



OFFICE OF
MEDICAL CANNABIS

Business Licensees
Employee Required Annual Trainings



This is the employee required annual training for licensed medical cannabis safety compliance facilities 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.



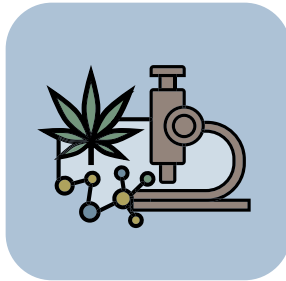
Sincerely,

A handwritten signature in blue ink that reads "Chafic George". The signature is fluid and cursive.

Chafic George
Enforcement and Compliance Director
Kentucky Office of Medical Cannabis



Employee Required Annual Trainings



Safety Compliance 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 safety compliance facilities 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?



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

Here is what this training will cover:

- Track and trace requirements;
- Overview of METRC;
- Testing requirements & Allowable Limits;
- Product limitations;
- Transporting medical cannabis & transportation manifest;
- Medical cannabis waste;
- Visitor requirements;
- Notifiable events;
- Worker safety; and
- Minimum Performance Standards.

Understanding Track and Trace Requirements

A safety compliance facility shall record in the commonwealth's designated electronic monitoring system and seed to sale tracking system all medicinal cannabis received, disposed, or otherwise transferred by the safety compliance facility and ensure the inventory *is accurate in real-time*.

See **915 KAR 1:060 Section 12(1)**.



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

Administrative Regulation **915 KAR 1:060 Section 12(1)** requires that a safety compliance facility shall record in the commonwealth's designated electronic monitoring system and seed to sale tracking system all medical cannabis received, disposed, or otherwise transferred by the safety compliance facility and ensure its inventory is accurate in real-time.

To stress that again, inventory shall 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 user the current amount, location, and which stage of the product life cycle the medical cannabis is currently in.
- A licensee is required to ensure that METRC accurately reflects their inventory at all times.
- **REMINDER:** All medical cannabis seeds, seedlings, clones, plants, material, 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 2 samples of blue dream each weighing 4 grams in their testing room, but METRC shows these samples weighing 5 grams each located in the vault.**

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

- The product weight 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 weight 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.

Here is an example of an inventory compliance failure:

- A Licensee has 2 samples of blue dream each weighing 4 grams each in their testing room, but METRC shows these samples weighing 5 grams each and still located in the Vault.
 - The licensee is out of compliance because the product weight is not accurately reflected in METRC and the physical location of the product does not align with its digital location specified in 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 additional enforcement actions.



About METRC: *What goes into the system?*

If it's medical cannabis, it must be tracked in METRC.

This includes *all* medical cannabis, such as:

Material



Seeds



Seedlings



MC Products



Plants



MC Waste



Again, all medical cannabis, such as medical cannabis material, seeds, seedlings, medical cannabis products, plants, or medical cannabis waste, **MUST** be tracked in METRC. This is crucial for tracking the entire lifecycle of the plants to products.



About METRC: *Tracking Inventory*

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

Plants

Packages

As a safety compliance facility, you will be utilizing 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.

Testing Requirements

915 KAR 1:110, Section 2: Medical cannabis tests

- (1) In accordance with Section 3 of this administrative regulation, finished medical cannabis products intended for sale by dispensaries to cardholders shall be tested for:
 - (a) Tetrahydrocannabinol (THC) and cannabinoid concentration;
 - (b) Terpenoid type and concentration;
 - (c) Residual solvents and processing chemicals (for production batches);
 - (d) Residual pesticides;
 - (e) Heavy metals;
 - (f) Microbial impurities;
 - (g) Mycotoxins;
 - (h) Water activity (for harvest batches);
 - (i) Yeast and mold; and
 - (j) Vitamin E acetate



Throughout the product life cycle, medical cannabis will undergo a variety of tests to ensure that our patients are receiving safe medication.

These tests include:

- THC and cannabinoid concentration
- Terpenoid type and concentration
- Residual solvents and processing chemicals (for production batches)
- Residual pesticides
- Heavy metals
- Microbial impurities
- Mycotoxins
- Water activity (for harvest batches)
- Yeast and mold; and
- Vitamin E acetate

Testing Requirements:

How are testing samples gathered in Kentucky?

915 KAR 1:110, Section 1(4): An authorized cannabis business employee or agent collecting any samples for testing shall follow the standard operating procedures established by the contracted safety compliance facility conducting the testing for:

- (a) Sampling; and
- (b) Documenting the chain of custody.



Pursuant **915 KAR 1:110, Section 1 (4)**, an authorized cannabis business employee or agent collecting any samples for testing shall follow the standard operating procedures established by the contracted safety compliance facility conducting the testing for:

- Sampling; and
- Documenting the chain of custody.

Safety Compliance Facility licensees are **required to provide medical cannabis businesses with Standard Operating Procedures** for how the licensee shall pull and document the chain of custody of medical cannabis samples.

Testing Requirements: *THC and Cannabinoid Testing*

- **915 KAR 1:110 Section 3(1)(a):**

- ↳ For THC and cannabinoid concentration, the testing shall include:

1. Total THC;
2. Total cannabidiol (CBD);
3. Total cannabinoids;
4. Tetrahydrocannabinolic acid (THCa);
5. Delta-9-tetrahydrocannabinol (Delta-9-THC);
6. Delta-8-tetrahydrocannabinol (Delta-8-THC);
7. Cannabidiolic acid (CBDa);
8. Cannabidiol (CBD);
9. Cannabinol (CBN);
10. Cannabigerolic acid (CBGa);
11. Cannabigerol (CBG);
12. Tetrahydrocannabivarin (THCv);
13. Cannbichromene (CBC)

Per 915 KAR 1:110 Section 3(1)(a), when testing for THC and Cannabinoids concentration, the testing shall include:

1. Total THC;
2. Total cannabidiol (CBD);
3. Total cannabinoids;
4. Tetrahydrocannabinolic acid (THCa);
5. Delta-9-tetrahydrocannabinol (Delta-9-THC);
6. Delta-8-tetrahydrocannabinol (Delta-8-THC);
7. Cannabidiolic acid (CBDa);
8. Cannabidiol (CBD);
9. Cannabinol (CBN);
10. Cannabigerolic acid (CBGa);
11. Cannabigerol (CBG);
12. Tetrahydrocannabivarin (THCv);
13. Cannbichromene (CBC)

Testing Requirements:

Where can you find the allowable limits?

Testing Requirement	Source
• Residual solvents and processing chemicals	Appendix A
• Residual pesticides	Appendix B
<ul style="list-style-type: none"> • Heavy metals • Microbial impurities • Mycotoxins 	<ul style="list-style-type: none"> • Water activity • Yeast and mold • Vitamin E acetate
<u>915 KAR 1:110 Section 3</u> Maximum Allowable Limits for Medicinal Cannabis Tests	

The allowable limits for residual solvents and processing chemical are located in **Appendix A of 915 KAR 1:110**.

The allowable limits for residual pesticides are located in **Appendix B of 915 KAR 1:110**.

And the allowable limits for the following items are located in **915 KAR 1:110, Section 3**:

- Heavy metals;
- Microbial impurities;
- Mycotoxins;
- Water activity;
- Yeast and mold; and
- Vitamin E acetate

Testing Requirements: *THC and Cannabinoid Testing*

- **Raw Plant Material**

- ↳ If a harvest batch sample exceeds the THC concentration limit imposed on raw plant material (35% THC concentration), the harvest batch shall be deemed medicinal cannabis waste and destroyed by the cultivator or producer in accordance with **915 KAR 1:030**.

- ⊘ **35.001% THC concentration is OVER THE LIMIT**

- **Finished concentrates not intended for oral consumption**

- ↳ Shall not exceed 70% THC concentration

- ⊘ **70.001% THC concentration is OVER THE LIMIT**

- **Finished concentrates intended for oral consumption**

- ↳ Serving size shall not exceed 10mg THC

- ⊘ **10.001 mg of THC per serving is OVER THE LIMIT**

When testing finished products, any product that exceeds the following potency limits will be deemed to have failed testing.

For raw plant material, if a harvest batch sample exceeds the thirty five percent (35%) THC concentration limit, the harvest batch shall be deemed medical cannabis waste and destroyed by the cultivator or producer in accordance with **915 KAR 1:030**.

↳ **To be clear, if raw plant material has a THC potency of 35.001%, it is over the limit.**

For finished concentrates, the product shall not exceed seventy percent (70%) THC concentration. The licensee will have the opportunity to remediate this product.

↳ **To be clear, if finished concentrates test at 70.001% or higher, then it has failed and the licensee can remediate the product.**

For finished products intended for oral consumption, commonly referred to as edibles, the product shall not exceed ten (10) milligrams THC per serving.

↳ **To be clear, if finished products intended for oral consumption test at 10.00 1miligrams of THC per serving, then it has failed, and the licensee can remediate the product.**

Testing Requirements:

Failed testing

915 KAR 1:110 Section 4(1): A harvest batch or production batch sample that fails any initial testing may be reanalyzed by the safety compliance facility using the reserve sample for that harvest or production batch.

↳ **915 KAR 1:110 Section 5** outlines which failed tests are allowed to be remediated.

- ⊘ Harvest or production batches that **fail a test which is not allowed to be remediated** according to Section 5, shall be deemed medicinal cannabis waste and destroyed.

Pursuant to **915 KAR 1:110 Section 4(1)**, a harvest batch or production batch sample that fails any initial testing may be reanalyzed by the safety compliance facility using the reserve sample for that harvest or production batch.

Section 5 of 915 KAR 1:110 outlines which failed tests are allowed to be remediated.

Harvest or production batches that fail a test which is not allowed to be remediated according to Section 5, shall be deemed medical cannabis waste and destroyed.

Testing Requirements: *When is Remediation Allowed?*

A production batch **may be remediated and re-tested** if it fails for:

- THC concentration for non raw plant material
- Residual solvents and processing chemicals
- Microbial impurities

Where remediation is allowed, a harvest or production batch shall only be **remediated twice**.

- ⊘ If the harvest or production batch fails testing after a second remediation attempt and the second re-testing, the harvest or production batch **shall be deemed medical cannabis waste and destroyed** by the cultivator, processor, or producer in accordance with **915 KAR 1:030 or 915 KAR 1:040** as applicable for their respective business.

There are certain tests, that if failed, the product may be remediated and tested again.

A production batch may be remediated and re-tested if it fails for:

- THC concentration for non-raw plant material
- Residual solvents and processing chemicals
- Microbial impurities.

Where remediation is allowed, a harvest or production batch shall **only be remediated twice**.

If the harvest or production batch fails testing after a second remediation attempt and the second re-testing, the harvest or production batch shall be deemed medical cannabis waste and destroyed by the cultivator, processor, or producer in accordance with **915 KAR 1:030** or **915 KAR 1:040** as applicable for their respective business.

Testing Requirements:

Product failures unable to be remediated

Pursuant to 915 KAR 1:110 Section 5, medical cannabis ***shall be deemed medical cannabis waste and shall be destroyed*** in accordance with **915 KAR 1:030** if it has failed the initial and reserve sampling testing for:

- Residual pesticides
- Heavy metals
- Mycotoxins
- Yeast and mold

There are also certain tests, that if failed, the product shall not be able to be remediated.

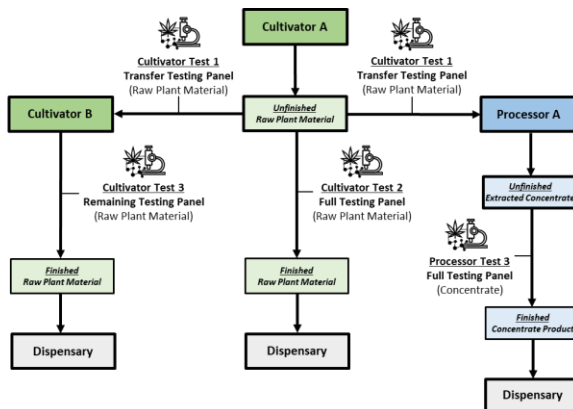
Pursuant to **915 KAR 1:110 Section 5**, medical cannabis shall be deemed medical cannabis waste and shall be destroyed in accordance with **915 KAR 1:030** if it has failed the initial reserve sampling testing for:

- Residual pesticides
- Heavy metals
- Mycotoxins; or
- Yeast and mold.

Testing Requirements:

Testing flow chart

Test	Requirements
Cultivator	1 Transfer Testing Panel <i>(Raw Plant Material)</i> <input type="checkbox"/> THC + Cannabinoid Concentration <input type="checkbox"/> Residual Pesticides
	2 Full Testing Panel <i>(Raw Plant Material)</i> <input type="checkbox"/> THC + Cannabinoid Concentration <input type="checkbox"/> Terpenoid Type + Concentration <input type="checkbox"/> Residual Pesticides <input type="checkbox"/> Heavy Metals <input type="checkbox"/> Microbial Impurities <input type="checkbox"/> Mycotoxins <input type="checkbox"/> Water Activity <input type="checkbox"/> Yeast + Mold
	3 Remaining Testing Panel <i>(Raw Plant Material)</i> <input type="checkbox"/> Terpenoid Type + Concentration <input type="checkbox"/> Heavy Metals <input type="checkbox"/> Microbial Impurities <input type="checkbox"/> Mycotoxins <input type="checkbox"/> Water Activity <input type="checkbox"/> Yeast + Mold

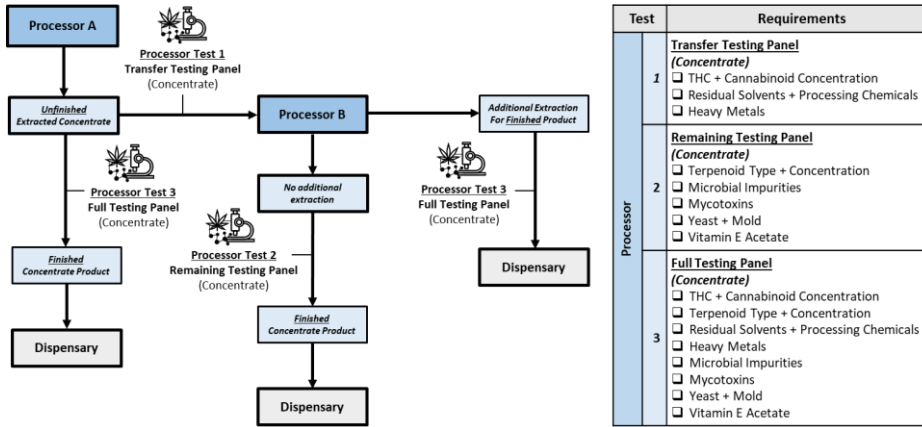


The Office of Medical Cannabis has created flow charts to help licensees understand what tests need to be conducted and when. These are available on the Office website under “Resources” on the “Businesses” page.

If you have questions, please reach out to your assigned investigator.

Testing Requirements:

Testing flow chart



The Office of Medical Cannabis has created flow charts to help licensees understand what tests need to be conducted and when. These are available on the Office website under “Resources” on the “Businesses” page.

If you have questions, please reach out to your assigned investigator.

Transporting Medical Cannabis

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 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

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

What is a METRC transportation manifest?

- A METRC transportation manifest is required any time medical cannabis is transported by a licensee.
- Think of the manifest as a plane ticket and the medical cannabis as the passenger. **A passenger cannot fly without a ticket and medical cannabis cannot be transported without a manifest.**
- The manifest provides all the information regarding a transport of medical cannabis.

METRC® MARIJUANA TRANSPORTATION MANIFEST	
All sales transactions are to be completed prior to transportation of any MARIJUANA. The receiving entity may inspect packaged deliveries, but original deliveries must be linked to approved orders in accordance with regulations.	
Manifest No.	000010201
Date Created	11/22/2021 9:41 PM
Originating Entity	MA Marijuana Cultivator A
Originating License Number	A03-X0001
Address of Originating Entity	200 East St Boston, MA 02129
1. Destination	MA Marijuana Retailer
Destination License Number	A03-X0001
Address of Destination	200 East St Boston, MA 02129
Destination Phone No.	555-555-5557
Date and Approx. Time of Departure	11/22/2021 9:41 PM
Date and Approx. Time of Arrival	11/22/2021 9:41 PM
Route to be Traveled	Sample Route
1. Outbound Transporter	MA Adult-Use Transporter
Transporter License Number	A03-X0001
Address of Transporter	20 Boston St Boston, MA 02127
Package	Shipped
Production Batch No.	GA-15-21
Item Name	GA-15-21
Quantity	100

A METRC transportation manifest is required anytime medical cannabis is transported by a licensee.

Think of the manifest as a plane ticket and the medical cannabis as the passenger. A passenger cannot fly without a ticket and medical cannabis cannot be transported without a manifest.

Like a plane ticket, the manifest provides all the information about the medical cannabis being transported along with the individuals handling the transportation.

It will show:

- The originating entity;
- The destination of the product;
- Who is conducting the transporting; and
- Information regarding the product being transported.

Medical Cannabis Waste

- **915 KAR 1:060, Section 16** governs the management, recording, and disposal of **medical cannabis waste**.
- Medical cannabis can be wasted via controlled **incineration** or by **grinding**.
 - If you choose 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 1:060 Section 16 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 1:060, Section 16(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 medical 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 medical cannabis; and
 - (f) The harvest batch or production batch number and weight of the medical cannabis being disposed of.



915 KAR 1:060 Section 16(4) states 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;
- The 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 batch number, strain, volume and weight of the plant material being disposed of.

Medical Cannabis Waste

Key takeaways of medical cannabis waste

915 KAR 1:060, Section 16(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 1:060, Section 16(3)** requires that the entire waste procedure, from destruction to the dumpster, shall be performed under video surveillance.
- **915 KAR 1:060, Section 16(4)** requires two (2) employees to perform waste procedures.
- **915 KAR 1:060, Section 16(1)** requires waste to be recorded in METRC and on a separate waste log per **915 KAR 1:060, Section 16(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 safety compliance 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 (excluding emergency personnel and Office of Medical Cannabis staff).

📄 Visitors **must be accompanied at all times** in the facility by a badged employee.

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

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

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

➔ **915 KAR 1:060, Section 10(3)**: An individual between 18 and 21 is allowed onsite **IF** "that person is present to perform contract work, including electrical, plumbing, or security maintenance, that does not involve handling medicinal cannabis or is a government employee and is at the cannabis business in the course of his or her official duties."

Safety compliance facilities are NOT open to the public therefore visitor access must be limited.

Anytime an individual arrives at a medical cannabis safety compliance 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.

The visitor must be accompanied at all times in the facility by a badged employee.

The following information about the visitor must be captured on a dedicated visitor log:

- Date of visit;
- 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.

Additionally, no visitors under the age of 18 are allowed onsite.

- An individual between 18 and 21 years of age shall only be allowed onsite if:
 - That person is present to perform contract work, including electrical, plumbing, or security maintenance, that does not involve handling medical cannabis or is a government employee and is at the cannabis business in the course of his or her official duties.

Ensure all visitor requirements are followed prior to allowing a visitor access to the facility.

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:

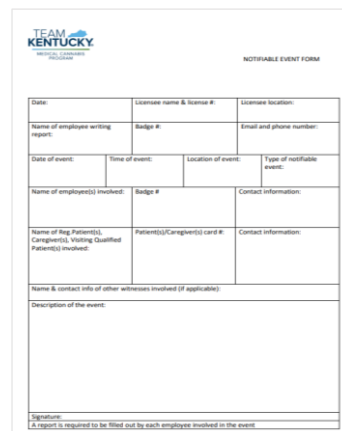
- (1) Inventory discrepancies;
- (2) Diversion, theft, or loss of any medical cannabis or medical cannabis product;
- (3) Unauthorized destruction of medical cannabis;
- (4) Any criminal proceeding involving the licensee's owners, principal officers, board members, employees, volunteers, financial backers, 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.



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.

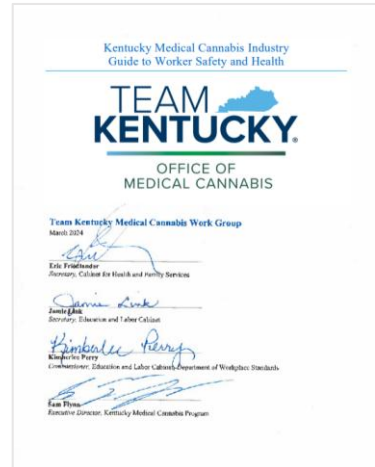
Worker Safety

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

- Exposure to solvents
- Ergonomics
- Industrial machinery

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 safety compliance facility include:

- Exposure to solvents
- Ergonomics; and
- Industrial machinery

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 safety compliance facility 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