



CANNABIS DISPENSARY AGENT TRAINING (CDAT) APPLICATION GUIDANCE

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The purpose of the Maryland Medical Cannabis Commission (MMCC or the Commission) is to develop policies, procedures, guidelines, and regulations to implement programs to make medical cannabis available to qualifying patients in a safe and effective manner. Ensuring high-quality and comprehensive training resources for dispensary agents is essential to this mission.

An organization designated by MMCC to provide Cannabis Dispensary Agent Training (CDAT) is an entity – separate and independent from the Commission – that MMCC has approved to provide training to registered agents of Maryland licensed cannabis dispensaries. If the Commission approves the entity's CDAT application, the entity will be designated and posted as a training resource for dispensaries on the Commission's website (mmcc.maryland.gov).

This document is not legal advice. The following guidance is provided to assist businesses in understanding the CDAT application process and complying with state laws and regulations governing the CDAT requirements.

Applicant Requirements

The online application to be considered as a CDAT provider in Maryland is available [here](#). A checklist of required exhibits can be found below in Application Requirements, Table 1. All exhibits (B-G) of the checklist must be adequately satisfied for an application to be deemed complete for MMCC review. A non-refundable \$200 fee for a three-year designation must be paid in the form of a cashier's check or money order made payable to the "Maryland Medical Cannabis Commission" and mailed to: Maryland Medical Cannabis Commission, Attn: Finance and Registrations, 849 International Drive, 4th Floor, Linthicum, MD 21090. Applicants must submit a photocopy or scan of the cashier's check or money order.

An owner or employee of an entity providing a CDAT is not permitted to have employment by or interest in a Maryland medical cannabis licensee or registrant. These standards are established by the Commission to ensure trainers do not experience conflicts of interest or sell certain services, equipment, or supplies from third parties. The standards in this section apply to a CDAT provider's relationship with any entity, or individual affiliated with such entity, that cultivates, manufactures, produces, tests, transports, delivers, provides greenwaste services, or sells cannabis, cannabis products, or cannabis accessories. Each owner and key personnel of an entity applying to provide a CDAT program must complete a Conflict-of-Interest Attestation (see page 5).

MMCC-designated CDAT providers are required to stay up to date on developments in federal and state laws and regulations to ensure its training and testing materials are current. CDAT providers are required to meet record retention requirements as set out below (see Recordkeeping). To maintain "designated"



status, CDAT providers must submit a renewal application form to the Commission, including a list of all changes made to the training since its initial Commission approval, **every three (3) years**, and/or upon request.

Required Components and Conditions

Approved CDAT programs may be delivered in an online or virtual classroom setting provided that the CDAT provider can verify the identity of the participant and ensure interactivity throughout the training.

CDAT programs must cover the following core elements identified in COMAR 10.62.26.07, in addition to other core elements identified by the Commission. Please note, CDAT providers may elect to add supplementary material provided COMAR 10.62.26.07 requirements are met.

COMAR 10.62.26.07—Registered Dispensary Agent Training Core Elements:

1. Federal and State medical cannabis laws and regulations and other laws and regulations pertinent to the dispensary agent's responsibilities;
2. Standard operating procedures;
3. Detection and prevention of diversion of medical cannabis;
4. Security procedures;
5. Safety procedures, including responding to a: 1) medical emergency; 2) fire; 3) chemical spill; 4) threatening event such as a(n): a) armed robbery; b) invasion; c) burglary; d) other criminal incident;
6. The pharmacology of cannabis and its active components;
7. The potential therapeutic and adverse effects of medical cannabis;
8. Dosage forms of medical cannabis and their pharmacodynamic impact;
9. Potential drug interactions and consumer safety issues with medical cannabis use;
10. Recognition of symptoms of substance use disorders and acute intoxication.

Participant Testing and Program Evaluation

The CDAT program must prepare participants to pass a post-training test with a score of 70% or better. Online programs must employ measures to ensure participants cannot skip through any portions of the training. Designated providers shall allow Commission staff to observe their courses, either online or in-person, without notice. Once participants have completed their course, each participant must complete an evaluation assessing program effectiveness; the Commission may provide specific evaluation questions and/or require submission of evaluation responses. CDAT providers must review evaluations and make course corrections, pursuant to the Commission's specifications, as appropriate.

Recordkeeping

MMCC-designated CDAT providers must maintain training records for **four (4) years**. Providers must make records available for inspection by Commission staff and any other applicable licensing authority upon request. The CDAT provider shall ensure that all other terms and deadlines are met.



Application Process

Table 1 outlines the required materials to be submitted to MMCC for review. If the Commission approves the entity’s application, the entity will be designated to provide CDAT with the entity’s website and phone number posted to the Commission’s website (mmcc.maryland.gov).

- **Exhibit A** is the application form that will be automatically and electronically received by the MMCC upon completion and submission of the online form.
- **Exhibits B-G** must be clearly labeled with Exhibit Letter and Name and uploaded electronically in the online application form.
- **Exhibit H*** is only applicable for renewal applications, which must be submitted every three (3) years.

Applicants should anticipate at least **90 days** for formal consideration of a CDAT application. After submission of training materials, no further changes to the material are permitted during the review process unless they are specifically requested by MMCC. An applicant must provide any additional information requested by MMCC during the review process within 30 days. Failure to do so may result in the denial of an application.

Table 1

Exhibit Letter	Exhibit Name	Required Documentation
A	“Application form”	1. A completed online CDAT Application form .
B	“Application Fee”	1. \$200 paid in the form of a cashier's check or money order 2. The non-refundable fee for a three-year designation must be paid in the form of a cashier's check or money order made payable to the "Maryland Medical Cannabis Commission" and mailed to: Maryland Medical Cannabis Commission, Attn: Finance and Registrations, 849 International Drive, 4th Floor, Linthicum, MD 21090 3. A photocopy or scan of the cashier’s check or money order
C	“Owners”	1. List of any individual(s) with an ownership stake in the applicant 2. Signed Conflict-of-Interest Attestation from each owner (See page 5)
D	“Key personnel”	Applicants must identify the number and types of proposed key personnel, such as managers, employees, and individuals who will facilitate the training. For each individual: 1. Describe in detail how their experience and qualifications relate to their specific responsibilities. <i>Note:</i> All individuals facilitating trainings must have a minimum of 12 months of experience providing training on cannabis or similar topics. If training experience is not cannabis-specific, please explain how this experience will be obtained prior to facilitating 2. CV/resume 3. Signed Conflict-of-Interest Attestation



E	“Course Outline”	<ol style="list-style-type: none"> 1. Syllabus 2. List of objectives 3. Bullet point outline of the curriculum plan that shows all topics to be covered and length of time for each subject 4. Clear identification of how sections of the curriculum correspond to each required training core element 5. Course provides a minimum of 4 hours of training. Clear identification of supplementary topics (i.e., those not required in COMAR 10.62.26.07). 6. <i>IF virtual</i>, method to verify the identification of each participant in the course and certify completion, track participant time to complete the course, and allow for the participant to ask questions regarding the CDAT (i.e., by email, virtual discussion) 7. A copy of the CDAT Participant Evaluation Form
F	“Electronic Training Materials for each COMAR 10.62.26.07 core element”	<p>All facilitator and participant training materials:</p> <ol style="list-style-type: none"> 1. Federal and State medical cannabis laws and regulations pertinent to the dispensary agent’s responsibilities 2. Standard operating procedures 3. Detection / prevention of diversion 4. Security procedures 5. Safety procedures, including responding to a medical emergency, fire, chemical spill, and threatening event, such as an armed robbery, invasion, burglary, and any other criminal incident 6. Cannabis pharmacology / active components 7. Cannabis potential therapeutic / adverse effects 8. Dosage forms of medical cannabis and their pharmacodynamic impact 9. Cannabis potential drug interactions and consumer safety issues 10. Recognition of symptoms of substance use disorders and acute intoxication
G	“Testing Methods and Materials”	<ol style="list-style-type: none"> 1. Testing materials 2. Description of testing methods
H*	“Renewal Application Materials”	<ol style="list-style-type: none"> 1. List of all Maryland businesses and individuals who have successfully completed training in the last three (3) years 2. Submit a list of completed participant course evaluations (copies of the evaluation responses may be requested) 3. Submit an outline/summary of any changes and updates to course curriculum and materials. Include any items that have been updated

Questions may be directed to publichealth.mmcc@maryland.gov.



Cannabis Dispensary Agent Training (CDAT) Conflict-of-Interest Attestation

A CDAT provider is an entity separate and independent from the Commission who is approved to provide training to registered agents of Maryland licensed cannabis dispensaries. To preserve independence, no owner, manager, or employee of a CDAT provider may have employment by or interest in a Maryland Medical Cannabis licensee or registrant. Any individual with an **ownership (Exhibit C)** stake in the applicant must complete this form. Any individual identified as **key personnel (Exhibit D)**, such as managers, key employees, and individuals who will facilitate the proposed training must complete this form.

Contact Information:

Name: _____

Title and Organization: _____

Email Address: _____

Check the box that accurately describes the applicant: **Owner** **Key personnel**

Attestation *(check the box next to the statement to attest to the truth of that statement):*

I do not currently have employment by or interest in a Maryland Medical Cannabis licensee or registrant.

Acknowledgement:

I understand that I must submit this form and respond to any related follow-up inquiry by the Commission for review of the pending CDAT application.

By signing below, I attest to the truthfulness of all information provided in this form.

Signature: _____ Date: _____