Toolkit · Operate Plan Updated November 22, 2026

Employee Training Plan and Record

The employee and training requirements in the Cannabis Control Act and the CCA draft rules, each cited: the eight initial training topics, annual in-service training, the six-part training record, retail risk training, the under-21 employment bar, felony and marijuana-offense hiring rules, the responsible party, name tags and workplace policy.

Who needs it: Every marijuana establishment and its responsible party; Retail stores and microbusinesses (Board-approved risk training); Dual-use medical operators (pharmacist and pharmacy technician rules).

Rule basis: Code of Virginia §§ 4.1-604, 4.1-701, 4.1-802 D and E, 4.1-810 B 1 c, 4.1-903 D 3, 4.1-1200 A 7, 4.1-1201; draft rules 3VAC10-30-120 A, -130 G, 3VAC10-40-20, -25, -100, -110, -120, -150 E, 3VAC10-50-60 A 10 and 11, 3VAC10-50-85 E and F, 3VAC10-50-90, -95, 3VAC10-60-40 F (proposed); CCA draft provisions for CPHAC review (Nov. 2026).

Citations starting **3VAC10** are the Cannabis Control Authority's draft proposed adult-use regulations dated September 9, 2026: **proposed, not final, may change**. Citations starting **§ 4.1** are the Code of Virginia as amended by HB 30, Chapter 1 (2026). The section "What other states required or scored" is reference only and is not Virginia law.

We report what the law says. Not legal advice; see the disclaimer.

The Cannabis Control Act bars employees and volunteers under 21, makes licensees answerable for their employees' violations, and requires retail stores to train staff on the risks of marijuana use. The CCA's draft rules require training on eight topics before an employee starts work, annual in-service training, and a signed training record. Citations to 3VAC10 are to the CCA's draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption). A November 2026 CCA document listing

revised provisions for Cannabis Public Health Advisory Council (CPHAC) review is cited separately where its wording differs.

What Virginia requires

Who may work (statute)

- The Board must refuse a license if the applicant, or a 10% owner, general partner, officer or director as listed in the statute, "knowingly employs or allows to volunteer someone younger than 21 years of age" (Code of Virginia § 4.1-810 B 1 c).
- No licensee, agent or employee may "allow a person younger than 21 years of age to be employed by or volunteer for such licensee"; a violation is a Class 1 misdemeanor (§ 4.1-1200 A 7 and B).
- The licensee "may be held liable for any violation of this subtitle or any Board regulation committed by such agents or employees in connection with their employment" (§ 4.1-701).

On-the-job conduct (statute)

- No licensee, agent or employee may use or consume marijuana (i) on the licensed premises, except quality-control sampling allowed by Board regulation, or (ii) while on duty in a position involved in selling marijuana to consumers (§ 4.1-1201 A).
- No licensee, agent or employee may make any gift of marijuana (§ 4.1-1201 B).
- A violation of § 4.1-1201 carries a civil penalty of up to $500; on a second or subsequent violation by an employee, the Board requires the licensee to terminate that employee, and the person is barred from obtaining a license or employment at a marijuana establishment (§ 4.1-1201 C).

Retail training (statute)

- Each retail store provides training "established or approved by the Board, to all employees educating them on how to discuss the potential risks of marijuana use with consumers" (§ 4.1-802 E).
- The Board establishes standards and an online course for retail store and microbusiness employees on educating consumers about the potential risks of marijuana use (§ 4.1-604 6).
- Each retail store prominently displays and makes available Board-approved information on the potential risks of marijuana use (§ 4.1-802 D).
- The Board's penalty rules must provide reduced suspensions and civil penalties for a retail store or microbusiness that shows it gave employees "marijuana seller training certified in advance by the Board" (§ 4.1-903 D 3).

Initial training (draft)

- All employees complete training before commencing work, covering at minimum (3VAC10-40-100 A, draft):
    1. Proper use of security measures and controls adopted to prevent diversion, theft or loss;
    2. Procedures and instructions for responding to an emergency;
    3. Professional conduct, ethics, and state and federal statutes and regulations on privacy and confidentiality;
    4. Rules and regulations on legal cultivation, processing, transportation, handling and sale of marijuana in Virginia;
    5. Health and safety education on marijuana use, including health risks, safe and responsible consumption, and responsible service;
    6. Safety and sanitation procedures;
    7. Proper use of the statewide seed-to-sale tracking system; and
    8. Procedures for verifying the identity and age of patients, parents, legal guardians, registered agents or consumers, as applicable to the license type.
- The November 2026 CPHAC review document words the timing as training completed "prior to the employee engaging in regulated operations" (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-40-100 A 6).

Continuing training and records (draft)

- The PIC or responsible party ensures continued competency through in-service training at least annually that supplements initial training and includes any guidance the Board specifies (3VAC10-40-100 B, draft).
- The PIC or responsible party keeps a written record of initial and continuing training for each employee with: (1) name of the trainee; (2) dates of training; (3) a general description of topics; (4) name of the person supervising the training; (5) signatures of the trainee and the PIC or responsible party; and (6) attestation that the trainee demonstrates an understanding of the material (3VAC10-40-100 C, draft).
- When the PIC or responsible party changes, the new one reviews and signs the training record (3VAC10-40-100 D, draft).
- The establishment maintains the training record and makes it available in accordance with regulations (3VAC10-40-100 E, draft).
- A copy of the training material covering all topics is accessible to employees at the licensed premises (3VAC10-40-100 F, draft).
- The responsible party ensures all employees working in secured areas are properly trained (3VAC10-40-120 E 1, draft).

Role-specific training (draft)

- Establishments using hydrocarbon-based solvents develop standard operating procedures, good manufacturing practices and a training plan before using them, and anyone using solvents in a closed-loop system is fully trained on the system, has direct access to safety data sheets, and handles and stores solvents safely (3VAC10-50-60 A 10 and 11, draft).
- A designated sample collector is trained on the established sampling policies and procedures (3VAC10-60-40 F 1, draft).
- The retail transaction error quality assurance policies are distributed to all employees, and the responsible party or designated supervisor informs employees of resulting changes and tells them that discovered errors are relayed immediately to the responsible party or designated supervisor (3VAC10-50-95 B and D 1 and 2, draft).

- Pharmaceutical processors and dispensing facilities distribute dispensing error policies to all employees and inform them of changes (3VAC10-50-90 B and D, draft).

Hiring rules tied to criminal history (draft)

- No person convicted of a felony under Virginia law or another jurisdiction's law within the last five years may be a material owner of, be employed by, or act as an agent of a marijuana establishment (3VAC10-30-120 A, draft).
- The CCA will act to suspend or revoke a license if a licensee knowingly employs a person convicted of a felony or a crime involving moral turpitude, and the same subsection addresses positions involved in creating or maintaining required records or preparing required tax returns held by persons convicted of listed felonies (robbery, burglary, larceny, embezzlement, computer crimes, forgery, false pretenses, bad checks, false representations to obtain property or credit, credit card forgery or fraud, money laundering, or similar offenses) (3VAC10-50-85 E, draft).
- To employ a person who violated marijuana laws, the licensee may hire immediately if the offense was more than five years before the employment date, or apply to the CCA for approval if within five years; the CCA may investigate suitability (3VAC10-50-85 F, draft).
- An employee convicted of a felony must be reported to the Board immediately (3VAC10-40-150 E, draft).

Supervision, identification and workplace policy (draft)

- All employees wear name tags or similar identification showing their position while inside the establishment (3VAC10-40-20 C, draft).
- A written alcohol-free, drug-free and smoke-free workplace policy is established, implemented and available to the Board on request (3VAC10-40-20 E, draft).
- A person may be the responsible party for only one establishment at a time, employed full time in a managerial position at that location and actively engaged in daily operations during normal hours (3VAC10-40-120 B, draft).

- The responsible party for a cultivation facility, processing facility or microbusiness has at least two years of verifiable experience cultivating plants or extracting chemicals from plants (3VAC10-40-120 A, draft).
- The responsible party is aware of and knowledgeable about all policies and procedures (3VAC10-40-120 C, draft).
- If the responsible party resigns or leaves, the Board is notified within 48 hours and a change application naming a new responsible party is filed within 14 days (3VAC10-40-120 H, draft).
- A designated supervisor is present and in actual charge whenever the responsible party is not present and the establishment is open; the name is posted conspicuously in letters not less than one inch while that person is in charge (3VAC10-30-130 G, draft).

Dual-use medical operations (draft)

- Only a pharmacist may dispense cannabis products to patients, their parents or legal guardians, or registered agents; a qualified pharmacy technician may assist under direct supervision (3VAC10-40-25 A, draft).
- Pharmacists and pharmacy technicians have their current license or registration available for inspection at all times while at the facility (3VAC10-40-25 C, draft).
- The ratio of pharmacy technicians to pharmacists on duty in production or dispensing areas may not exceed six to one (3VAC10-40-110 A, draft).
- Pharmacy technicians may not counsel patients, consult with the certifying practitioner, interpret clinical data or give medical advice, decide on substitutions, or seek clarification of a certification from the practitioner (3VAC10-40-110 C, draft).

Records and forms the rules name

Training record (contents exactly as listed in 3VAC10-40-100 C, draft)

Name of person trained	Dates of training	General description of topics covered	Name of person supervising the training	Signature of person trained	Signature of PIC or responsible party	Attestation that the trainee demonstrates understanding

Initial training topics checklist (3VAC10-40-100 A 1 to 8, draft)

Topic	Date completed
1. Security measures and controls against diversion, theft or loss	
2. Emergency response procedures	
3. Professional conduct, ethics, privacy and confidentiality law	
4. Virginia rules on cultivation, processing, transportation, handling and sale	
5. Health and safety education on marijuana use and responsible service	
6. Safety and sanitation procedures	
7. Statewide seed-to-sale tracking system	
8. Identity and age verification, as applicable to the license type	

Change of PIC or responsible party review (3VAC10-40-100 D, draft)

New PIC or responsible party	Date training record reviewed	Signature

What the law does not say

- The draft rules do not create a state registration, permit or badge for employees of adult-use marijuana establishments.
- The draft rules do not set a minimum number of training hours.
- The draft rules do not state a retention period for training records.

What other states required or scored

Not required in Virginia. Shown so applicants can see what other regulators asked for.

Illinois (410 ILCS 705/15-30; IDFPR dispensary application)

- Illinois scored "Suitability of Employee Training Plan" at 15 of 250 points (410 ILCS 705/15-30(c)(1)).
- The scored plan showed that employees would understand applicable rules and laws, know the security measures and operating procedures, and be able to "advise purchasers on how to safely consume cannabis" (410 ILCS 705/15-30(c)(1)).
- The application's Agent Training and Education exhibit was limited to 15 pages (IDFPR Application, Exhibit D).

Massachusetts (935 CMR 500.105(2))

- Massachusetts requires agents to complete minimum training before performing job functions and eight hours of role-tailored training annually (935 CMR 500.105(2)(a)1.).
- At least four of the eight hours come from Responsible Vendor Training Program courses; on-the-job training may count toward the rest (935 CMR 500.105(2)(a)2.-3.).
- Staff who enter product into the Seed-to-sale system receive training in a form set by the Commission (935 CMR 500.105(2)(a)4.).

- Training compliance records are kept four years (935 CMR 500.105(2)(a)5.).

New York (9 NYCRR 125.5)

- New York requires a Responsible Workforce Training within 30 days of starting licensed activities, free to the recipient, in English and each recipient's primary language (9 NYCRR 125.5(a)).
- The training includes an Office-set product safety course, a workforce responsibility course, at least one hour of implicit bias or cultural competency training, and at least two hours of safety-related training (9 NYCRR 125.5(c)).
- Training happens during work hours at the employee's usual rate of pay (9 NYCRR 125.5(d)).
- Employees receive the written operating procedures and employee handbook during training, and both stay available on premises (9 NYCRR 125.5(e)).

New Jersey (N.J.A.C. 17:30-9.8)

- New Jersey requires owners and principals who handle cannabis, employees, volunteers and management services contractor staff to complete at least eight hours of ongoing training each calendar year (N.J.A.C. 17:30-9.8(a)).
- Topics include state and federal cannabis law, privacy and confidentiality law, security measures, and emergency procedures "including a robbery or workplace violence" (N.J.A.C. 17:30-9.8(b)).
- Training is delivered through an on-site curriculum or contracted outside resources (N.J.A.C. 17:30-9.8(c)).

Ohio (OAC 1301:18-3-10)

- Ohio requires an employee training program reviewed annually, with evidence of ongoing compliance submitted to the Division (OAC 1301:18-3-10(A)).
- Foundational training before starting covers assigned procedures, the state inventory tracking system, inspection preparation, badge rules, Ohio cannabis law, and responsible use and addiction resources (OAC 1301:18-3-10(B)).
- Security personnel complete additional required training before accessing the security and surveillance area (OAC 1301:18-3-10(C)(1)).

Maryland (COMAR 14.17.15.05)

- Maryland requires training on cannabis law, SOPs, the drug-free workplace policy, diversion prevention, security, and responses to medical emergencies, fire, chemical spills, and robbery or burglary (COMAR 14.17.15.05A).
- Training materials and attendance records are retained for inspection (COMAR 14.17.15.05B).
- Agents complete a registered responsible vendor training program within 90 days of starting and annually after that (COMAR 14.17.15.05C).

Sources checked 2026-11-22.

- 410 ILCS 705/15-30 (FindLaw mirror of Illinois Compiled Statutes)
- IDFPR, Conditional Adult Use Dispensing Organization License Application (rev. 10/11/19)
- Cannabis Control Commission, 935 CMR 500.000 (effective 09-11-26)
- Office of Cannabis Management, Express Terms adopting Parts 118-125 and 131 (9 NYCRR)
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules
- OAC 1301:18-3-10, Employee Training and Qualification Requirements
- COMAR 14.17.15.05, Training

Sources

- Code of Virginia § 4.1-604 (Powers and duties of the Board)
- Code of Virginia § 4.1-701 (To whom privileges conferred by licenses extend; liability)
- Code of Virginia § 4.1-802 (Retail marijuana store license)
- Code of Virginia § 4.1-810 (Conditions under which the Board shall or may refuse to grant licenses)
- Code of Virginia § 4.1-903 (Suspension or revocation; civil penalties)
- Code of Virginia § 4.1-1200 (Illegal cultivation, etc., by licensees)
- Code of Virginia § 4.1-1201 (Prohibited acts by employees of licensees)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-30, 3VAC10-40, 3VAC10-50, 3VAC10-60

- CCA, Draft Regulation Provisions for CPHAC Review (Nov. 2026)

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