflects their inventory at all times.

Reminder: All medical cannabis material, seeds, seedlings, clones, plants, materials, products and waste MUST be tracked in METRC.

Regardless of the product type or what stage of the process it is in, if it is medical cannabis, it needs to be tracked in METRC.



Example of an Inventory Compliance Failure

A licensee is required to ensure that METRC accurately reflects their inventory at all times.

→ **Example: Licensee has 15, 1/8th units of blue dream raw plant material in the back of house vault, but METRC shows the number of units remaining is 17 and located in the picking room.**

⊘ *The licensee is **out of compliance** because:*

- The number of units available is not accurately reflected in METRC; and
 - The physical location of the product does not align with the digital location specified in METRC.
- If these discrepancies were discovered during an inspection, investigation, or audit, the Division of Enforcement and Compliance may:
 - Issue a Notice of Corrective Action to the licensee for failure to accurately track inventory;
 - Further investigate the product unit discrepancy; and
 - Issue any additional enforcement action as necessary

A licensee is required to ensure that METRC accurately reflects their inventory at all times. If it does not, then the licensee is not in compliance.

Let's take a look at an inventory compliance failure:

- A licensee has 15, 1/8th units of blue dream raw plant material in the back of house vault, but METRC shows the number of units remaining is 17 and located in the picking room.
 - The licensee is out of compliance because the number of units available is not accurately reflected in METRC and the physical location of the product does not align with its digital location within METRC.

If these discrepancies were discovered during an inspection, investigation, or audit, the Office of Medical Cannabis's Division of Enforcement and Compliance may, for example:

- Issue a Notice of Corrective Action to the licensee for failure to accurately track inventory and further investigate the product weight discrepancy as needed, which may result in issuing additional enforcement actions.



About METRC: *Tracking Inventory*

There are **two (2) types of tags** used for medicinal cannabis inventory in METRC:

Plants

Packages

As a dispensary, you will be handling products with PACKAGE tags.

Each type of tag contains the following information:

- Facility name
- Facility license number
- 24-digit unique identification number (UID)
- Tag order date
- Designation whether the item is MEDICAL or ADULT USE
 - **REMINDER:** *Kentucky is a MEDICAL ONLY state. If you see an ADULT USE tag, contact your compliance department immediately.*



There are two (2) types of tagged medical cannabis inventory in Metrc: PLANTS and PACKAGES

As a dispensary, you will be handling products with package tags.

Each tag contains the following information:

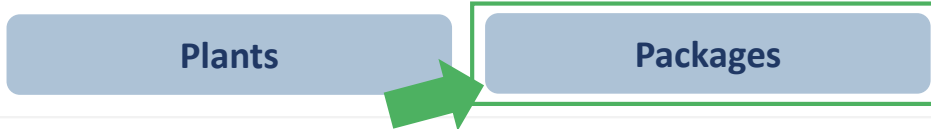
- Facility name;
- Facility license number;
- 24-digit unique identification number (UID);
- Tag order date;
- and the designation whether the item is MEDICAL or ADULT USE

Reminder: Kentucky is a Medical only State. If you see an Adult use tag in your facility, contact your compliance department immediately.



About METRC: *Tracking Inventory*

There are **two (2) types of tags** used for medicinal cannabis inventory in METRC:



About METRC: *Package Tags*

- Package tags are assigned post-harvest and are used to track medical cannabis packages and finished products
- Package tags record the entire history of the inventory batch, including:
 - Testing
 - Transfers
 - Adjustments
 - Package creation
- Each package, that has a tag applied, contains ONE TYPE OF PRODUCT



Package tags are assigned post-harvest and are used to track medical cannabis packages and finished products.

Package tags record the entire history of the inventory batch, including:

- Testing;
- Transfers;
- Adjustments; and
- Package creation.

Each package that has a tag applied contains one type of product.



About METRC: *Tracking Inventory*

There are **two (2) types of tags** used for medicinal cannabis inventory in METRC:



About METRC: *Package Tags*

- Package tags are DIFFERENT from Plant tags

Package tags are a perforated sticker with a top and bottom portion

The UID is printed on both portions of the package tag



The larger (or top portion) stays with the package and the smaller (or bottom portion) can be attached to an auxiliary container or to manifest paperwork



Package tags are different from plant tags. Package tags are a perforated sticker with a top and bottom portion.

The unique identification number is printed on both portions of the package tag.

The larger area, or top portion, stays with the package and the smaller area, or bottom portion, can be attached to an auxiliary container or to manifest paperwork.

Again, each package that has a tag applied will contain one type of product.

Product Limitations

915 KAR 1:070, Section 1(3): A dispensary shall:

- ⊘ **Not** sell or dispense medicinal cannabis products **intended for consumption by vaporizing** to a cardholder who is younger than twenty-one (21) years of age or to a designated caregiver for a registered, qualified patient who is younger than twenty-one (21) years of age. See **915 KAR 1:070, Section 1(3)(c)**.
- ⊘ **Not** acquire, possess, dispense, sell, offer for sale, transfer, or transport:
 - (1) Raw plant material with a delta-9 tetrahydrocannabinol (THC) content of more than thirty-five percent (35%);
 - (2) Medicinal cannabis products intended for oral consumption as an edible, oil, or tincture with more than ten (10) milligrams of THC per serving;
 - (3) Any medicinal cannabis product not otherwise described in this provision with a THC content of more than seventy percent (70%); or
 - (4) Any medicinal cannabis product that contains vitamin E acetate
- ✓ Only dispense or sell medicinal cannabis that has passed the testing requirements contained in **915 KAR 1:110** per **915 KAR 1:070 Section 1(3)(h)**.

Per 915 KAR 1:070 Section 1(3), a dispensary shall:

Not sell or dispense medical cannabis products intended for consumption by vaporizing to a cardholder who is younger than twenty-one years of age or to a designated caregiver for a registered, qualified patient who is younger than twenty-one years of age.

Not acquire, possess, dispense, sell, offer for sale, transfer, or transport:

- Raw plant material with a delta-9 tetrahydrocannabinol (THC) content of more than thirty-five percent
- Medical cannabis products intended for oral consumption as an edible, oil, or tincture with more than ten milligrams of THC per serving;
- Any medical cannabis product not otherwise described in this provision with a THC content of more than seventy percent or
- Any medical cannabis product that contains vitamin E acetate

Only dispense or sell medical cannabis that has passed the testing requirements contained in 915 KAR 1:110.

Transporting Medical Cannabis

Where and to whom can you transport medical cannabis?

- **915 KAR 1:080, Section 1 (1)**: A cannabis business shall ONLY transport medical cannabis, including seeds, seedlings, and plants, to other cannabis businesses.
 - ↳ **NOTE**: Dispensaries may operate a delivery service for registered patients and caregivers.

What do you need to transport medical cannabis?

- A vehicle that meets the requirements specified in **915 KAR 1:080, Section 1(1)**
- A delivery driver shall:
 - Have access to a secure form of communication
 - Conspicuously wear an employee identification badge at all times during the transport of medical cannabis
 - Have a valid driver's license
 - NOT wear any clothing or symbols that may indicate ownership or possession of medicinal cannabis
 - ↳ **NOTE**: THIS IS FOR YOUR PROTECTION
- A copy of the cannabis business license for the business transporting the medicinal cannabis
- A METRC Transportation Manifest

Where and to whom can you transport medical cannabis?

Per 915 KAR 1:080 Section 1(1) a cannabis business shall only transport medical cannabis, including seeds, seedlings, and plants to other licensed cannabis businesses.

This means you cannot transport medical cannabis to a qualified cardholder directly. Medical cannabis must go to a licensed medical cannabis business.

What do you need to transport medical cannabis?

- A vehicle that meets the requirements laid out in **915 KAR 1:080 Section 1(1)**
- A delivery driver who shall:
 - Have access to a secure form of communication
 - Conspicuously wear an employee identification badge at all times during transport of medical cannabis
 - Have a valid driver's license;
 - Not wear any clothing or symbols that may indicate possession of medical cannabis
- These requirements are to ensure your safety.
 - You will also need a copy of the cannabis business license for the business transporting the medical cannabis and
 - A METRC transportation manifest.

Transporting Medical Cannabis

Delivery services provided by dispensaries

915 KAR 1:080, Section 2: Provides the requirements for a dispensary to offer delivery services for registered qualified patients and designated caregivers.

Key points for delivery:

- A dispensary must follow all requirements for dispensing and selling medical cannabis to registered qualified patients and designated caregivers in accordance with KRS Chapter 1 218B and 915 KAR 1:070 prior to delivery
- Delivery must be accomplished on the date agreed upon by the dispensary and the registered qualified patient or designated caregiver
- Delivery must occur between the hours of 7:00am and 9:00pm
- Prepare a delivery manifest for each delivery
- Prepare a receipt for each delivery containing the following information:
 - 1) The dispensary's name, address, and license number
 - 2) The name and address of the registered qualified patient or designated caregiver;
 - 3) The date the medical cannabis was dispensed;
 - 4) The form and the quantity of medicinal cannabis dispensed;
 - 5) Any medical cannabis accessories or education materials included in the delivery order; and
 - 6) The amount paid by the registered qualified patient or designated caregiver for the medical cannabis and other items
- At the time of delivery, check the registry identification card of the registered qualified patient or designated caregiver to verify the person accepting delivery is the same person who placed the order. The registered qualified patient or designated caregiver who placed the order shall sign the receipt to confirm receipt of all items delivered and receive a copy of the receipt.
- Only deliver medical cannabis, medicinal cannabis accessories, and educational material to the Kentucky address identified for the individual in the Commonwealth's designated electronic monitoring system



Administrative regulation 915 KAR 1:080 Section 2 provides the requirements for a dispensary to offer delivery services for registered qualified patients and designated caregivers. Key points for delivery:

- A dispensary must follow all requirements for dispensing and selling medical cannabis to registered qualified patients and designated caregivers in accordance with KRS Chapter 218B and 915 KAR 1:070 prior to delivery
- Delivery must be accomplished on the date agreed upon by the dispensary and the registered qualified patient or designated caregiver
- Delivery must occur between the hours of 7:00am and 9:00pm
- Prepare a delivery manifest for each delivery
- Prepare a receipt for each delivery containing the following information:
 - The dispensary's name, address, and license number
 - The name and address of the registered qualified patient or designated caregiver;
 - The date the medical cannabis was dispensed;
 - The form and the quantity of medical cannabis dispensed;
 - Any medical cannabis accessories or education materials included in the delivery order; and
 - The amount paid by the registered qualified patient or designated caregiver for the medical cannabis and other items
- At the time of delivery, check the registry identification card of the registered qualified patient or designated caregiver to verify the person accepting delivery is the same person who placed the order. The registered qualified patient or designated caregiver who placed the order shall sign the receipt to confirm receipt of all items delivered and must receive a copy of the receipt.
- Only deliver medical cannabis, medical cannabis accessories, and educational material to the Kentucky address identified for the individual in the Commonwealth's designated electronic monitoring system
- Only registered qualified patients and their designated caregivers that are residents of Kentucky can access home delivery.

Medical Cannabis Waste

- **915 KAR 1:070, Section 14** governs the management, recording, and disposal of **medical cannabis waste**.
- Medical cannabis can be wasted via controlled **incineration** or by **grinding**.
 - If a licensee chooses to **grind** waste, the licensee MUST incorporate one or more non-consumable, solid wastes and make sure that the resulting mixture is majority non-cannabis waste after the grinding process.
 - **915 KAR 1:001, Section 1(17)** provides the definition for “controlled **incineration**.”
- Licensees are required to track medical cannabis waste in METRC and on a separate waste log.

915 KAR 1:070 Section 14 governs the management, recording and disposal of medical cannabis waste.

Medical cannabis can be wasted via controlled incineration or by grinding.

- If a licensee chooses to grind waste, the licensee must incorporate one or more non-consumable, solid wastes – such as paper, cardboard, or food waste – and make sure that the resulting mixture is majority non-cannabis waste after the grinding process.
- If you choose to conduct waste via controlled incineration, please make sure to thoroughly read the definition of “controlled incineration” to ensure it is done properly and safely. **915 KAR 1:001 Section 1(17)** provides the definition for controlled incineration. You can reach out to your investigator if you have questions.

Licensees are required to track medical cannabis waste in Metrc and on a separate waste log.

Medical Cannabis Waste

What information must be on the waste log?

- **915 KAR 1:070, Section 14(4)**: A minimum of two (2) employees shall oversee the disposal of medical cannabis and shall maintain and make available a separate record of every disposal indicating:
 - (a) The date and time of disposal;
 - (b) The manner of disposal;
 - (c) The unique identification codes associated with the medicinal cannabis scheduled for destruction;
 - (d) The reasoning for and description of the disposal;
 - (e) The names, employee identification numbers, and signatures of the TWO (2) employees overseeing the disposal of the medicinal cannabis; and
 - (f) If the medical cannabis waste for disposal contains plant material that was prepared for sale to a dispensary or processor, the harvest or production batch number, strain, volume, number of units if applicable, and weight of the medical cannabis being disposed.

915 KAR 1:070 Section 14(4) states that a minimum of two (2) employees shall oversee the disposal of medical cannabis and shall maintain and make available a separate record of every disposal indicating:

- The date and time of disposal;
- The manner of disposal;
- Any unique identification codes associated with the medical cannabis scheduled for destruction;
- The reasoning for and description of the disposal;
- The names, employee identification numbers, and signatures of the employees overseeing the disposal of the medical cannabis; and
- If the medical cannabis waste for disposal contains plant material that was prepared for sale to a dispensary or processor, the harvest or production batch number, strain, volume, weight, and number of units if applicable of the medical cannabis being disposed of.

Medical Cannabis Waste

Key takeaways of medical cannabis waste

915 KAR 1:070, Section 14(2)(a) and (b): Medical cannabis shall be rendered unusable by controlled incineration or by grinding and incorporating solid (non-cannabis waste) such that the resulting mixture is majority non-cannabis.

- **915 KAR 1:070, Section 14(3)** requires that the entire waste procedure, from destruction to the dumpster, shall be performed under video surveillance.
- **915 KAR 1:070, Section 14(4)** requires two (2) employees to perform waste procedures.
- **915 KAR 1:070, Section 14(1)** requires waste to be recorded in METRC and on a separate waste log per **915 KAR 1:070, Section 14(4)**.

When handling medical cannabis waste, here are some key takeaways to consider:

- Medical cannabis shall be rendered unusable by controlled incineration or by grinding and incorporating solid (non-cannabis waste) such that the resulting mixture is majority non-cannabis.
- The entire waste procedure, from destruction to the dumpster, shall be performed under video surveillance.
- A minimum of two employees shall participate in waste procedures.
- Waste shall be recorded in METRC and on a separate waste log.

Visitors and Visitor Log Requirements

Anytime an individual arrives at a medical cannabis dispensary seeking access to a limited access area and is not a badged employee, that individual is required to be entered into the licensee's visitor log (excluding emergency personnel and Office of Medical Cannabis staff).

↳ **915 KAR 1:070, Section 10** governs visitor access to limited access areas at a licensed dispensary.

A dispensary shall require visitors requiring access to a limited access area in the dispensary's facility to:

- Sign a visitor log upon entering and leaving the limited access area and detail the need for entry (**WHY ARE THEY THERE**)
- Check the visitor's government-issued identification to verify the visitor's age and that the name on the identification provided matches the name in the visitor log
- Issue a visitor identification with the visitor's name and company, if applicable and a badge number
- Escort the visitor while the visitor is at the dispensary location
- Ensure that the visitor does not touch any medicinal cannabis.

Let's discuss how to handle visitors at your facility that are there in a capacity other than as a purchasing cardholder.

Anytime an individual arrives at a medical cannabis processor facility seeking access to a limited access area and is not a badged employee, that individual is required to be entered into the licensee's visitor log. This requirement does not apply to emergency personnel or Office of Medical Cannabis staff.

915 KAR 1:070, Section 10 governs visitor access to limited access areas at a licensed dispensary.

A dispensary shall require visitors requiring access to a limited access area in the dispensary's facility to:

- Sign a visitor log upon entering and leaving the limited access area and detail the need for entry
- Check the visitor's government-issued identification to verify the visitor's age and that the name on the identification provided matches the name in the visitor log.
- Issue a visitor identification with the visitor's name and company, if applicable, and a badge number.
- Escort the visitor while the visitor is at the dispensary location.
- Ensure that the visitor does not touch any medical cannabis.

Visitor and Visitor Log Requirements:

Visitor logging and recording

Visitor logs must be maintained for five (5) years and available to the cabinet, law, enforcement, and other federal or state government officials upon request to perform the government officials' functions and duties. **915 KAR 1:070 Section 10.**

📝 The **visitor log** is required to capture the following information:

- Date
- Full name of each visitor
- Visitor identification badge number
- Time of arrival
- Time of departure
- Purpose of the visit

🚫 No one **under the age of 18** allowed onsite.

Visitor logs must be maintained for five years and available to the cabinet, law enforcement, and other federal or state government officials upon request to perform the government officials' functions and duties.

The visitor log is required to capture the following information about the visitor:

- Date;
- Full name of each visitor;
- The visitor identification badge provided by the licensee;
- The time of arrival;
- The time of departure;
- The purpose of the visit.

Please make sure all the information is filled out.

No one under the age of 18 is allowed onsite.

Notifiable Events

What is a notifiable event?

A **notifiable event** is the occurrence of an event that requires immediate notification (or no later than 24 hours from the occurrence) to the Office of Medical Cannabis.

↳ **915 KAR 1:020, Section 5(2)**: Duty to Report

(b) During the licensure period, a licensee shall notify the cabinet following knowledge or discovery of the following events:

- (1) Inventory discrepancies;
- (2) Diversion, theft, or loss of any medical cannabis or medical cannabis product;
- (3) Unauthorized destruction of medical cannabis;
- (4) Any criminal proceeding involving the licensee's owners, principal officers, board members, employees, volunteers, financial backers, or agents arising out of actions taken on the licensee's premises or while using licensee property;
- (5) Security alarm activation or other event that requires responses by law enforcement or security personnel;
- (6) Any loss, unauthorized or other event that requires responses by law enforcement or security personnel;
- (7) Accidents involving transport vehicles that occur while the licensee is transporting or delivering medical cannabis;
- (8) Any act involving cultivating, processing, producing, testing, transporting, or dispensing medical cannabis by any person that may create a health or safety risk to cardholders or the general public;
- (9) A dispensary declines the sale of medical cannabis to a cardholder; and
- (10) A dispensary desires to prohibit a cardholder from entering its premises.

During operations, you may experience a notifiable event.

A notifiable event is the occurrence of an adverse event that requires immediate notification, or notification within 24 hours from the occurrence, to the Office of Medical Cannabis.

Events, according to **915 KAR 1:020 Section 5(2)(b)**, that are deemed notifiable events are:

- (1) Inventory discrepancies;
- (2) Diversion, theft, or loss of any medical cannabis or medical cannabis product;
- (3) Unauthorized destruction of medical cannabis;
- (4) Any criminal proceeding involving the licensee's owners, principal officers, board members, employees, volunteers, financial backers, or agents arising out of actions taken on the licensee's premises or while using licensee property;
- (5) Security alarm activation or other event that requires responses by law enforcement or security personnel;
- (6) Any loss, unauthorized or other event that requires responses by law enforcement or security personnel;
- (7) Accidents involving transport vehicles that occur while the licensee is transporting or delivering medical cannabis;
- (8) Any act involving cultivating, processing, producing, testing, transporting, or dispensing medical cannabis by any person that may create a health or safety risk to cardholders or the general public;

- (9) A dispensary declines the sale of medical cannabis to a cardholder; and
- (10) A dispensary desires to prohibit a cardholder from entering its premises.

Notifiable Events

Notifiable event form

915 KAR 1:020, Section 5(2)(c) requires that notifications to be:

- Provided on a form prescribed by the cabinet and available on the website of the Office of Medical Cannabis, kymedcan.ky.gov, or through the business licensing portal, that includes time and date of the event, individuals involved, and a detailed description of the event.
- Sent via electronic mail to kymedcanreporting@ky.gov or submitted through the business licensing portal within twenty-four (24) hours of discovery or knowledge of the event.

NOTIFIABLE EVENT FORM

Date:		Licensee name & license #:	Licensee location:
Name of employee writing report:		Badge #:	Email and phone number:
Date of event:	Time of event:	Location of event:	Type of notifiable event:
Name of employee(s) involved:		Badge #:	Contact information:
Name of Reg. Patient(s), Cannabis(s), Visiting Qualified Patient(s) involved:		Patient(s)/Cannabis(s) card #:	Contact information:
Name & contact info of other witnesses involved (if applicable):			
Description of the event:			
Signatures: <small>(A report is required to be filled out by each employee involved in the event)</small>			



If you experience a notifiable event, the notification to the Office of Medical Cannabis must be provided on a form prescribed by the cabinet and available on Office of Medical Cannabis website at kymedcan.ky.gov or through the business licensing portal. Required information includes time and date of the event, the individuals involved, and a detailed description of the event.

This form must be sent via electronic mail to kymedcanreporting@ky.gov or through the business licensing portal within twenty-four (24) hours of discovery or knowledge of the event.

ID Verification

Patients with a cabinet issued registry identification card

Per 915 KAR 1:070 Section 2(2) Prior to dispensing medical cannabis to registered qualified patients, designated caregivers, and visiting qualified patients who have a registry identification card issued by the cabinet, the dispensary shall:

- Verify the validity of the registry identification card through use of the commonwealth's designated electronic monitoring system;
- Verify that the individual presenting the registry identification card is at least eighteen (18) years of age and is the person identified on the registry identification card by examining **at least one** (1) other form of **government-issued photo identification**; and
- Verify the amount of medical cannabis that the registered cardholder is legally permitted to purchase by checking the commonwealth's designated electronic monitoring system. If a medical cannabis practitioner sets forth recommendations, requirements, or limitations as to the form or dosage of medical cannabis on the written certification issued to the individual, the medical cannabis dispensed shall conform to those recommendations, requirements, or limitations.

There are different processes for verifying the ID for cardholders that are registered with the Office of Medical Cannabis and for visiting qualified cardholders.

Let's start with those patients that have a cabinet issued registry identification card.

Per 915 KAR 1:070 Section 2(2), prior to dispensing medical cannabis to registered qualified patients, designated caregivers, and visiting qualified patients who have a registry identification card issued by the cabinet, the dispensary shall:

- Verify the validity of the registry identification card through use of the commonwealth's designated electronic monitoring system;
- Verify that the individual presenting the registry identification card is at least eighteen years of age and is the person identified on the registry identification card by examining **at least one** other form of **government-issued photo identification**; and
- Verify the amount of medical cannabis that the registered qualified cardholder is legally permitted to purchase by checking the commonwealth's designated electronic monitoring system. If a medical cannabis practitioner sets forth recommendations, requirements, or limitations as to the form or dosage of medical cannabis on the written certification issued to the individual, the medical cannabis dispensed shall conform to those recommendations, requirements, or limitations.

ID Verification

Patients without a cabinet issued registry identification card

Per 915 KAR 1:070 Section 2(3) Prior to dispensing medical cannabis to visiting qualified patients that ***do not*** have a registry identification card issued by the cabinet, the dispensary shall:

- Review the out-of-state registry identification card presented by the individual to determine any issues with its validity, including checking any expiration date;
- Verify that the individual presenting the registry identification card is at least eighteen (18) years of age and is the person identified on the registry identification by examining ***at least one*** (1) other form of ***government-issued photo identification***;
- Examine documentation provided by the individual of having been diagnosed with a qualifying medical condition. This document shall consist of contemporaneous records containing an express statement of diagnosis of a qualifying medical condition and may include a written certification from a physician, patient history and physical report, or a physician summary report; and
- Inform the individual that they are not permitted to purchase more medical cannabis than a ten (10) day supply during a given eight (8) day period.

Let's look at the process for confirming the ID for patients that do not have a cabinet issued registry identification card. Please note that this section deals with visiting qualified patients who possess a valid out-of-state medical cannabis card but do not possess a Kentucky medical cannabis card.

Per **915 KAR 1:070 Section 2(3)**, prior to dispensing medical cannabis to visiting qualified patients that ***do not*** have a registry identification card issued by the cabinet, the dispensary shall:

- Review the out-of-state registry identification card presented by the individual to determine any issues with its validity, including checking any expiration date;
- Verify that the individual presenting the registry identification card is at least eighteen years of age and is the person identified on the registry identification card by examining ***at least one*** other form of ***government-issued photo identification***;
- Examine documentation provided by the individual of having been diagnosed with a qualifying medical condition. This document must consist of contemporaneous records containing an express statement of diagnosis of a qualifying medical condition and may include a written certification from a physician, patient history and physical report, or a physician summary report; and
- Inform the individual that they are not permitted to purchase more medical cannabis than a ten-day supply during a given eight (8) day period.

Worker Safety

Some **hazards** one may be exposed to in a dispensary facility include:

- Exposure to sensitizers and allergens
- Ergonomics
- Workplace violence

Please make sure to read the **Kentucky Medical Cannabis Industry Guide to Worker Safety and Health** provided by the Office of Medical Cannabis in collaboration with the Department of Workplace Standards.

- ↳ Licensees shall maintain a physical copy of this Guide in their facility in a manner that is readily accessible to its employees or agents and ensure that employees receive annual training on the contents of the guide.



All employees involved in the Kentucky Medical Cannabis Program should be aware of potential hazards in your facility. Some hazards one may be exposed to in a cultivation facility include:

- Exposure to sensitizers and allergens;
- Ergonomics; and
- Workplace violence

Please make sure to read the Kentucky Medical Cannabis Industry Guide to Worker Safety and Health provided by the Office of Medical Cannabis in collaboration with the Department of Workplace Standards.

Licensees shall maintain a physical copy of this Guide in their facility in a manner that is readily accessible to its employees or agents and ensure that employees receive annual training on the contents of the guide.

This guide is available under “Resources” on the “Businesses” tab of the Office of Medical Cannabis website at <https://kymedcan.ky.gov/businesses>.

Minimum Performance Standards

915 KAR 1:010, Section 6: Minimum performance standards for license renewal.

- (1) Pursuant to KRS 218B.080(5)(b), the renewal of a cannabis business license shall be contingent upon successful achievement of minimal performance standards established by the cabinet. The **minimum performance standards for licensees** participating in the Kentucky Medical Cannabis Program are:
- a) **The licensee has, and is likely to continue to maintain, effective controls against diversion of medicinal cannabis at its facility;**
 - b) The licensee has not made false or misleading statements in:
 1. A renewal application or any other application submitted to the cabinet;
 2. Any document or written communication submitted to the cabinet; or
 3. Any verbal communication to the cabinet.
 - c) **The licensee has a documented history of compliance with the licensee requirements in KRS Chapter 218B and 915 KAR Chapter 1;**
 - d) **The licensee has effectively addressed any identified compliance issues through corrective action;**
 - e) The licensee has shown it has the ability to continue to comply with all state and local laws and administrative regulations applicable to the activities in which it may engage under the license, if renewed;
 - f) **The licensee has a documented history of successfully addressing and mitigating any quality or safety issues with its medicinal cannabis or medicinal cannabis products;**
 - g) The licensee timely completes all reporting required by KRS Chapter 218B and 915 KAR Chapter 1; and
 - h) The licensee participates in surveys distributed by the cabinet and provides full, complete, and timely responses.
- (2) The cabinet shall **deny a renewal application** for a cannabis business license if it determines the licensee has failed to:
- (a) Meet one (1) or more of the minimum performance standards established in this section; or
 - (b) Any additional basis provided in KRS 218B.090

Lastly, all licensees must meet the minimum performance standards for license renewal.

915 KAR 1:010, Section 6 explains the minimum performance standards that a licensee must adhere to for annual license renewal.

The standards specifically related to enforcement and compliance include the following subsections of **915 KAR 1:010 Section 6(1)** which require that:

- (a) The licensee has, and is likely to continue to maintain, effective controls against diversion of medical cannabis at its facility;
- (c) The licensee has a documented history of compliance with the licensee requirements in **KRS Chapter 218B and 915 KAR Chapter 1**;
- (d) The licensee has effectively addressed any identified compliance issue through corrective action; and
- (f) The licensee has a documented history of successfully addressing and mitigating any quality or safety issues with its medical cannabis or medical cannabis products.

At the end of the licensure period, the Division of Enforcement and Compliance will create a report for each licensee regarding their compliance with required standards during the previous licensure period. Strict adherence to the requirements are important for the safety of cardholders, the citizens of the Commonwealth, and your business.

Questions?



OFFICE OF
MEDICAL CANNABIS

Contact the Office of Medical Cannabis Division of Enforcement and Compliance
kymedcanreporting@ky.gov



This concludes the employee required annual training for dispensary licensees. Thank you for your careful review and commitment to the Kentucky Medical Cannabis Program.

For any questions about the training, or general questions about operating a medical cannabis business in Kentucky, please contact the Division of Enforcement and Compliance for the Office of Medical Cannabis.



**CABINET FOR HEALTH AND FAMILY SERVICES
KENTUCKY OFFICE OF MEDICAL CANNABIS**

COMPLETION OF REQUIRED TRAINING ACKNOWLEDGMENT FORM

Per 915 KAR 1:020, Section 5(4), every principal, agent, employee, and volunteer of a licensee who has direct contact with cardholders, or physically handles cannabis seeds, seedlings, tissue cultures, clones, mature cannabis plants, medicinal cannabis, or medicinal cannabis products, shall complete applicable training required by the Office of Medical Cannabis, which may include trainings for cultivating, processing, testing, and retail sale of medicinal cannabis and usage of the Commonwealth's designated electronic monitoring system and seed to sale tracking system required by KRS 218B.140. Further, a cannabis business licensee shall retain any training participation records of its principals, agents, employees, and volunteers and make them available for inspection by the Office of Medical Cannabis upon request for a period of five (5) years.

By signing below, I confirm that I have completed the required training provided by the Office of Medical Cannabis for the applicable cannabis business license type. I further understand and acknowledge that a false statement made to the Office of Medical Cannabis is punishable under the applicable provisions of KRS 523.100.

Printed Name of Principal, Agent, Employee, or Volunteer

Signature of Principal, Agent, Employee, or Volunteer

Signature of Supervisor or Licensee Authorized Representative