

Business Plan Creation and Development

Purpose: This course will provide a comprehensive overview of how to create and develop a working business plan and cost analysis. The course includes group application walk-through. The Course Instructor will be available for one-on-one application walk-through based on participant interest and need. If unable to meet the demand for one-on-one sessions, the Course Instructor will work with the Commission to seek an agreed-upon solution.

Learning Objectives: Participants will develop a fluid draft of their business vision, plan and cost analysis, and a checklist and framework of next steps. Participants will learn how to apply their business plan and use it to prepare for marketing and fundraising.

Regulations to Cover:

- 500.101(f)(2): Application Requirements

Components to consider:

- 500.101 - What is a Business Plan?
- What should be included in a business plan?
 - What components make a business plan successful in a licensing application and with investors?
- Applying your business plan
- Using your business plan for marketing and fundraising with investors
- Summarizing your business plan/developing an “elevator pitch”
- Business plan tools and resources



Raising Capital in the Cannabis Industry

Purpose: This course will teach participants about avenues of raising capital, investment types and how to identify, connect with, and pitch to investors. The course will also provide insight into the challenges of raising capital, predatory practices, and navigating the industry due to federal illegality.

Learning Objectives: Participants will develop a plan to raise capital and understand different fundraising options, investment types, and predatory practices. Participants will also create and practice their pitches. The Course Instructor will provide a panel discussion with investors that provides (i) insights as to investor concerns and (ii) an opportunity for networking with participants.

Regulations to Cover:

- 500.101 (1)(a)4e-h: Application Requirements / Application of Intent
- 500.101 (1)(a)5: Application Requirements / Application of Intent

Components to Consider:

- What is Capital?
- Types of Capital
- Do I need capital? How much capital do I need?
 - Disclosing Capital Amounts (Regulation Sections)
- Accessing capital needed based on budget and cost analysis
- Where to look for investors
- Types of investors
- How to screen/vet potential investors and investor red flags
- Do investors need ownership/equity/control?
- Challenges of raising capital (especially in context to ownership requirements to receive SEP benefits)
- Overcoming challenges
- Tools and resources to connect with investors



Predatory Lending in the Cannabis Industry

Purpose: This course aims to heighten participants’ awareness of the issues of predatory lending practices. The course will assist participants in preventing, resolving, and protecting industry entrepreneurs from falling victim to predatory lending practices.

Learning Objectives: Participants will learn to manage the risk and rewards of cannabis financial lending practices. Participants will be able to:

- Define “predatory lending”
- Understand Massachusetts General Laws and Regulations
- Recognize predatory red flags
- Understand the dynamics of funding marijuana businesses
- Understand predatory lending tactics and how to avoid them
- Know how to establish sound and reliable lending resources
- Learn techniques to successfully raise capital in the cannabis industry
- Use their business plans to help guide them in avoiding predatory lending practices

Components to Consider:

Defining Predatory Lending in the Cannabis Industry

Predatory lending benefits the lender and ignores or hinders the borrower’s ability to repay a debt. Predatory lenders often target communities where few other credit options exist, which makes it more difficult for borrowers to shop around. **If a lender charges triple-digit interest, does not check your credit score, or has a history of customer complaints,** there's a good chance the loan is predatory.

Predatory lending practices are becoming more and more prevalent throughout the U.S. This type of lending takes advantage of the borrower and benefits only the lender. Unfortunately, the practice of predatory lending is not always illegal. Still, it can leave borrowers with a ruined credit record, and an unmanageable debt burden and is a leading cause of homelessness.

Predatory lenders tend to target certain groups of people. These include:



- Minorities
- Elderly
- Poor

Predatory Lending Tactics to be Aware Of

Predatory tactics include:

- **Excessive and abusive fees**
- **Balloon payment:** This is one very large payment at the end of a loan's term, often used by predatory lenders to make your monthly payment look low. The problem is you may not be able to afford the balloon payment and will have to refinance, incur new costs, or default.
- **Loan flipping:** The lender pressures a borrower to refinance, again and again, generating fees and points for the lender each time. As a result, a borrower can end up trapped by an escalating debt burden.
- **Asset-based lending and equity stripping:** The lender grants a loan based on your asset, e.g. a home or a car, rather than on your ability to repay the loan. When you fall behind on payments, you risk losing your asset. Equity-rich, cash-poor older adults on fixed incomes may be targeted with loans (e.g. for a house repair) that they will have difficulty repaying and that will jeopardize their equity in their home.
- **Unnecessary add-on products or services,** such as single-premium life insurance for a mortgage.
- **Steering:** Lenders steer borrowers into expensive subprime loans, even when their credit history and other factors qualify them for prime loans.
- **Reverse redlining:** Redlining, the racist housing policy that effectively blocked Black families from getting mortgages, was outlawed by the Fair Housing Act of 1968.²³ In a kind of reverse redlining, minority business owners are often targeted by predatory and subprime lenders.
- **Bait and switch:** The bait and switch tactic lures borrowers with special offers and then changes course once the borrower has committed.
- **Black and Latinx homeowners particularly affected:** Predatory mortgage lenders targets Black and Latinx homeowners aggressively in predominantly minority neighborhoods, regardless of their income or creditworthiness. Even after controlling for credit score and other risk factors such as loan-to-value (LTV) ratios, subordinate liens, and debt-to-income (DTI) ratios, data shows that Black Americans and Latinos were more likely to receive subprime loans at higher costs.
- **Prepayment Penalty or Fees:** Fees that lenders may attempt to charge and/or over charge if you pay off your loan early.



How to Avoid Predatory Lending

Knowing the right questions to ask is key, as many predatory lenders are viewed as established institutions such as banks, finance companies, mortgage brokers, attorneys, or real estate contractors.

- **Educate yourself:** Becoming more financially literate helps borrowers spot red flags and avoid questionable lenders. [The FDIC has tips for protecting yourself](#) when you take on a mortgage, including instructions for canceling private mortgage insurance (PMI), which is paid for by the borrower but protects the lender. FDIC also facilitates a [MoneySmart Podcast](#) with tips on how to protect yourself while borrowing.
- **Seek a variety of options:** Shop around for your loan before you sign on the dotted line. If you've experienced lending discrimination in the past, you'll understandably want to get the process over with as soon as possible. Don't let the lenders win this time; comparing offers will give you an advantage.
- **Ask questions:** Don't be afraid to ask lenders the same questions that they are asking of you. You need to understand what they have to offer you and your business. What is their investment portfolio? How successful are their investments? How familiar are they with the cannabis industry? The right questions are just as important to you and your business as it is to them.

Here are some tips to help you stay ahead of the game!

- **Know what you are looking for.**
- **Know industry standards.**
- **Do your due diligence.**
- **Use accredited lenders.**
- **Do your homework, shop around.**
- **Borrow only what you need.** Many predatory lenders will try to talk borrowers into signing for a loan that is larger than they need. The whole point of this is to get the borrower to default on the loan.
- **Be aware of lenders trying to provide more than you need.** If a lender is not concerned about your employees' finances, then they're probably more interested in having them default.
- **Seek out and identify red flags.** Before signing a loan agreement, fully understand the terms of the loan. Lenders who fail to define the terms are usually an indication of a predatory lender.
- **Make sure the terms are what you can afford.** Predatory lenders often try to structure



loan repayments so that they are virtually impossible to pay back. One common tactic is only charging the borrower the interest rate, which means they are never paying down the principal.

- **Beware of special offers or attractive terms.** Predatory lenders often make special offers to entice the borrower, but then have the borrower sign a loan agreement with a different set of terms
- **Be aware of any prepayment penalties:** These fees are incurred when the borrower tries to pay off the loan early or refinance the loan. Prepayment fees can be exorbitant.
- **Look out for hidden balloon payments.** This is a high fee that is due at the end of the loan. It is not disclosed to the borrower before they sign the contract. The borrower is encouraged to take this loan because of the lower upfront payments but then struggles to make payments later in the term of the loan.
- **If a lender charges triple-digit interest, does not check your credit score, or has a history of customer complaints,** there's a good chance the loan is predatory.

What To Do if You Are a Victim

The best method of escaping predatory loans is to avoid them in the first place. There are, however, a few things you can try:

- Report the Lender
- Use Your Right of Rescission
- Sue the Lender
- Refinance the Loan

Additional Terms and Concepts to Consider

- **Convertible Notes:** A form of short-term debt that converts into equity, typically in conjunction with a future financing round.
- **Debt vs Equity Deals:** Debt financing involves the borrowing of money and paying it back with interest. The most common form of debt financing is a loan. Debt financing sometimes comes with restrictions on the company's activities that may prevent it from taking advantage of opportunities outside the realm of its core business. Equity financing involves selling a portion of a company's equity in return for capital. The main advantage of equity financing is that there is no obligation to repay the money acquired through it.
- **Term Sheet:** A nonbinding agreement that shows the basic terms and conditions of an investment. The term sheet outlines the material terms and conditions of a potential business agreement, establishing the basis for future negotiations between a seller and buyer.



- **Payment Terms:** Payment terms provide clear details about the expected payment on a sale. Often, payment terms are included on an invoice and specify how much time the buyer must make payment(s) on the purchase.



Accounting and Taxes for Cannabis Businesses

Purpose: This course will provide a comprehensive overview and breakdown of accounting, tax law compliance, and guidelines. The course will also focus on 26 U.S.C. § 280E.

Learning Objectives: Participants will understand tax compliance, practices, violations, projections, and documentation associated with a cannabis business. Participants will understand procedures to ensure accurate recordkeeping, including inventory protocols in compliance with 935 CMR 500.105(8)(9). Participants will draft a written recordkeeping operating procedure and a checklist of required tax documents and next steps.

Regulations to Cover:

- 500.015 (8-9): General Operational Requirements for Marijuana Establishments
 - Inventory and Transfer
 - Recordkeeping

Components to Consider:

Accounting

- General financial records and accounting principles
- Assets and liabilities
- Monetary transactions
- Books of accounts, which include journals, ledgers, supporting documents, agreements, checks, invoices, and vouchers
- Sales records

Cannabis Taxes

- General tax documents and principals
- 26 U.S.C § 280E



- Tax compliance for cannabis businesses
- Violations
- Projections
- Open data platform: <https://masscannabiscontrol.com/open-data/>

Inventory and Transfer

- Real-time Inventory:
 - Shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d) including, at a minimum, an inventory of cannabis plants; cannabis plant-seeds and clones in any phase of development such as propagation, vegetation, and flowering; cannabis ready for dispensing; all cannabis products; and all damaged, defective, expired, or contaminated cannabis and cannabis Products awaiting disposal. A Marijuana Establishment shall:
 - Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of cannabis products in the process of cultivation, and finished, stored cannabis;
 - Conduct a monthly inventory of cannabis in the process of cultivation and finished, stored cannabis;
 - Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
 - Promptly transcribe inventories if taken by use of an oral recording device.
- Inventory Record:
 - Record of inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.
 - A Marijuana Establishment shall attach plant tags to all cannabis, clones, and plants and attach package tags to all finished cannabis and cannabis products, and track all cannabis seeds, clones, plants, and cannabis products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- Recordkeeping:
 - Records of a Marijuana Establishment must be available for inspection by the Commission, on request. The financial records of a Marijuana Establishment shall be maintained in accordance with generally accepted accounting principles. Written records that are required and are subject to inspection include, but are not necessarily limited to, all records required in any section of 935 CMR 500.000, in addition to the following:
 - Written Operating Procedures as required by 935 CMR 500.105(1);
 - Inventory Records as required by 935 CMR 500.105(8);



- Seed-to-sale Tracking Records for all cannabis products as required by 935 CMR 500.105(8)(e);
- The following personnel records:
 - Job descriptions for each employee and volunteer position, as well as organizational charts consistent with the job descriptions;
 - A personnel record for each Marijuana Establishment agent. Such records shall be maintained for at least 12 months after termination of the individual's affiliation with the Marijuana Establishment and shall include, at a minimum, the following:
 - All materials submitted to the commission pursuant to 935 CMR 500.030(2);
 - Documentation of verification of references;
 - The job description or employment contract that includes duties, authority, responsibilities, qualifications, and supervision;
 - Documentation of all required training, including training regarding privacy and confidentiality requirements, and the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters;
 - Documentation of periodic performance evaluations;
 - A record of any disciplinary action taken; and
 - Notice of completed responsible vendor and eight-hour related duty training.
 - A staffing plan that will demonstrate accessible business hours and safe cultivation conditions;
 - Personnel policies and procedures; and
 - All background check reports obtained in accordance with M.G.L c. 6 § 172, 935 CMR 500.029, 935 CMR 500.030, and 803 CMR 2.00: Criminal Offender Record Information (CORI).
- Business records, which shall include manual or computerized records of:
 - Assets and liabilities;
 - Monetary transactions;
 - Books of accounts, which shall include journals, ledgers, and supporting documents, agreements, checks, invoices, and vouchers;
 - Sales records including the quantity, form, and cost of cannabis products; and
 - Salary and wages paid to each employee, or stipend, executive compensation, bonus, benefit, or item of value paid to any persons having direct or indirect control over the marijuana establishment.
 - Waste disposal records as required under 935 CMR 500.105(12); and
 - Following closure of a Marijuana Establishment, all records must be kept for at



least two years at the expense of the Marijuana Establishment and in a form and location acceptable to the Commission.



Municipal Approval Process

Purpose: This course will provide a comprehensive breakdown of the municipal process, including the differences between municipality requirements, how the municipal process relates to the application for licensure at the state level, and the processes and municipal documentation required for community outreach meetings and the application for a Marijuana Establishment, per 935 CMR 500.101(a)(6)(7)(8)(9)(10).

Learning Objectives: Participants will understand the municipal process, documentation requirements, and how to navigate the process including bans and zoning. Participants will develop a clear strategy for their community outreach meetings and next steps. Participants will be briefly introduced to Host Community Agreements (HCAs) requirements.

Regulations to Cover:

- 500.101 (a)(8): Application Requirements - Application of Intent
- 500.170: Municipal Requirements

Components to Consider:

What is a Municipality

- 351 Cities and Towns in Massachusetts

Differences Between Each Municipality

- Define bans, moratoriums, and zoning
- Understanding the municipal bylaws and zoning laws - what are bylaws and zoning laws and where can they be found?
- Differences between municipal process/es and state process and how are they related

Navigating the Municipal Process?

- Where to begin and who to contact

Contacts vary by municipality, licensees/applicants should begin with City Councilors/Alderman, local civic or community advocacy groups, zoning boards, and city and



town websites. Applicants should start at the municipal level first as it is important to follow the municipal process.

Community Outreach Meeting

An important requirement in the application process for licensure as an adult use Marijuana Establishment is the Community Outreach Meeting.

Community outreach and engagement can be done successfully by being informed and prepared to share information about a proposed Marijuana Establishment.

The Community Outreach Meeting must be documented in the Application of Intent packet and must be conducted within six months prior to filing the Application of Intent. For example, if an applicant files its Application of Intent on November 1, 2018, the Community Outreach Meeting must have occurred after May 1, 2018.

Where to Hold the Meeting: Check with the city or town and local civic associations groups on best places to hold the meeting. It is difficult to predict how many people will attend a Community Outreach Meeting, so you may want to find a large assembly space, city or town halls, local schools, or other places of assembly. Any space used should be accessible under the Americans with Disabilities Act Accessibility Guidelines.

Meeting Notice: An applicant must ensure that the meeting notice includes the time, place, and subject matter of the meeting and the proposed address of the Marijuana Establishment. A template is available on MassCannabisControl.com.

At least 7 calendar days prior to the meeting, the notice must be:

- Published in a newspaper of general circulation in the city or town (please make sure to check the newspaper's publishing deadlines to make sure you give yourself sufficient time);
- Filed with the town or city clerk, the planning board, the contracting authority for the municipality, and local licensing authority for adult use of cannabis, if applicable; and
- Mailed to abutters of the proposed address of the Marijuana Establishment, owners of land directly opposite on any public or private street or way, and to the abutters (neighbors) within 300 feet of the property line of the petitioner as they appear on the most recent applicable tax list, notwithstanding that the land of any such owner is located in another city or town (the town or city clerk may be able to assist with the abutters list).



Conducting the Meeting: The purpose of the Community Outreach Meeting is to explain the proposed Marijuana Establishment’s purpose and provide information about potential impacts to the neighborhood and community as a whole. Applicants should consider asking a respected community member to run the meeting as a neutral facilitator, such as a town moderator, other municipal official, or community leader. The applicant may wish to consider doing a presentation of their proposal first, including all the essential information discussed below, then allowing an opportunity for the public to ask questions. It may be helpful to have visuals for the audience, such as pictures of the location as it is currently and how it would look once completed, and enough information regarding security measures to provide reassurance without compromising the security plan.

Essential Information for the Community Outreach Meeting: An applicant will need to have the following information gathered prior to the meeting:

- Location of the proposed Marijuana Establishment
- What type(s) of Marijuana Establishment will be sited at the location?
- Is the proposed Marijuana Establishment allowed under current zoning bylaws/ordinances or is a zoning amendment required for the site?
- Is the proposed Marijuana Establishment allowed by right or does it require local zoning permitting? What permits are required?
- Is there a local licensing regulation pertaining to Marijuana Establishments?
- Is there a local Board of Health regulation pertaining to Marijuana Establishments?
- Does the proposed location comply with the 500-foot buffer zone from existing public or private school buildings (K-12)? Do local bylaws or ordinance create a smaller buffer zone?
- If the applicant is moving into an existing building or building a new one, will its premises comply with the security requirements set forth in 935 CMR 500?
- What steps will be taken by the Marijuana Establishment to prevent diversion to minors?
- Information demonstrating how the applicant intends to ensure that the location will not constitute a nuisance to the community as defined by law
- A plan for how the Marijuana Establishment will positively impact the community. If the applicant is a marijuana retailer, be aware of whether the municipality has passed the local tax option and be prepared to answer questions
- Be familiar with the Host Community Agreement requirements and be prepared to answer questions about them



Municipal Requirements and Documents needed at the Municipal Level to Complete State Process

- Municipal Application (if applicable)
- Outreach Meeting
- Host Community Agreement –why is this important to the state process
- Location – letters of Intent for space or other documentation



Host Community Agreements (HCAs)

Purpose: This course will provide a comprehensive overview of Host Community Agreements (HCAs) and navigating the municipal process involved.

Learning Objectives: Participants will understand the purpose of HCAs, and how to execute a reasonable agreement with the municipality. Participants will develop a community outreach meeting strategy and a checklist of next steps.

Regulations to Cover:

- 500.101 (a) (8): Application Requirements - Application of Intent

Components to Consider:

What is a Host Community Agreement (HCA)?

Under state law, Marijuana Establishments and Medical Marijuana Treatment Centers must execute Host Community Agreements with the municipalities (Host Communities) in which they plan to operate. The HCA identifies the stipulations and responsibilities of both the municipality and the applicant or licensee.

A Marijuana Establishment with multiple physical locations, such as a craft marijuana cultivation cooperative, must execute an HCA for each municipality in which it has a physical presence.

Negotiating HCAs

As with any agreement, terms should be negotiated between willing parties to the contract. In this context, the parties to the HCA are the owners or otherwise authorized representatives of the Marijuana Establishment and the contracting authority for the municipality. The parties should negotiate and agree to their respective responsibilities. The parties should also be aware of and abide by the constraints imposed by the plain language of M. G. L. c. 94G, § 3(d). It is clear from the statute, that the Legislature intended for a municipality to act reasonably in negotiating with a



Marijuana Establishment that seeks to operate within its community. The costs and impacts of hosting a Marijuana Establishment will understandably vary from municipality to municipality and negotiated HCAs should reflect the impacts on the host community.

It is also important that the parties to the HCA be mindful of not only the statutory language in M. G. L. c. 94G, but also the context in which an HCA is required to be negotiated. Applicants for licensure as a Marijuana Establishment are strongly encouraged to seek legal advice from a licensed attorney regarding the negotiation of an HCA.

Legality and Contents of the HCAs

Section 3(d) of chapter 1 94G should be read in conjunction with M. G. L. 64H and 64N, the statutes that allow for the taxation of adult-use marijuana. Taken together, these statutes authorize and limit the assessments allowed on marijuana, marijuana products and Marijuana Establishments. All HCAs should include terms that describe the conditions that the municipality and Marijuana Establishment must satisfy for that establishment to operate within that host community. Individual conditions can vary widely.

Taxes

The Legislature explicitly authorized municipalities to adopt an optional local excise tax of up to 3%, as applied to retail transactions, in addition to state sales and excise taxes. In so doing, the Legislature established the ceiling for state-authorized taxes that may be assessed on a Marijuana Establishment:

- the 6.25% sales tax;
- the 10.75% excise tax on marijuana and marijuana products; and
- the optional 3% local tax, which may be applied to retail sales only.

Community Impact Fee

The community impact fee authorized by G.L. c. 94G, § 3(d) is optional and separate and apart from the taxes described above. To be authorized, a community impact fee included in an HCA must meet certain legal requirements. The fee charged must be in exchange for a benefit that is sufficiently specific and special to the Marijuana Establishment and assessed in such a way that it justifies assessing the cost to this limited group as opposed to the general public, even if the public sees some benefit. Moreover, the fee should be reasonably designed to compensate the municipality for the costs of providing the benefit. Accordingly, any HCA structured consistent with G. L. c. 94G, § 3(d), may include a community impact fee, provided that the community impact fee does not amount to more than 3% of the gross annual sales of the Marijuana Establishment and meets the legal requirements of permissible fees. A community impact fee



included in an HCA must be more than simply called a community impact fee; it must be structured appropriately.

Term

The community impact fee is limited to a term of 5 years. At, or before, the conclusion of the term of the preceding community impact fee, the parties may choose to negotiate a new, optional community impact fee which shall similarly be limited to a term of 5 years or less.

Additional Tools and Resources

- <https://masscannabiscontrol.com/host-community-agreement/>



Agent Recruitment and Training

Purpose: This course will provide a comprehensive overview of how to recruit, register, and train Marijuana Establishment agents per 935 CMR 500.0029 through 935 CMR 500.033. § 280E.

Learning Objectives: Participants will understand the registration process of Marijuana Establishment agents as well as denial, revocation, and voidance of registration cards per regulations. Participants will also develop a recruitment plan and understand qualifications and required training(s) for Marijuana Establishment agents.

Regulations to Cover:

- 500.030: Registration of Marijuana Establishment Agents
- 500.029: Registration and Conduct of Laboratory Agents
- 500.005 (2-3): Fees
 - Registration Card Holder Fees
 - Fingerprint-based Criminal Background Checks Fees
- 500.031: Denial of a Marijuana Establishment Agent Registration Card
- 500.032: Revocation of a Marijuana Establishment Agent Registration Card
- 500.033: Void Registration Cards
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent
- 500.803: Suitability Standard for Registration as a Laboratory Agent

Components to Consider:

What/Who is a Marijuana Establishment Agent:

Definitions:

- A Marijuana Establishment Agent is a board member, director, employee, Executive, manager, or volunteer of a Marijuana Establishment, who is 21 years of age or older. Employee includes a consultant or contractor who provides on-site services to a Marijuana Establishment related to the cultivation, harvesting, preparation, packaging,



storage, testing, or dispensing of cannabis.

- A Laboratory Agent is an employee of an Independent Testing Laboratory registered in accordance with 935 CMR 500.029, who transports, possesses or tests cannabis in compliance with 935 CMR 500.000.
- A Registration Card or Agent Registration Card is an identification card issued by the Commission to a Marijuana Establishment or Laboratory Agent. The Registration Card allows access into Commission-supported databases. The Registration Card facilitates verification of an individual Registrant's status including, but not limited to, the identification by the Commission and Law Enforcement Authorities of those individuals who are exempt from Massachusetts criminal and civil penalties under St. 2016, c. 334 as amended by St. 2017, c. 55, and 935 CMR 500.000.
- A Card Holder is a Registered Qualifying Patient, Personal Caregiver, Marijuana Establishment Agent, Medical Marijuana Treatment Center (MTC) Agent, or Laboratory Agent who holds a valid patient or Agent Registration Card

Registration Application of Marijuana Establishment Agents

- A Marijuana Establishment shall apply for registration for all its board members, directors, employees, Executives, managers, and volunteers who are associated with that Marijuana Establishment. The Commission shall issue an Agent Registration Card to each individual determined to be suitable for registration. All such individuals shall:
 - be 21 years of age or older;
 - have not been convicted of an offense in the Commonwealth involving the distribution of controlled substances to minors, or a like violation of the laws of Other Jurisdictions; and be determined suitable for registration consistent with the provisions of 935CMR 500.800 and 935 CMR 500.801 or 935 CMR 500.802.
- An application for registration of a Marijuana Establishment Agent shall include:
 - Full name, date of birth, and address of the individual;
 - Aliases used previously or currently in use by the individual, including maiden name, if any;
 - Copy of the applicant's driver's license, government-issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;
 - Attestation that the individual will not engage in the diversion of Marijuana or Marijuana Products;
 - Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense Marijuana in the Commonwealth.



- Background information, including, as applicable:
 - Description and the relevant dates of any criminal action under the laws of the Commonwealth, or an Other Jurisdiction, whether for a felony or misdemeanor and which resulted in conviction, or guilty plea, or plea of nolo contendere, or admission of sufficient facts;
 - Description and the relevant dates of any civil or administrative action under the laws of the Commonwealth, or an Other Jurisdiction, relating to any professional or occupational or fraudulent practices;
 - Description and relevant dates of any past or pending denial, suspension, or revocation of a license or registration, or the denial of a renewal of a license or registration, for any type of business or profession, by any federal, state, or local government, or any foreign jurisdiction;
 - Description and relevant dates of any past discipline by, or a pending disciplinary action or unresolved complaint by, the Commonwealth, or an Other Jurisdiction, with regard to any professional license or registration held by the applicant;
 - a nonrefundable application fee paid by the Marijuana Establishment with which the Marijuana Establishment Agent will be associated; and
 - any other information required by the Commission.
- A Marijuana Establishment Executive registered with DCJIS pursuant to 803 CMR 2.04: iCORI Registration, shall submit to the Commission a CORI report and any other background check information required by the Commission for each individual for whom the Marijuana Establishment seeks a Marijuana Establishment Agent registration, obtained within 30 calendar days prior to submission.
 - The CORI report obtained by the Marijuana Establishment shall provide information authorized under Required Access Level 2 pursuant to 803 CMR 2.05(3)(a)2.
 - The Marijuana Establishment's collection, storage, dissemination and usage of any CORI report or background check information obtained for Marijuana Establishment Agent registrations shall comply with 803 CMR 2.00: Criminal Offender Record Information (CORI).
 - A Marijuana Establishment shall notify the Commission no more than one business day after a Marijuana Establishment Agent ceases to be associated with the establishment. The registration shall be immediately void when the agent is no longer associated with the establishment.
 - An Agent Registration Card shall be valid for one year from the date of issue and may be renewed on an annual basis on a determination by the Commission that the applicant for renewal continues to be suitable for registration.
- After obtaining a registration card for a Marijuana Establishment Agent:



- A Marijuana Establishment is responsible for notifying the Commission, in a form and manner determined by the Commission, as soon as possible, but in any event, within five business days of any changes to the information that the establishment was previously required to submit to the Commission or after discovery that a Registration Card has been lost or stolen.
- A Marijuana Establishment Agent shall always carry a Registration Card associated with the appropriate Marijuana Establishment while in possession of Marijuana or Marijuana Products, including at all times while at the establishment or while transporting Marijuana or Marijuana Products.
- A Marijuana Establishment Agent affiliated with multiple Marijuana Establishments shall be registered as a Marijuana Establishment Agent by each Marijuana Establishment and shall be issued an Agent Registration Card for each establishment.

Registration Fees

- Registration Card Fee
 - An applicant for a Registration Card as a Marijuana Establishment Agent, a Laboratory Agent, or any other position designated as an agent by the Commission shall pay a nonrefundable application fee of \$100 with any such application.
- Registration Card Renewal Fee:
 - An applicant for a renewal of a Registration Card as a Marijuana Establishment Agent, a Laboratory Agent, or any other position designated as an agent by the Commission shall pay a fee of \$100.
- Finger-print Criminal Background Check Fees:
 - All persons required to submit fingerprints shall pay a fee to be established by the Massachusetts Secretary of Administration and Finance, in consultation with Massachusetts Secretary of Public Safety and Security and the Commission, to offset the costs of operating and administering a Fingerprint-based criminal background-check system.
 - The Commission may pay the fee on behalf of applicants or reimburse applicants for all or part of the fee on the grounds of financial hardship.
 - Any fees collected from fingerprinting activity under 935 CMR 500.000 shall be deposited into the Fingerprint-based Background Check Trust Fund, established in M.G.L. c. 29, § 2HHH. 500.029:



Denial of a Marijuana Establishment Agent Registration Card:

- Each of the following, in and of itself, constitutes full and adequate grounds for denial of an Agent Registration Card for a Marijuana Establishment Agent, including Laboratory Agents:
 - Failure to provide the information required in 935 CMR 500.029 or 935 CMR 500.030 for an Agent Registration Card;
 - Provision of information on the application that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity;
 - Failure to meet the requirements set forth in 935 CMR 500.029 or 935 CMR 500.030 for an Agent Registration Card;
 - Revocation or suspension of an Agent Registration Card in the previous six months;
 - Failure by the Marijuana Establishment to pay all applicable fees; or
 - Other grounds, as the Commission may determine in the exercise of its discretion, that are directly related to the applicant's ability to serve as a Marijuana Establishment Agent, or that make the applicant unsuitable for registration; however, the Commission will provide notice to the applicant of the grounds prior to the denial of the Agent Registration Card and a reasonable opportunity to correct these grounds.
- The Commission may delegate a Registrants' suitability determinations to the Executive Director, who may appoint a Suitability Review Committee, in accordance with 935 CMR 500.800. Suitability determinations shall be based on credible and reliable information.
- Executive Director may institute a suitability review based on a recommendation from Enforcement staff that background check information would result in or could support an adverse suitability determination. All suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800.

Training of Marijuana Establishment Agents

- Compliance
- Standards of Procedures (SOPs)
- Industry best practices
- How to develop an employee training program and what to include



Revocation of a Marijuana Establishment Agent Registration Card

- Each of the following, in and of itself, constitutes full and adequate grounds for revocation of an Agent Registration Card issued to a Marijuana Establishment Agent, including Laboratory Agents:
 - Submission of information in the application or renewal application that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly, or by omission or ambiguity;
 - Violation of the requirements of the state marijuana laws, including 935 CMR 500.000;
 - Fraudulent use of a Marijuana Establishment Agent Registration Card including, but not limited to, tampering, falsifying, altering, modifying, duplicating, or allowing another person to use, tamper, falsify, alter, modify, or duplicate an Agent Registration Card;
 - Selling, transferring, distributing, or giving marijuana to any unauthorized person;
 - Failure to notify the Commission within five business days after becoming aware that the Agent Registration Card has been lost, stolen, or destroyed;
 - Failure to notify the Commission within five business days after a change in the registration information contained in the application, or required by the Commission to have been submitted in connection with the application for an Agent Registration Card, including open investigations or pending actions as delineated in 935 CMR 500.802, as applicable, that may otherwise affect the status of the suitability for registration of the Marijuana Establishment Agent;
 - Conviction, guilty plea, plea of nolo contendere, or admission to sufficient facts of a felony drug offense involving distribution to a minor in the Commonwealth, or a like violation of the laws of an Other Jurisdiction; or
 - Conviction, guilty plea, plea of nolo contendere or admission to sufficient facts in the Commonwealth, or a like violation of the laws of another state, to an offense as delineated in 935 CMR 500.802 or 935 CMR 500.803, as applicable, that may otherwise affect the status of the suitability for registration of the Marijuana Establishment Agent.
- In addition, a conviction of a felony drug offense in the Commonwealth, or a like violation of the laws of an Other Jurisdiction shall be adequate grounds for the revocation of a Marijuana Establishment Agent Registration Card.
- Other grounds as the Commission may determine in the exercise of its discretion, that are directly related to the applicant's ability to serve as a Marijuana Establishment Agent, that make the Registrant unsuitable for registration. The Commission will provide notice to the Registrant of the grounds prior to the revocation of an Agent Registration Card and a reasonable opportunity to correct these grounds.



- The Commission may delegate a Registrants' suitability determinations to the Executive Director, who may appoint a Suitability Review Committee, in accordance with 935 CMR 500.800. Suitability determinations shall be based on credible and reliable information.
- The Executive Director may institute a suitability review based on a recommendation from Enforcement staff that background check information would result in or could support an adverse suitability determination. All suitability determinations will be made in accordance with the procedures set forth in 935 CMR 500.800.

Void Registration Cards

- An Agent Registration Card issued to a Marijuana Establishment Agent, including a Laboratory Agent, shall be void when:
 - The agent has ceased to be associated with the Marijuana Establishment or Independent Testing Laboratory that applied for and received the agent's Registration Card;
 - The card has not been surrendered on the issuance of a new Agent Registration Card based on new information; or the agent is deceased
 - A void Agent Registration Card is inactive and invalid

Suitability Standard for Registration as a Marijuana Establishment Agent

- Where to find suitability tables (935 CMR 500.802 and 500.803)
- Process for determining suitability and suitability hearing



Branding, Marketing, and Advertising

Purpose: This course will provide a comprehensive overview of how to brand, market and advertise a cannabis business, as well as labeling and packaging design of cannabis and cannabis products per 935 CMR 500.105(4) through (7).

Learning Objectives: Participants will have a clear understanding of permitted and prohibited branding, marketing and advertising requirements. Participants will also understand labeling and packaging design limitations and will develop a branding, marketing and advertising strategy and checklist for next steps.

Regulations to Cover:

- 500.105 (4-7): General Operational Requirements for Marijuana Establishments
 - Marketing and Advertising Requirements

Components to Consider:

- What is Branding?
- What is Marketing?
- What is Advertising?

Branding, Marketing, and Advertising Requirements

- **Permitted Practices**
 - a. A Marijuana Establishment may develop a business name and logo to be used in labeling, signage, and other materials; provided however, that use of medical symbols, images of marijuana, or related paraphernalia images, that are appealing to persons younger than 21 years old, and colloquial references to cannabis are prohibited from use in this business name and logo;
 - b. Sponsorship of a charitable, sporting or similar event, except that advertising, marketing, and branding at or in connection with such an event is prohibited, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;



- c. A Marijuana Establishment may display, in secure, locked cases, samples of each product offered for sale and subject to the requirements of 935 CMR 500.110. These display cases may be transparent. An authorized Marijuana Establishment Agent may remove a sample of marijuana from the case and provide it to the consumer for inspection, provided that the consumer may not consume or otherwise use the sample, unless otherwise authorized herein;
- d. The establishment may post prices in the store and may respond to questions about pricing. The Marijuana Establishment shall provide a catalogue or a printed list of the prices and strains of marijuana available at the Marijuana Establishment to consumers, and may post the same catalogue or printed list on its website and in the retail store;
- e. A Marijuana Establishment may engage in reasonable marketing, advertising and branding practices that are not otherwise prohibited in 935 CMR 500.105(4)(b) that do not jeopardize the public health, welfare or safety of the general public or promote the diversion of marijuana or marijuana use in individuals younger than 21 years old. Any such marketing, advertising and branding created for viewing by the public shall include the statement "Please Consume Responsibly", in a conspicuous manner on the face of the advertisement and shall include a minimum of two of the following warnings in their entirety in a conspicuous manner on the face of the advertisement:
 - i. "This product may cause impairment and may be habit forming."
 - ii. "Marijuana can impair concentration, coordination and judgment. Do not operate a vehicle or machinery under the influence of this drug."
 - iii. "There may be health risks associated with consumption of this product."
 - iv. "For use only by adults 21 years of age or older. Keep out of the reach of children." or
 - v. "Marijuana should not be used by women who are pregnant or breastfeeding."
- f. All marketing, advertising and branding produced by or on behalf of a Marijuana Establishment shall include the following warning, including capitalization, in accordance with M.G.L. c. 94G, § 4(a½) (xxvi):
 - i. This product has not been analyzed or approved by the Food and Drug Administration (FDA). There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breastfeeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. **KEEP THIS PRODUCT AWAY FROM CHILDREN.** There may be health risks associated with consumption of this product. Marijuana can



impair concentration, coordination, and judgment. The impairment effects of Edible Marijuana Products may be delayed by two hours or more. In case of accidental ingestion, contact poison control hotline 1-800-222-1222 or 9-1-1. This product may be illegal outside of MA.”

- **Prohibited Practices**

- a. Advertising, marketing, and branding in such a manner that is deemed to be is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly or by omission or ambiguity;
- b. Advertising, marketing and branding by means of television, radio, internet, mobile applications, social media, or other electronic communication, billboard or other outdoor advertising, or print publication, unless at least 85% of the audience is reasonably expected to be 21 years of age or older as determined by reliable and current audience composition data;
- c. Advertising, marketing, and branding that utilizes statements, designs, representations, pictures or illustrations that portray anyone younger than 21 years old;
- d. Advertising, marketing, and branding including, but not limited to, mascots, cartoons, brand sponsorships and celebrity endorsements, that is deemed to appeal to a person younger than 21 years old;
- e. Advertising, marketing, and branding, including statements by a Licensee, that makes any false or statements concerning other Licensees and the conduct and products of such other Licensees that is deceptive, misleading, false or fraudulent, or that tends to deceive or create a misleading impression, whether directly or by omission or ambiguity;
- f. Advertising, marketing, and branding through certain identified promotional items as determined by the Commission including, but not limited to, gifts, giveaways, discounts, points-based reward systems, customer loyalty programs, coupons, or "free" or "donated" marijuana;
- g. Advertising, marketing, and branding by a Licensee that asserts that its products are safe, or represent that its products have curative or therapeutic effects, other than labeling required pursuant to M.G.L. c. 94G, § 4(a½) (xxvi), unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor as determined by the Commission;
- h. .Advertising on any billboards, or any other public signage, which fails to comply with all state and local ordinances and requirements;
- i. Installation of any illuminated, neon, or external signage beyond the period of 30 minutes before sundown until closing, provided however, that the Commission



- may further specify minimum signage requirements;
- j. The use of vehicles equipped with radio or loudspeakers for the advertising of marijuana;
 - k. The use of radio or loudspeaker equipment in any Marijuana Establishment for the purpose of attracting attention to the sale of marijuana;
 - l. Advertising, marketing, and branding at, or in connection with, a charitable, sporting or similar event, unless at least 85% of the audience is reasonably expected to be 21 years of age or older, as determined by reliable, current audience composition data;
 - m. Operation of any website of a Marijuana Establishment that fails to verify that the entrant is 21 years of age or older;
 - n. Use of unsolicited pop-up advertisements on the internet or text message;
 - o. Any advertising of an improper or objectionable nature including, but not limited to, the use of recipe books or pamphlets for marijuana products which contain obscene or suggestive statements;
 - p. Advertising, marketing or branding of marijuana products on clothing, cups, drink holders, apparel accessories, electronic equipment or accessories, sporting equipment, novelty items and similar portable promotional items;
 - q. Advertising, marketing or branding, on or in public or private vehicles and at bus stops, taxi stands, transportation waiting areas, train stations, airports, or other similar transportation venues including, but not limited to, vinyl-wrapped vehicles or signs or logos on transportation vehicles or company cars;
 - r. Advertising, marketing, branding, signs or other printed matter advertising any brand or kind of marijuana products that are displayed on the exterior or interior of any licensed premises where marijuana products are not regularly and usually kept for sale;
 - s. Advertising or marketing of the price of marijuana products, except as permitted above pursuant to 935 CMR 500.105(4)(a); and
 - t. Display of marijuana products to be clearly visible to a person from the exterior of a Marijuana Establishment.
 - i. Nothing in 935 CMR 500.105(4) prohibits a Marijuana Establishment from using a mark provided by the Commission which uses images of marijuana.

Packaging of Marijuana and Marijuana Products

- Tamper or Child-resistant Packaging
 - a. Licensees licensed subject to 935 CMR 500.050(5) shall ensure that all marijuana



products, other than those offered at wholesale by a Marijuana Cultivator, that are provided for sale to consumers by a Licensee shall be sold in tamper or child-resistant packaging. To be in compliance with 935 CMR 500.105(6), Licensees shall ensure:

- i. That to the extent it is not unreasonably impracticable for the specific type of product, marijuana products are packaged in containers that are:
 - a. Opaque and plain in design;
 - b. Not be able to be opened easily with scissors if appealing to children;
 - c. Resealable for any marijuana product intended for more than a single use or containing multiple servings; and
 - d. Certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging follows the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700;
- ii. Where compliance with the requirements of tamper or child-resistant packaging is deemed to be unreasonably impracticable, marijuana products shall be placed in an exit package that is:
 - a. Capable of being resealed and made tamper or child-resistant again after it has been opened;
 - b. Includes the following statement, including capitalization, in at least ten-point Times New Roman, Helvetica or Arial font: "KEEP OUT OF REACH OF CHILDREN."; and
 - c. Is certified by a qualified third-party tamper or child-resistant packaging testing firm that the packaging follows the most recent poison prevention packaging regulations of the US Consumer Product Safety Commission as included at 16 CFR 1700.

- Limits on Packaging Design

- a. Packaging for marijuana products sold or displayed for consumers, including any label or imprint affixed to any packaging containing marijuana products or any exit packages, shall not be attractive to minors. Packaging is explicitly prohibited from:
 - iii. Using bright colors, defined as colors that are "neon" in appearance;
 - iv. Imitating or having a semblance to any existing branded consumer products, including foods and beverages, that do not contain marijuana;
 - v. Featuring cartoons;



- vi. Featuring a design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;
 - vii. Featuring symbols or celebrities that are commonly used to market products to minors;
 - viii. Featuring images of minors; and
 - ix. Featuring words that refer to products that are commonly associated with minors or marketed to minors.
- Packaging of Multiple Servings
 - a. Packaging for marijuana products sold or displayed for consumers in multiple servings shall include the following statement on the exterior of the package in a printed font that is no smaller than ten-point Times New Roman, Helvetica or Arial, including capitalization: "INCLUDES MULTIPLE SERVINGS".
 - b. Packaging for marijuana products in solid form sold or displayed for consumers in multiple servings shall allow a consumer to easily perform the division into single servings.
 - c. Edible marijuana products in a solid form shall be easily and permanently scored to identify individual servings. Notwithstanding 935 CMR 500.105(6)(c)2. a., where a product is unable, because of its form, to be easily and permanently scored to identify individual servings, the product shall be packaged in a single serving size. The determination of whether a product is able to be easily and permanently scored shall be decided by the Commission consistent with sub-regulatory guidelines established by the Commission and provided to Licensees.
 - d. Marijuana infused beverages shall be packaged solely in a single serving size. Multiple serving beverages are strictly prohibited for sale.
 - e. Each single serving of an edible marijuana product contained in a multiple-serving package shall be marked, stamped or otherwise imprinted with the symbol issued by the Commission under 935 CMR 500.105(5) that indicates that the single serving is a marijuana product.
 - f. Serving size shall be determined by the processor, but in no instance shall an individual serving size of any marijuana product contain more than five milligrams of delta-nine-tetrahydrocannabinol (Δ 9-THC) subject to the testing variance specified in 935 CMR 500.160(11).
 - Packaging and Labeling Pre-approval
 - a. Prior to a marijuana product being sold at a Marijuana Establishment, a Licensee or License applicant may submit an application, in a form and manner determined by the Commission, for packaging and label approval to the Commission. The Commission may charge a fee for packaging and labeling pre-approval. The packaging and labeling pre-approval process shall in no way substitute for



compliance with 935 CMR 500.105(4) through (6).

Labeling of Marijuana and Marijuana Products

- **Labeling of Marijuana Not Sold as a Marijuana Product: Marijuana Cultivators**

- a. Prior to marijuana being sold or transferred, a Marijuana Cultivator shall ensure the placement of a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each package of marijuana that it makes available for retail sale, containing at a minimum the following information:
 - i. The name and registration number of the Marijuana Cultivator that produced the marijuana, together with the retail Licensee's business telephone number, electronic mail address, and website information, if any;
 - ii. The quantity of usable marijuana contained within the package;
 - iii. The date that the Marijuana Retailer or Marijuana Cultivator packaged the marijuana;
 - iv. A batch number, sequential serial number, and barcode when used, to identify the batch associated with manufacturing and processing;
 - v. The full cannabinoid profile of the marijuana contained within the package, including THC and other cannabinoid level;
 - vi. A statement and a seal certifying that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
 - vii. This statement, including capitalization; "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breast-feeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. "KEEP THIS PRODUCT AWAY FROM CHILDREN.";
 - viii. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



- ix. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:





- x. 935 CMR 500.105(5)(a) shall not apply to marijuana packaged by a Marijuana Cultivator for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13), provided however, that the retailer is responsible for compliance with 935 CMR 500.105(5) for all marijuana products sold or displayed for consumers.

- **Labeling of Edible Marijuana Products: Marijuana Product Manufacturer**

- a. Prior to edible marijuana products being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each edible marijuana product that it prepares for retail sale or wholesale, containing at a minimum the following information:
 - i. The name and registration number of the Marijuana Product Manufacturer that produced the marijuana product, together with the Marijuana Product Manufacturer's business telephone number, e-mail address, and website information, if any;
 - ii. The name of the marijuana product;
 - iii. Refrigeration of the product is required, as applicable;
 - iv. Net weight or volume in US customary and metric units;
 - v. The quantity of usable marijuana contained within the product as measured in ounces;
 - vi. The type of marijuana used to produce the product, including what, if any, Processing technique or solvents were used;
 - vii. A list of ingredients, including the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine-tetrahydrocannabinol (Δ 9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
 - viii. The serving size of the marijuana product in milligrams;
 - ix. The number of serving sizes within the marijuana product based on the limits provided in 935 CMR 500.150;
 - x. The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving;
 - xi. The date of creation and the recommended "use by" or expiration date which shall not be altered or changed;
 - xii. A batch number, sequential serial number and barcodes when used, to



- identify the batch associated with manufacturing and processing;
- xiii. Directions for use of the marijuana product;
- xiv. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
- xv. A warning if nuts or other known allergens are contained in the product; and
- xvi. This statement, including capitalization: “The impairment effects of edible products may be delayed by two hours or more. This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breastfeeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;
- xvii. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



- xviii. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



- xix. 935 CMR 500.105(5)(b) shall apply to edible marijuana products produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13) and shall be in addition to any regulation regarding the appearance of edible marijuana products under 935 CMR 500.150.

- **Labeling of Marijuana Concentrates and Extracts: Product Manufacturers**

- a Prior to marijuana concentrates or extracts being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each marijuana concentrate container that it prepares for retail sale or wholesale, containing at a minimum the following information:
 - i. The name and registration number of the Marijuana Product Manufacturer that produced the marijuana product, together with the Marijuana Product



- Manufacturer's business telephone number, e-mail address, and website information, if any;
- ii. The name of the marijuana product;
 - iii. Product identity including the word "concentrate" or "extract" as applicable;
 - iv. Net weight or volume expressed in US customary units and metric units;
 - v. The type of Marijuana used to produce the product, including what, if any, processing technique or solvents were used;
 - vi. A list of ingredients including, but not limited to, the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine-tetrahydrocannabinol (Δ 9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume, and the amount of specific additives infused or incorporated during the manufacturing process, whether active or inactive, including, but not limited to, thickening agents, thinning agents, and specific terpenes, expressed in absolute terms and as a percentage of volume, and in a form and matter determined by the Commission.
 - vii. A statement of the serving size and number of servings per container or amount suggested for use based on the limits provided in 935 CMR 500.150;
 - viii. The date of creation and the recommended "use by" or expiration date;
 - ix. A batch number, sequential serial number, and barcode when used, to identify the batch associated with manufacturing and processing;
 - x. Directions for use of the marijuana product;
 - xi. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
 - xii. A warning if nuts or other known allergens are contained in the product;
 - xiii. This statement, including capitalization: "This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breastfeeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.";
 - xiv. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:





- xv. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



- xvi. 935 CMR 500.105(5)(c) shall apply to marijuana concentrates and extracts produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(3).

• **Labeling of Marijuana Infused Tinctures and Topicals**

- a Prior to marijuana infused tinctures or topicals being sold or transferred, the Marijuana Product Manufacturer shall place a legible, firmly affixed label on which the wording is no less than 1/16 inch in size on each container of marijuana infused tincture or topical that it prepares for retail sale or wholesale, containing at a minimum the following information:
- i. The name and registration number of the Marijuana Product Manufacturer that produced the marijuana product, together with the Marijuana Product Manufacturer's business telephone number, e-mail address, and website information, if any;
 - ii. The marijuana product's identity;
 - iii. The type of marijuana used to produce the product, including what, if any, processing technique or solvents were used;
 - iv. A list of ingredients, including the full cannabinoid profile of the marijuana contained within the marijuana product, including the amount of delta-nine-tetrahydrocannabinol (Δ 9-THC) and other cannabinoids in the package and in each serving of a marijuana product as expressed in absolute terms and as a percentage of volume;
 - v. Net weight or volume as expressed in US customary units or metric units;
 - vi. The date of product creation;
 - vii. A batch number, sequential serial number, and barcode when used, to identify the batch associated with manufacturing and processing;
 - viii. Directions for use of the marijuana product
 - ix. A statement and a seal that the product has been tested for contaminants, that there were no adverse findings, and the date of testing in accordance with M.G.L. c. 94G, § 15;
 - x. A warning if nuts or other known allergens are contained in the product;



and

- xi. This statement, including capitalization: “This product has not been analyzed or approved by the FDA. There is limited information on the side effects of using this product, and there may be associated health risks. Marijuana use during pregnancy and breastfeeding may pose potential harms. It is against the law to drive or operate machinery when under the influence of this product. KEEP THIS PRODUCT AWAY FROM CHILDREN.”;
- xii. The following symbol or easily recognizable mark issued by the Commission that indicates the package contains marijuana product:



- xiii. The following symbol or other easily recognizable mark issued by the Commission that indicates that the product is harmful to children:



- xiv. 935 CMR 500.105(5)(d) shall apply to marijuana infused tinctures and topicals produced by a Marijuana Product Manufacturer for transport to a Marijuana Retailer in compliance with 935 CMR 500.105(13). (e) In circumstances where the labeling of the marijuana product is unreasonable or impractical, the Marijuana Establishment may include the labeling information on a peel-back label or may place the product in a sealed bag with an insert or additional, easily readable label firmly affixed to that bag.



Application and Licensing Process: Retail

Purpose: This course will provide a comprehensive overview and breakdown of the licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). The course will also provide an overview of the difference between the state and local components, and there will be built-in time for group application walk-through.

Learning Objectives: Participants will receive hands-on, group and one-on-one application walk-through to help them understand the licensing application process, how to successfully apply, the difference between state and local components of the process, and application guidelines specific to their retail license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

Regulations to Cover:

- 500.100: Application for Licensing of Marijuana Establishments
- 500.101: Application Requirements
- 500.102: Action on Applications
- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110: Security Requirements for Marijuana Establishments
- 500.140: Additional Operational Requirements for Retail Sale

Components to Consider:

State vs. Local Approval Process

- Difference between the state and local or municipal level components of the approval process
- Local: real estate, community outreach meeting, host community agreement, plan to comply with local zoning code, ordinance, or bylaws
- State: application of intent, background check, management and operations profile



State Application Process and Requirements

- MassCIP portal
- Application of intent
 - Required individuals and entities
 - Disclosures of In-State and Out-of-State interests
 - Capital resources
 - Bond or Escrow
 - Property identification and interest documentation
 - Host Community Agreement certification
 - Community outreach meeting attestation and documentation
 - Plans to remain compliant with local ordinances
 - Plan to positively impact disproportionately harmed people
 - Proof of residency for microbusinesses and craft marijuana cooperatives
- Background check
 - Background check information
 - Background authorization forms
- Management and operations profile
 - Business information, articles of organization, and bylaws
 - Certificate of good standing
 - Business plan, liability insurance plan, and proposed timeline
 - Summary of operating plans, policies, and procedures
 - Diversity plan
- Additional requirements for Retail license type
 - Applicants for licensure as a Marijuana Retailer shall include a detailed description of the applicant's proposed plan for obtaining marijuana from licensed MEs in the Management and Operations Profile section.

Suitability Standards

- What are suitability standards?
- Where to find suitability tables
- Suitability determination process

Application Fees and Annual License Fees

- Application fees waived for SEP applicants with 10% ownership, with the exception of Delivery-Only and Social Consumption license types which require SEP participants to



maintain majority (51%) ownership.

- Annual license fees reduced by 50%
- The fees for adult-use applications and licenses are as follows:

License Types	Application Fees (Indoor/Outdoor)	Annual License Fee (Indoor/Outdoor)
Marijuana Cultivator (Indoor or Outdoor)		
Tier 1: up to 5,000 square feet	\$200 (I)/\$100 (O)	\$1,250 (I)/\$625 (O)
Tier 2: 5,001 to 10,000 sq. ft.	\$400 (I)/\$200 (O)	\$2,500 (I)/\$1,250 (O)
Tier 3: 10,001 to 20,000 sq. ft.	\$600 (I)/\$300 (O)	\$5,000 (I)/\$2,500 (O)
Tier 4: 20,001 to 30,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$20,000 (I)/\$10,000 (O)
Tier 5: 30,001 to 40,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$22,500 (I)/\$11,250 (O)
Tier 6: 40,001 to 50,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$25,000 (I)/\$12,500 (O)
Tier 7: 50,001 to 60,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$30,000 (I)/\$15,000 (O)
Tier 8: 60,001 to 70,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$35,000 (I)/\$17,500 (O)
Tier 9: 70,001 to 80,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$40,000 (I)/\$20,000 (O)
Tier 10: 80,001 to 90,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$45,000 (I)/\$22,500 (O)
Tier 11: 90,001 to 100,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$50,000 (I)/\$25,000 (O)
Craft Marijuana Cooperative	Total fees for its Canopy. If more than six locations, add \$200 (I)/\$100(O) per additional location.	Total fees for its Canopy. If more than six locations, add \$1,250(I)/\$625(O) per additional location.
Marijuana Product Manufacturing	\$1,500	\$10,000
Marijuana Microbusiness	\$0	50% of all applicable license fees
Independent Testing Laboratory	\$1,500	\$10,000
Marijuana Retailer (brick and mortar)	\$1,500	\$10,000
Social Consumption Establishment	\$1,500	\$10,000
Marijuana Transporter: Third-party Transporter	\$1,500	\$5,000



Marijuana Transporter: Existing Licensee Transporter	\$1,000	\$5,000
Marijuana Courier	\$1,500	\$5,000
Marijuana Delivery Operator	\$1,500	\$10,000
ME with a Delivery Endorsement	\$500	\$5,000
Marijuana Research Facility	\$300	\$1,000
Marijuana Research Permit	\$1,000	\$1,000

Responding to a Request for Information (RFI)

- What is an RFI?
- How to identify what additional information is being requested



Application & Licensing Process: Cultivation

Purpose: This course will provide a comprehensive overview and breakdown of the cultivation licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). The course will also provide an overview of the difference between the state and local components, and built-in time for group application walk-through.

Learning Objectives: Participants will receive hands-on group application walkthrough to understand the licensing application process and how to successfully apply. They will develop an understanding of the difference between state and local components of the process, and application guidelines specific to their cultivation license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

Regulations to Cover:

- 500.100: Application for Licensing of Marijuana Establishments
- 500.101: Application Requirements
- 500.102: Action on Applications
- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110: Security Requirements for Marijuana Establishments
- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators

Components to Consider:

State vs. Local Approval Process

- What is the difference between the state and local or municipal level components of the approval process?
- Local: real estate, community outreach meeting, Host Community Agreement, plan to comply with local zoning code, ordinance, or bylaws



- State: application of intent, background check, management and operations profile

State Application Process and Requirements

- MassCIP portal
- Application of intent
 - Required individuals and entities
 - Disclosures of In-State and Out-of-State interests
 - Capital resources
 - Bond or Escrow
 - Property identification and interest documentation
 - Host Community Agreement certification
 - Community outreach meeting attestation and documentation
 - Plans to remain compliant with local ordinances
 - Plan to positively impact disproportionately harmed people
 - Proof of residency for microbusinesses and craft marijuana cooperatives
- Background check
 - Background check information
 - Background authorization forms
- Management and operations profile
 - Business information, articles of organization, and Bylaws
 - Certificate of good standing
 - Business Plan, Liability insurance plan, and proposed timeline
 - Summary of operating plans, policies, and procedures
 - Diversity plan
- Additional requirements for Cultivation license type
 - Applicants for licensure as a Marijuana Cultivator shall include an operational plan for the cultivation of marijuana in compliance with 935 CMR 500.120 in its application's Management and Operations Profile section. Please note that cultivation facilities are required to submit more information regarding their energy impact than other license types.

Application Fees and Annual License Fees

- Application fees waived for SEP applicants with 10% ownership, with the exception of Delivery-Only and Social Consumption license types which require SEP participants to maintain majority (51%) ownership.
- Annual license fees reduced by 50%



- The fees for adult-use applications and licenses are as follows:

License Types	Application Fees (Indoor/Outdoor)	Annual License Fee (Indoor/Outdoor)
Marijuana Cultivator (Indoor or Outdoor) Tier 1: up to 5,000 square feet Tier 2: 5,001 to 10,000 sq. ft. Tier 3: 10,001 to 20,000 sq. ft. Tier 4: 20,001 to 30,000 sq. ft. Tier 5: 30,001 to 40,000 sq. ft. Tier 6: 40,001 to 50,000 sq. ft. Tier 7: 50,001 to 60,000 sq. ft. Tier 8: 60,001 to 70,000 sq. ft. Tier 9: 70,001 to 80,000 sq. ft. Tier 10: 80,001 to 90,000 sq. ft. Tier 11: 90,001 to 100,000 sq. ft.	\$200 (I)/\$100 (O) \$400 (I)/\$200 (O) \$600 (I)/\$300 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O) \$2,000 (I)/\$1,500 (O)	\$1,250 (I)/\$625 (O) \$2,500 (I)/\$1,250 (O) \$5,000 (I)/\$2,500 (O) \$20,000 (I)/\$10,000 (O) \$22,500 (I)/\$11,250 (O) \$25,000 (I)/\$12,500 (O) \$30,000 (I)/\$15,000 (O) \$35,000 (I)/\$17,500 (O) \$40,000 (I)/\$20,000 (O) \$45,000 (I)/\$22,500 (O) \$50,000 (I)/\$25,000 (O)
Craft Marijuana Cooperative	Total fees for its Canopy. If more than six locations, add \$200 (I)/\$100(O) per additional location.	Total fees for its Canopy. If more than six locations, add \$1,250(I)/\$625(O) per additional location.
Marijuana Product Manufacturing	\$1,500	\$10,000
Marijuana Microbusiness	\$0	50% of all applicable license fees
Independent Testing Laboratory	\$1,500	\$10,000
Marijuana Retailer (brick and mortar)	\$1,500	\$10,000
Social Consumption Establishment	\$1,500	\$10,000
Marijuana Transporter: Third-party Transporter	\$1,500	\$5,000
Marijuana Transporter: Existing Licensee Transporter	\$1,000	\$5,000



Marijuana Courier	\$1,500	\$5,000
Marijuana Delivery Operator	\$1,500	\$10,000
ME with a Delivery Endorsement	\$500	\$5,000
Marijuana Research Facility	\$300	\$1,000
Marijuana Research Permit	\$1,000	\$1,000

Responding to a Request for Information (RFI)

- What is an RFI?
- How to identify what additional information is being requested

Suitability Standards

- What are suitability standards?
- Where to find suitability tables
- Suitability determination process



Application and Licensing Process: Product Manufacturing

Purpose: This course will provide a comprehensive overview and breakdown of the licensing application process, requirements per 935 CMR 500.101 through 935 CMR 500.104, and general requirements in 935 CMR 500.105(1). The course will also provide an overview of the differences between the state and local components, with built-in time for group application walk-through.

Learning Objectives: Participants will receive hands-on, group and one-on-one application walk-through to understand the licensing application process and how to successfully apply. They will develop an understanding of the differences between state and local components of the process, and application guidelines specific to their product manufacturing or retail license types. Participants will use a Commission-tailored checklist of next steps and required documentation.

Regulations to Cover:

- 500.100: Application for Licensing of Marijuana Establishments
- 500.101: Application Requirements
- 500.102: Action on Applications
- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110: Security Requirements for Marijuana Establishments
- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers
- 500.800: Background Check Suitability Standard for Licensure and Registration
- 500.801: Suitability Standard for Licensure
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:

State vs. Local Approval Process

- What are the differences between the state and local or municipal level components of the approval process?



- Local: real estate, community outreach meeting, host community agreement, plan to comply with local zoning code, ordinance, or bylaws
- State: application of intent, background check, management and operations profile

State Application Process and Requirements

- MassCIP portal
- Application of intent
 - Required individuals and entities
 - Disclosures of In-State and Out-of-State interests
 - Capital resources
 - Bond or escrow
 - Property identification and interest documentation
 - Host Community Agreement certification
 - Community outreach meeting attestation and documentation
 - Plans to remain compliant with local ordinances
 - Plan to positively impact disproportionately harmed people
 - Proof of residency for microbusinesses and craft marijuana cooperatives
- Background check
 - Background check information
 - Background authorization forms
- Management and operations profile
 - Business information, articles of organization, and bylaws
 - Certificate of good standing
 - Business Plan, Liability insurance plan, and proposed timeline
 - Summary of operating plans, policies, and procedures
 - Diversity plan
- Additional requirements for Product Manufacturing license type
 - Applicants for licensure as a Marijuana Product Manufacturer shall include the following information in its Management and Operations Profile:
 - A detailed description of the applicant’s proposed plan for obtaining marijuana from licensed MEs; and
 - A list of all products the applicant plans to produce with the following information:
 - Description of types, forms, shapes, colors, and flavors of products;
 - Methods of production;
 - Safety plan for the manufacturing and production of products in



compliance with 935 CMR 500.130; and

- Sample of any unique identifying mark (product logo) that will appear on the product.

Application Fees and Annual License Fees

- Application fees waived for SEP applicants with 10% ownership, with the exception of Delivery-Only and Social Consumption license types which require SEP participants to maintain majority (51%) ownership.
- Annual license fees reduced by 50%
- The fees for adult-use applications and licenses are as follows:

License Types	Application Fees (Indoor/Outdoor)	Annual License Fee (Indoor/Outdoor)
Marijuana Cultivator (Indoor or Outdoor)		
Tier 1: up to 5,000 square feet	\$200 (I)/\$100 (O)	\$1,250 (I)/\$625 (O)
Tier 2: 5,001 to 10,000 sq. ft.	\$400 (I)/\$200 (O)	\$2,500 (I)/\$1,250 (O)
Tier 3: 10,001 to 20,000 sq. ft.	\$600 (I)/\$300 (O)	\$5,000 (I)/\$2,500 (O)
Tier 4: 20,001 to 30,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$20,000 (I)/\$10,000 (O)
Tier 5: 30,001 to 40,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$22,500 (I)/\$11,250 (O)
Tier 6: 40,001 to 50,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$25,000 (I)/\$12,500 (O)
Tier 7: 50,001 to 60,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$30,000 (I)/\$15,000 (O)
Tier 8: 60,001 to 70,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$35,000 (I)/\$17,500 (O)
Tier 9: 70,001 to 80,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$40,000 (I)/\$20,000 (O)
Tier 10: 80,001 to 90,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$45,000 (I)/\$22,500 (O)
Tier 11: 90,001 to 100,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$50,000 (I)/\$25,000 (O)
Craft Marijuana Cooperative	Total fees for its Canopy. If more than six locations, add \$200 (I)/\$100(O) per additional location.	Total fees for its Canopy. If more than six locations, add \$1,250(I)/\$625(O) per additional location.
Marijuana Product Manufacturing	\$1,500	\$10,000



Marijuana Microbusiness	\$0	50% of all applicable license fees
Independent Testing Laboratory	\$1,500	\$10,000
Marijuana Retailer (brick and mortar)	\$1,500	\$10,000
Social Consumption Establishment	\$1,500	\$10,000
Marijuana Transporter: Third-party Transporter	\$1,500	\$5,000
Marijuana Transporter: Existing Licensee Transporter	\$1,000	\$5,000
Marijuana Courier	\$1,500	\$5,000
Marijuana Delivery Operator	\$1,500	\$10,000
ME with a Delivery Endorsement	\$500	\$5,000
Marijuana Research Facility	\$300	\$1,000
Marijuana Research Permit	\$1,000	\$1,000

Responding to a Request for Information (RFI)

- What is an RFI?
- How to identify what additional information is being requested

Suitability Standards

- What are suitability standards?
- Where to find suitability tables
- Suitability determination process



Application and Licensing Process: Delivery

Purpose: This course will provide a comprehensive overview and breakdown of the application requirements, licensing process, and compliance requirements pursuant to the identified “Regulations to Cover” section below. The course will also provide an overview of the difference between the state and local components, with built-in time for group application walk-through.

Learning Objectives: Participants will receive hands-on, group and one-on-one application walkthrough to not only understand the licensing application process but also, how to successfully apply, the understanding of the difference between state and local components of the process, and application guidelines specific to their delivery license types. Participants will use a Commission- tailored checklist of next steps and required documentation.

Regulations to Cover:

- 500.100: Application for Licensing of Marijuana Establishments
- 500.101: Application Requirements
- 500.102: Action on Applications
- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110: Security Requirements for Marijuana Establishments
- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators

Components to Consider:

State vs. Local Approval Process

- What is the difference between the state and local or municipal level components of the approval process?



- Local: real estate, community outreach meeting, host community agreement, plan to comply with local zoning code, ordinance, or bylaws
- State: application of intent, background check, management, and operations profile

State Application Process and Requirements

- MassCIP portal
- Pre-certification and provisional license applications (Two-Part Process)
- Application of intent
 - Required individuals and entities
 - Disclosures of In-State and Out-of-State interests
 - Capital resources
 - Bond or Escrow
 - Property identification and interest documentation
 - Host Community Agreement certification
 - Community outreach meeting attestation and documentation
 - Plans to remain compliant with local ordinances
 - Plan to positively impact disproportionately harmed people
 - Third-Party Technology Platform Provider disclosure and agreements (all delivery applicants)
 - Marijuana Retailer agreements (Marijuana Courier applicants only)

Background Check

- MassCIP portal
- Pre-certification and provisional license applications (Two-Part Process)
- Application of intent

Management and Operations Profile

- Business information, articles of organization, and Bylaws
- Certificate of good standing
- Business Plan, Liability insurance plan, and proposed timeline
- Summary of operating plans, policies, and procedures
- Diversity plan



Additional Requirements for Marijuana Couriers

- Delivery plan

Additional Requirements for Marijuana Delivery Operators

- Delivery plan
- Plan to obtain marijuana and marijuana products
- Detailed White Labeling Plan

Suitability Standards

- What are suitability standards?
- Where to find suitability tables?
- Suitability determination process

Application Fees and Annual License Fees

- Application fees waived for SEP applicants with >50% ownership
- First annual license fee reduced by 100%
- Renewal Annual license fees reduced by 50%
- The fees for adult-use applications and licenses are as follows:



License Types	Application Fees (Indoor/Outdoor)	Annual License Fee (Indoor/Outdoor)
Marijuana Cultivator (Indoor or Outdoor)		
Tier 1: up to 5,000 square feet	\$200 (I)/\$100 (O)	\$1,250 (I)/\$625 (O)
Tier 2: 5,001 to 10,000 sq. ft.	\$400 (I)/\$200 (O)	\$2,500 (I)/\$1,250 (O)
Tier 3: 10,001 to 20,000 sq. ft.	\$600 (I)/\$300 (O)	\$5,000 (I)/\$2,500 (O)
Tier 4: 20,001 to 30,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$20,000 (I)/\$10,000 (O)
Tier 5: 30,001 to 40,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$22,500 (I)/\$11,250 (O)
Tier 6: 40,001 to 50,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$25,000 (I)/\$12,500 (O)
Tier 7: 50,001 to 60,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$30,000 (I)/\$15,000 (O)
Tier 8: 60,001 to 70,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$35,000 (I)/\$17,500 (O)
Tier 9: 70,001 to 80,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$40,000 (I)/\$20,000 (O)
Tier 10: 80,001 to 90,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$45,000 (I)/\$22,500 (O)
Tier 11: 90,001 to 100,000 sq. ft.	\$2,000 (I)/\$1,500 (O)	\$50,000 (I)/\$25,000 (O)
Craft Marijuana Cooperative	Total fees for its Canopy. If more than six locations, add \$200 (I)/\$100(O) per additional location.	Total fees for its Canopy. If more than six locations, add \$1,250(I)/\$625(O) per additional location.
Marijuana Product Manufacturing	\$1,500	\$10,000
Marijuana Microbusiness	\$0	50% of all applicable license fees
Independent Testing Laboratory	\$1,500	\$10,000
Marijuana Retailer (brick and mortar)	\$1,500	\$10,000
Social Consumption Establishment	\$1,500	\$10,000



Marijuana Transporter: Third-party Transporter	\$1,500	\$5,000
Marijuana Transporter: Existing Licensee Transporter	\$1,000	\$5,000
Marijuana Courier	\$1,500	\$5,000
Marijuana Delivery Operator	\$1,500	\$10,000
ME with a Delivery Endorsement	\$500	\$5,000
Marijuana Research Facility	\$300	\$1,000
Marijuana Research Permit	\$1,000	\$1,000

Responding to a Request for Information (RFI)

- What is an RFI?
- How to identify what additional information is being requested.



Cannabis Business Compliance: Retail

Purpose: This course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Marijuana establishment.

Learning Objectives: Participants will have a clear understanding of general compliance and compliance protocols specific to retail facilities. Participants will develop a general compliance checklist and framework.

Regulations to Cover:

- 500.170: Municipal Requirements / Compliance
- 500.300: Complaints Process
- 500.301: Inspections and Compliance
- 500.302: Compliance Examination
- 500.400 (2): Marijuana Establishment: Grounds for Denial of Initial Application for License
- 500.550: Fines
- 500.040 (d): Compliance Leader: Leadership Rating Program for Marijuana Establishments and Marijuana-related Businesses

Components to Consider:

What is Compliance

- Application compliance
- Operation compliance
- Grounds for denial of an initial application for license
- RFI – Compliance
- Additional compliance application requirements for Retail license type

Municipal Compliance

- Overview of municipal compliance: Bylaws, zoning, and ordinances



- What is municipal compliance?
- Product manufacturing specific municipal compliance requirements

Operational Compliance

- Brief overview of compliance requirements regarding operation
- Brief overview of security
- Fines Compliance Leader
- Proof of identification
- Limitation of sales/Dosing limitations
- Refusal of sales
- Requirements for recording sales
- Packaging and labeling of edible marijuana products compliance (how to read labels)
- Required consumer education
- General compliance testing requirements



Cannabis Business Compliance: Cultivation

Purpose: This course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a cultivation business.

Learning Objectives: Participants will have a clear understanding of general compliance and compliance protocols specific to cultivation facilities. Participants will develop a general compliance checklist and framework.

Regulations to Cover:

- 500.170: Municipal Requirements / Compliance 500.300: Inspections and Compliance
- 500.301: Inspections and Compliance
- 500.302: Compliance Examination
- 500.400 (2): Marijuana Establishment: Grounds for Denial of Initial Application for License
- 500.550: Fines
- 500.040 (d): Compliance Leader: Leadership Rating Program for Marijuana Establishments and Marijuana-related Businesses

Components to Consider:

What is Compliance?

- Application compliance
- Operation compliance
- Grounds for denial of an initial application for license
- RFI – Compliance
- Additional compliance application requirements for Cultivation license type

Municipal Compliance

- Overview of municipal compliance: Bylaws, zoning, and ordinances
- What is municipal compliance?



- Cultivation specific municipal compliance requirements

Operational Compliance

- Brief overview of compliance requirements regarding operation
- Brief overview of security
- Fines Compliance Leader
- Quality control
- Minimum energy efficiency requirements/energy compliance requirements
- HVAC/Dehumidification Systems
- Lighting power densities
- Additional operating policies:
 - Methods for identifying, recording, and reporting diversion, theft, or loss, and for correcting all errors and inaccuracies in inventories.
 - Policies and procedures for handling voluntary and mandatory recalls of marijuana. Such procedures must be adequate to deal with: any action initiated at the request or order of the Commission, any voluntary action by a Marijuana Establishment to remove defective or potentially defective marijuana from the market, as any action undertaken to promote public health and safety.
 - Policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is segregated from other marijuana and destroyed. Such procedures shall provide for written documentation of the disposition of the marijuana.
 - Policies and procedures to reduce energy and water usage, to engage in energy conservation and to mitigate other environmental impacts. The policies and procedures, at a minimum, must be in compliance with 935 CMR 500.105(15) and 935 CMR 500.120(11); and
 - Policies and procedures for the transfer, acquisition, or sale of marijuana between Marijuana Establishments.



Cannabis Business Compliance: Product Manufacturing

Purpose: This course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Marijuana Establishment.

Learning Objectives: Participants will have a clear understanding of general compliance and compliance protocols specific to product manufacturing. Participants will develop a general compliance checklist and framework.

Regulations to Cover:

- 500.170: Municipal Requirements / Compliance
- 500.300: Complaints Process
- 500.301: Inspections and Compliance
- 500.302: Compliance Examination
- 500.400 (2): Marijuana Establishment: Grounds for Denial of Initial Application for License
- 500.550: Fines
- 500.040 (d): Compliance Leader: Leadership Rating Program for Marijuana Establishments and Marijuana-related Businesses

Components to Consider:

What is Compliance

- Application compliance
- Operation compliance
- Grounds for denial of an initial application for license
- RFI – Compliance
- Additional compliance application requirements for Product Manufacturing license type



Municipal Compliance

- Overview of municipal compliance: Bylaws, zoning, and ordinances
- What is municipal compliance?
- Product Manufacturing specific municipal compliance requirements

Operational Compliance

- Brief overview of compliance requirements regarding operation
- Brief overview of security
- Fines Compliance Leader
- Quality Control



Cannabis Business Compliance: Delivery

Purpose: This course will provide a comprehensive overview of compliance and its guidelines regarding all aspects of owning and running a Marijuana Establishment, with emphasis on delivery businesses.

Learning Objectives: Participants will have a clear understanding of general compliance and compliance protocols specific to delivery licenses and facilities. Participants will develop a general compliance checklist and framework.

Regulations to Cover:

- 500.170: Municipal Requirements
- 500.300: Inspections and Compliance
- 500.301: Unannounced Purchase for Purpose of Investigative Testing (Secret Shopper Program)
- 500.302: Complaints Process
- 500.400 (2): Marijuana Establishment: Grounds for Denial of Initial Application for License
- 500.550: Fines
- 500.040 (d): Leadership Rating Program for Marijuana Establishments and Marijuana-related Businesses

Components to Consider:

What is Compliance?

- Application compliance
- Operational compliance
- Grounds for denial of an initial application for license
- Request for Information (RFI) – Compliance
- Additional compliance application requirements for Delivery license type



Municipal Compliance

- Overview of municipal compliance: Bylaws, zoning, and ordinances
- What is municipal compliance?

Operational Compliance

- Brief overview of compliance requirements regarding operation.
- Brief overview of Security
- Fines Compliance Leader
- Proof of identification
- Limitation of sales/dosing limitations
- Refusal of sales
- Requirements for recording sales
- Packaging and labeling of edible marijuana products compliance (how to read labels)
- Required consumer education
- Delivery requirements
- General compliance testing requirements



Facility Design and Location: Retail

Purpose: This course will provide a comprehensive overview and breakdown of cannabis business facility design under the Commission’s regulations and inform participants on how to navigate these requirements. The course will also provide an overview of identifying and securing a location for a retail facility.

Learning Objectives: Participants will grasp cannabis facility design and regulations, and will develop a model design, design checklist, and framework for next steps. Participants will also understand how to identify and secure a location, including the municipal process involved.

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110(1)(3)(4)(5)(6): Security Requirements for Marijuana Establishments
- 500.140: Additional Operational Requirements for Retail Sale

Components to Consider:

General Facility Design Requirements and Regulations

- Water
- Plumbing
- Floors, walls, and ceilings
- Lighting
- Security

Designing Your Facility

- Floor plan or layout of the facility
- Provisional licensure
 - Architectural plans for the building or renovations
- Special design requirements for retail facilities:
 - Security and Alarm Requirements for Marijuana Establishments Operating



Enclosed Areas.

Securing a Location

- State and municipal compliance
- State mandated buffer zones
- Municipal zoning and bylaws
 - Where to begin and who to outreach
- Real estate process and challenges



Facility Design and Location: Cultivation

Purpose: This course will provide a comprehensive overview and breakdown of cannabis business facility design under the Commission’s regulations, and inform participants on how to navigate these requirements. The course will also provide an overview of identifying and securing a location for a cultivation facility.

Learning Objectives: Participants will grasp cannabis facility design and regulations, and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location, including the municipal process involved.

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110(1)(3)(4)(5)(6): Security Requirements for Marijuana Establishments
- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators

Components to Consider:

General Facility Design Requirements and Regulations

- Water
- Plumbing
- Floors, walls, and ceilings
- Lighting
- Security

Designing Your Facility

- Floor plan or layout of the facility
- Provisional licensure
 - Architectural plans for the building or renovations
- Special design requirements for Cultivators:



- Security and Alarm Requirements for Marijuana Establishments Operating in Enclosed Areas.
- Security and Alarm Requirements for Marijuana Establishments Operating Outdoors.

Securing a Location

- State and municipal compliance
- State mandated buffer zones
- Municipal zoning & bylaws
 - Where to begin and who to outreach
- Real estate process and challenges



Facility Design and Location: Product Manufacturing

Purpose: This course will provide a comprehensive overview and breakdown of cannabis business facility design under the Commission’s regulations and inform participants on how to navigate these requirements. The course will also provide an overview of identifying and securing a location for a product manufacturing facility.

Learning Objectives: Participants will grasp cannabis facility design and regulations, and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location, including the municipal process involved.

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110(1)(3)(4)(5)(6): Security Requirements for Marijuana Establishments
- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers

Components to Consider:

General Facility Design Requirements and Regulations

- Water
- Plumbing
- Floors, walls, and ceilings
- Lighting
- Security

Designing Your Facility

- Floor plan or layout of the facility
- Provisional licensure
 - Architectural plans for the building or renovations
- Special design requirements for Product Manufacturing:



- Security and Alarm Requirements for Marijuana Establishments Operating Enclosed Areas.

Securing a Location

- State and municipal compliance
- State mandated buffer zones
- Municipal zoning & bylaws
 - Where to begin and who to outreach
- Real estate process and challenges



Facility Design and Location: Delivery

Purpose: This course will provide a comprehensive overview and breakdown of cannabis business facility design under the Commission’s regulations, and inform participants on how to navigate these requirements. The course will also provide an overview of identifying and securing a location for a product manufacturing facility. Please note that this section will always apply to Marijuana Delivery Operators and will partially apply to Marijuana Couriers depending on their business structure.

Learning Objectives: Participants will grasp cannabis facility design and regulations, and will develop a model design, design checklist, and framework of next steps. Participants will also understand how to identify and secure a location, including the municipal process involved.

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments
- 500.110: Security Requirements for Marijuana Establishments
- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators

Components to Consider:

General Facility Design Requirements and Regulations

- Water
- Plumbing
- Floors, walls, and ceilings
- Lighting
- Security



Designing Your Facility

- Floor plan or layout of the facility
- Provisional licensure
- Architectural plans for the building or renovations
- Special design requirements for retail facilities
- Security and alarm requirements for Marijuana Establishments Operating in Enclosed Areas

Securing a Location

- State and municipal compliance
- State mandated buffer zones
- Municipal zoning and bylaws
 - Where to begin and who to outreach
- Real estate process and challenges



Security and Working with Law Enforcement: Retail

Purpose: This course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. The course will also cover relationship building with law enforcement.

Learning Objectives: Participants will understand all security requirements for retail facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

Regulations to Cover:

- 500.110: Security Requirements for Marijuana Establishments
- 500.140: Additional Operational Requirements for Retail Sale

Components to Consider:

General Security Requirements

- General requirements
- Alternate security provisions
- Buffer zones
- Limited Access Area
- Security and Alarm Requirements for Marijuana Establishments Operating Enclosed Areas
- Security and Alarm Requirements for Marijuana Establishments Operating Outdoors
- Cash Handling and Transportation Requirements
- Security Requirements for Delivery-only Licensee or a Marijuana Establishment with Delivery Endorsement Operations



- Incident reporting
- Security audits
- Additional security requirements specific to Retail facilities

Working with Law Enforcement

- Developing positive relationships
 - Where to start and who to contact
- How involved are law enforcement authorities in Marijuana Establishments?
- Shared information with law enforcement authorities for Marijuana Establishments
 - What needs to be shared and why
 - Why is it necessary
 - Incident reporting



Security and Working with Law Enforcement: Cultivation

Purpose: This course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. The course will also cover relationship building with law enforcement.

Learning Objectives: Participants will understand all security requirements for cultivation facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

Regulations to Cover:

- 500.110: Security Requirements for Marijuana Establishments
- 500.120: Additional Operation requirements for Indoor and Outdoor Marijuana Cultivators

Components to Consider:

General Security Requirements

- General requirements
- Alternate security provisions
- Buffer zones
- Limited Access Area
- Security and alarm requirements for Marijuana Establishments Operating in Enclosed Areas
- Security and alarm requirements for Marijuana Establishments Operating Outdoors
- Cash handling and transportation requirements
- Security requirements for Delivery-only Licensee or a Marijuana Establishment with



Delivery Endorsement Operations

- Incident reporting
- Security audits

Additional Security Requirements for Cultivators

- 500.120 (4): All phases of the cultivation, processing, and packaging of marijuana by a marijuana cultivator shall take place in a designated area that is not visible from a public place without the use of binoculars, aircraft or other optical aids.
- Required policies and procedures related to security

Working with Law Enforcement

- Developing positive relationships
 - Where to start and who to contact
- How involved are law enforcement authorities in Marijuana Establishments?
- Shared information with law enforcement authorities for Marijuana Establishments
 - What needs to be shared and why
 - Why is it necessary
 - Incident reporting



Security and Working with Law Enforcement: Product Manufacturing

Purpose: This course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. The course will also cover relationship building with law enforcement.

Learning Objectives: Participants will understand all security requirements for product manufacturing facilities including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana products at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

Regulations to Cover:

- 500.110: Security Requirements for Marijuana Establishments
- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers

Components to Consider:

General Security Requirements

- General requirements
- Alternate security provisions
- Buffer zones
- Limited Access Areas
- Security and Alarm Requirements for Marijuana Establishments Operating Enclosed Areas
- Security and Alarm Requirements for Marijuana Establishments Operating Outdoors
- Cash Handling and Transportation Requirements
- Security Requirements for Delivery-only Licensee or a Marijuana Establishment with Delivery Endorsement Operations



- Incident reporting
- Security audits
- Additional security requirements specific to Product Manufacturers

Working with Law Enforcement

- Developing positive relationships
 - Where to start and who to contact
- How involved are law enforcement authorities in Marijuana Establishments?
- Shared information with law enforcement authorities for Marijuana Establishments
 - What needs to be shared and why
 - Why is it necessary
 - Incident reporting



Security and Working with Law Enforcement: Delivery

Purpose: This course will provide a comprehensive overview of security requirements per 935 CMR 500.110 and intersections with law enforcement. The course will also dive into relationship building with law enforcement.

Learning Objectives: Participants will understand all security requirements for retail facilities, including buffer zones, limited access areas, incident reporting and security audits. Participants will develop sufficient safety measures to deter and prevent unauthorized entrance into areas containing marijuana, and theft of marijuana at the Marijuana Establishment. Participants will also develop strategies for establishing positive relationships with law enforcement in the municipality in which the Marijuana Establishment is or will be located.

Regulations to Cover:

- 500.110: Security Requirements for Marijuana Establishments
- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators

Components to Consider:

Security Requirements

- General requirements
- Alternate security provisions
- Buffer zones
- Limited Access Area
- Security and Alarm Requirements for Marijuana Establishments
- Cash Handling, Delivery, and Transportation Requirements
- Incident reporting



- Security audits

Working with Law Enforcement

- Developing positive relationships
- Where to start and who to contact
- How involved are law enforcement authorities in Marijuana Establishments?
- Shared information with law enforcement authorities for Marijuana Establishments
- What needs to be shared and why
- Why is it necessary
- Incident reporting



Testing Process: Retail

Purpose: This course will provide a comprehensive overview of laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

Regulations to Cover:

- 500.160: Testing of Marijuana and Marijuana Products
- 500.140: Additional Operational Requirements for Retail Sale
- 500.303: Unannounced Purchase for Purpose of Investigative Testing (Secret Shopper Program)
- 500.301 (7): Inspections and Compliance (Testing for contaminants during an inspection)
- 500.321: Administrative Hold

Components to Consider:

Testing Process

- General timeline for results
- What goes into testing?
 - Cannabinoid profiles
 - Terpenes
 - Contaminant profile
- Testing of environmental media (soils, solid growing media, and water)

General Requirements

- Written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1)
- Maintaining testing records for no less than one year



- Clone testing requirements
- Transportation
- Storage
- Excess marijuana
- Potency variation
- Retesting

Retail Specific Testing Information

- How to read testing labels
- The importance of training Registered Marijuana Establishment Agents how to read and explain testing labels
- If purchasing wholesale, how should testing results impact negotiations?
- Understanding terpene profiles and how testing result numbers may not always indicate the effectiveness of a strain
 - For example: individual endocannabinoid systems interact with different strains differently based on one's biochemistry. If a strain is compatible with your endocannabinoid system, its effects can feel stronger than a high testing strain, even if its testing results indicate a low percentage of THC-A
- Customer education and the importance of understanding the product/testing results when building your customer base



Testing Process: Cultivation

Purpose: This course will provide a comprehensive overview of the laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

Regulations to Cover:

- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators
- 500.160: Testing of Marijuana and Marijuana Products
- 500.303: Unannounced Purchase for Purpose of Investigative Testing (Secret Shopper Program)
- 500.301 (7): Inspections and Compliance (Testing for contaminants during an inspection)
- 500.321: Administrative Hold

Components to Consider:

Testing Process

- General timeline for results
- What goes into testing?
- Cannabinoid profiles
- Terpenes
- Contaminant profile
- Testing of environmental media (soils, solid growing media, and water)

General Requirements

- Written policy for responding to laboratory results that indicate contaminant levels are



above acceptable limits established in the protocols identified in 935 CMR 500.160(1)

Any such policy shall include:

1. notifying the Commission within 72 hours of any laboratory testing results, indicating that the contamination cannot be remediated, and disposing of the Production Batch.
 2. notifying the Commission of any information regarding contamination, as specified by the Commission or immediately upon request by the Commission.
 - a. The notification must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly.
 - b. The notification from the Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
- Maintaining testing records for no less than one year
 - Clone testing requirements
 - Transportation
 - Storage
 - Excess marijuana
 - Potency variation
 - Retesting



Testing Process: Product Manufacturing

Purpose: This course will provide a comprehensive overview of the laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

Regulations to Cover:

- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers
- 500.150 (3 - 4): Edible Marijuana Products (Labeling and packaging requirements and dosing limitations)
- 500.160: Testing of Marijuana and Marijuana Products
- 500.303: Unannounced Purchase for Purpose of Investigative Testing (Secret Shopper Program)
- 500.301 (7): Inspections and Compliance (Testing for contaminants during an inspection)
- 500.321: Administrative Hold

Components to Consider:

Testing Process

- General timeline for results
- What goes into testing?
 - Cannabinoid profiles
 - Terpenes
 - Contaminant profile
- Testing of environmental media (soils, solid growing media, and water)



General Requirements

- Written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1)
Any such policy shall include:
 1. notifying the Commission within 72 hours of any laboratory testing results indicating that the contamination cannot be remediated and disposing of the Production Batch.
 2. notifying the Commission of any information regarding contamination as specified by the Commission or immediately upon request by the Commission.
 - a. The notification must be from both the Marijuana Establishment and the Independent Testing Laboratory, separately and directly.
 - b. The notification from the Marijuana Establishment must describe a proposed plan of action for both the destruction of the contaminated product and the assessment of the source of contamination.
- Maintaining testing records for no less than one year
- Clone testing requirements
- Transportation
- Storage
- Excess marijuana
- Potency variation
- Retesting



Testing Process: Delivery

Purpose: This course will provide a comprehensive overview of the laboratory testing process per 935 CMR 500.160, the investigative testing process per 935 CMR 500.301, and procedures for quality control and testing of product for potential contaminants.

Learning Objectives: Participants will have a clear understanding of the testing process and will develop an operating procedure for quality control and testing of product for potential contaminants. Participants will understand the investigative process or secret shopper program.

Regulations to Cover:

- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators
- 500.160: Testing of Marijuana and Marijuana Products
- 500.303: Unannounced Purchase for Purpose of Investigative Testing (Secret Shopper Program)
- 500.301 (7): Inspections and Compliance (Testing for contaminants during an inspection)
500.321: Administrative Hold

Components to Consider:

Testing Process

- General timeline for results
- What goes into testing?
 - Cannabinoid profiles
 - Terpenes
 - Contaminant profile
- Testing of environmental media (soils, solid growing media, and water)



General Requirements

- Written policy for responding to laboratory results that indicate contaminant levels are above acceptable limits established in the protocols identified in 935 CMR 500.160(1)
- Maintaining testing records for no less than one year
- Transportation
- Storage
- Excess marijuana
- Potency variation
- Retesting

Delivery Specific Testing Information

- How to read testing labels
- The importance of training Registered Marijuana Establishment Agents how to read and explain testing labels
- How testing results impact negotiations when purchasing wholesale
- Understanding terpene profiles and how testing result numbers may not always indicate the effectiveness of a strain
 - For example: individual endocannabinoid systems interact with different strains differently based on one's biochemistry. If a strain is compatible with your endocannabinoid system, its effects can feel stronger than a high testing strain, even if its testing results indicate a low percentage of THC-A
- Customer education and the importance of understanding the product/testing results when building your customer base



Post-Licensure Operations: Retail

Purpose: This course will provide a recap of the Entrepreneur track and a comprehensive overview of buildout requirements and next steps in becoming an operational cannabis business. The course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

Learning Objectives: Participants will develop a checklist and proposed timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

Regulations to Cover:

- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.140: Additional Operational Requirements for Retail Sale
- 500.145: Additional Operational Requirements for Delivery of Marijuana and Marijuana Products to Consumers
- 500.415: Void Marijuana Establishment License
- 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications
- 500.500: Hearings and Appeals of Actions on Licenses
- 500.800: Background Check Suitability Standard for Licensure and Registration
- 500.801: Suitability Standard for Licensure
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:

Licensure and Renewal

- Provisional License



- Timeline
- Record keeping
- Insurance coverage
- Construction and buildout
- Recruitment
- Agent registration and suitability
- Post-provisional licensure inspection
- Final License
 - Timeline
 - METRC onboarding
 - License compliance examinations
 - Conditions
 - Post-final license inspection
- Commence operations
- Expiration and renewal of licensure
- SEP Benefits – 50% reduction on annual renewal fees
- Notification and approval of changes

Operations

- Developing efficient and sustainable Standards of Procedure (SOP)
- Creating a culture of equity and accessibility
 - ADA Accessibility and how to provide employees with reasonable accommodations
 - Ensuring hiring practices remain inclusive and intentional in including individuals disproportionately impacted by the War on Drugs, specifically Black, African-American, Latinx, Indigenous, and people of color.
- Positively impacting host community and communities disproportionately impacted by the War on Drugs and marijuana prohibition

Sustaining Operations and Growing Your Business

- Practices for sustaining business operations
- Investments and growing your business
- Delivery partnership or Delivery-Only Licensure



Post-Licensure Operations: Cultivation

Purpose: This course will provide a recap of the Entrepreneur track of the Social Equity Program, and a comprehensive overview of buildout requirements and next steps in becoming an operational cannabis business. The course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

Learning Objectives: Participants will develop a checklist and proposed timeline for achieving operation, and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings and how to achieve them. They will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

Regulations to Cover:

- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators
- 500.145: Additional Operational Requirements for Delivery of Marijuana and Marijuana Products to Consumers
- 500.415: Void Marijuana Establishment License
- 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications
- 500.500: Hearings and Appeals of Actions on Licenses
- 500.800: Background Check Suitability Standard for Licensure and Registration
- 500.801: Suitability Standard for Licensure
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:



Licensure and Renewal

- Provisional License
 - Timeline
 - Record keeping
 - Insurance coverage
 - Construction & build out
 - Recruitment
 - Agent registration & suitability
 - Post-provisional licensure inspection
- Final License
 - Timeline
 - METRC onboarding
 - License compliance examinations
 - Conditions
 - Post-final license inspection
- Commence operations
- Expiration and renewal of licensure
- SEP Benefits – 50% reduction on annual renewal fees
- Notification and approval of changes

Operations

- Developing efficient and sustainable Standards of Procedure (SOP)
- Creating a culture of equity and accessibility
 - ADA Accessibility and how to provide employees with reasonable accommodations
 - Ensuring hiring practices remain inclusive and intentional in including individuals disproportionately impacted by the War on Drugs, specifically Black, African-American, Latinx, Indigenous, and people of color.
- Positively impacting host community & communities disproportionately impacted by the War on Drugs and marijuana prohibition

Sustaining Operations and Growing Your Business

- Practices for sustaining business operations
 - How to develop SOPs based on ever-evolving industry best practices
- Investments and growing your business
- Delivery partnership or Delivery-Only Licensure



Post-Licensure Operations: Product Manufacturing

Purpose: This course will provide a recap of the Entrepreneur track and a comprehensive overview of the build-out requirements and next steps in becoming an operational cannabis business. The course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

Learning Objectives: Participants will develop a checklist and proposed timeline for achieving operation and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings and how to achieve them, and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

Regulations to Cover:

- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishments
- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers
- 500.145: Additional Operational Requirements for Delivery of Marijuana and Marijuana Products to Consumers
- 500.415: Void Marijuana Establishment License
- 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications
- 500.500: Hearings and Appeals of Actions on Licenses
- 500.800: Background Check Suitability Standard for Licensure and Registration
- 500.801: Suitability Standard for Licensure
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:



Licensure and Renewal

- Provisional License
 - Timeline
 - Record keeping
 - Insurance coverage
 - Construction and build-out
 - Recruitment
 - Agent Registration and suitability
 - Post-Provisional Licensure Inspection
- Final License
 - Timeline
 - METRC onboarding
 - License compliance examinations
 - Conditions
 - Post-Final license inspection
- Commence operations
- Expiration and renewal of licensure
- SEP Benefits – 50% reduction on annual renewal fees
- Notification and Approval of Changes

Operations

- Developing efficient and sustainable Standards of Procedure (SOP)
- Creating a culture of equity and accessibility
 - ADA Accessibility and how to provide employees with reasonable accommodations
 - Ensuring hiring practices remain inclusive and intentional in including individuals disproportionately impacted by the War on Drugs, specifically Black, African-American, Latinx, Indigenous, and people of color
- Positively impacting host community and communities disproportionately impacted by the War on Drugs and marijuana prohibition

Sustaining Operations and Growing Your Business

- Practices for sustaining business operations
 - How to develop SOPs based on ever-evolving industry best practices
- Investments and growing your business
- Delivery partnership or Delivery-Only Licensure



Post-Licensure Operations: Delivery

Purpose: This course will provide a recap of the Entrepreneur track and a comprehensive overview of buildout requirements and next steps in becoming an operational cannabis business. The course will also cover the leadership rating program for Marijuana Establishments and marijuana-related businesses per 935 CMR 500.040.

Learning Objectives: Participants will develop a checklist and proposed timeline for achieving operation, and prepare for facility inspection and compliance per 935 CMR 500.300. Participants will understand leadership ratings, how to achieve them, and will revisit business plans and applications to finalize checklist and next steps lists. Participants will also develop a plan for communication with vendors post-licensure as a method of sustaining operations.

Regulations to Cover:

- 500.103: Licensure and Renewal
- 500.104: Notification and Approval of Changes
- 500.105: General Operational Requirements for Marijuana Establishment
- 500.140: Additional Operational Requirements for Retail Sale
- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators
- 500.415: Void Marijuana Establishment License
- 500.450: Marijuana Establishment License: Grounds for Suspension, Revocation and Denial of Renewal Applications
- 500.500: Hearings and Appeals of Actions on Licenses
- 500.800: Background Check Suitability Standard for Licensure and Registration
- 500.801: Suitability Standard for Licensure
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:



Licensure and Renewal

- Provisional License
 - Timeline
 - Record Keeping
 - Insurance coverage
 - Construction and buildout
 - Recruitment
 - Agent Registration and suitability
 - Post-Provisional Licensure Inspection
- Final License
 - Timeline
 - METRC onboarding
 - License compliance examinations
 - Conditions
 - Post-Final license inspection
- Commence operations
- Expiration and renewal of licensure
- SEP Benefits – 50% reduction on annual renewal fees after first annual license fee payment reduction of 100%
- Notification and Approval of Changes

Operations

- Developing efficient and sustainable Standards of Procedure (SOP)
- Creating a culture of equity and accessibility
 - ADA Accessibility and how to provide employees with reasonable accommodations
 - Ensuring hiring practices remain inclusive and intentional in including individuals disproportionately impacted by the War on Drugs, specifically Black, African-American, Latinx, Indigenous, and people of color.
- Positively impacting host community and communities disproportionately impacted by the War on Drugs and marijuana prohibition.

Sustaining Operations and Growing Your Business

- Practices for sustaining business operations
- Investments and growing your business



- Delivery partnership



Management Opportunities and Business Compliance

Purpose: This course will provide valuable knowledge to participants on how to navigate a managerial career path in the cannabis industry, and instill the tools needed to become successful managers, refining the skills needed to manage and interact with different levels of staff. The course will also offer a high-level overview of some cannabis business compliance that is essential for management personnel who are responsible for maintaining compliance throughout the year.

Learning Objectives: Participants will have a defined understanding of management-level opportunities and compliance as it relates to those positions and cannabis businesses. They will gain the ability to identify and achieve opportunities within the cannabis industry. Throughout this course, participants will:

- Explore Management, and Executive-Level opportunities;
- Discuss the nuances of management in cannabis, as it pertains to different license types;
- Discuss basic strategy for pursuing managerial and executive-level opportunities;
- Review and understand job titles and roles;
- Develop a clearly defined career path (i.e.; retail, product manufacturing, research, or cultivation industries);
- Develop a career planning action plan;
- Identify personal & professional goals;
- Gain an understanding of the diverse nature of career opportunities in cannabis;
- Enhance awareness of cannabis career jobs, descriptions, and roles; and
- Identify where to search for employment opportunities

Regulations to Cover:

- 500.002: Definitions
- 500.030: Registration of Marijuana Establishment Agents
- 500.031: Denial of a Marijuana Establishment Agent Registration Card



- 500.032: Revocation of a Marijuana Establishment Agent Registration Card
- 500.033: Void Registration Cards
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent
- 500.103: Licensure and Renewal

Components to Consider:

Organizational Excellence

- Management & Leadership Tools
- Functions of Management
- Responsibilities & Reporting Structures
- Managerial Levels
 - Operational
 - Mid-Level
 - Upper (C Suite)

Agent Registration and Requirements

- Employment Eligibility
- Application Process
- CORI/Background Screenings & Suitability
- Renewals
- Termination

Workforce Excellence

- Becoming a successful manager
- Interview techniques
- Workforce building skills
- Ethics & Interpersonal skills

Renewal of Licensing for Mid and Executive Level Management

- Renewal Timeframe
- Requirements for the renewal process
- Positive Impact Plan Documentation
- Diversity Plan Documentation



- HCA Records



Introduction to the Cannabis Plant and Entry Opportunities

Purpose: This course provides an introduction to the cannabis plant and how to pursue an entry and re-entry level career pathway within the cannabis industry.

Learning Objectives: Participants will get a sense of entry and re-entry career opportunities. Participants will establish an intentional action plan to obtain entry-level positions within cannabis facilities. Participants will also:

- Identify personal and professional goals
- Understand the diverse career opportunities in the cannabis industry
- Have an overview of job descriptions, roles, and responsibilities
- Identify where to search for employment opportunities
- Learn how to become an attractive candidate
- Develop cover letters and resumes

Regulations to Cover:

- 500.002: Definitions
- 500.030: Registration of Marijuana Establishment Agents
- 500.031: Denial of a Marijuana Establishment Agent Registration Card
- 500.032: Revocation of a Marijuana Establishment Agent Registration Card
- 500.033: Void Registration Cards
- 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent

Components to Consider:

- History of Cannabis Legalization
- Cannabis Industry Terminology
- Opportunities presented by cannabis legalization



Introduction to the Cannabis Plant

- Main Strains
- Parts of the plant
 - Fiber
 - Seeds
 - Cultivars
 - Sex and Anatomy
- Cannabinoids & Terpenes
 - Terpenes
 - THC
 - CBD
 - CBG
 - CBC
 - CBN

Methods of Consumption and Products

- Inhalation - Smoking and Vaping
- Oral - Edibles, tinctures, capsules, oils, beverages
- Sublingual - dissolvable strips, sprays, lozenge, tinctures
- Topical- lotions, salves, bath salts, oils

Entry Types of Positions and Opportunities

- Delivery - Internal staff
- Delivery - Driver
- Security Personnel
- Cultivation - Bud trimmers
- Cultivation - IPM/ Sanitation
- Product Manufacturing - Tech
- Dispensary - Budtenders
- Dispensary - Check-in / Reception
- Packaging specialists
- Administrative Business Assistant
- Receptionist/Scheduler



Agent Registration and Requirements

- Eligibility
- Application
- Process
- Renewals
- Termination

Job Searching

- Interview skills
- Cover letter and resume prep
- Where to look for jobs
- Highlighting transferable skills
- Vetting and choosing your best entry-level opportunity
- Creating your action plan



Skills-Based Training: Retail

Purpose: This course provides a comprehensive overview of retail establishments, regulations, and employment opportunities within the cannabis industry. The course will also offer hands-on guidance and skills-based trainings to secure entry level retail positions.

Learning Objectives: Participants will understand entry level career pathways and receive skills-based training to obtain entry level positions within retail facilities.

Examples of jobs and skills to consider:

- Customer Service/Cashier
- Environmental Services
- Delivery Driver / Transporter, in accordance with 935 CMR 500.105(13)
- Security
- Team Leads/Shift Leads

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments

Components to Consider:

What is a Marijuana Retailer and what can Retailers do?

- Marijuana Retailer means an entity licensed to purchase and transport cannabis or cannabis products from Marijuana Establishments and to transfer this product to Marijuana Establishments and to sell to consumers.
- Unless licensed, retailers are prohibited from offering cannabis or cannabis products for the purposes of on-site social consumption on the premises of a Marijuana Establishment.
- A retailer shall operate all marijuana-related activities solely at the address identified in the license.



- A Marijuana Retailer shall provide a retail location accessible to consumers 21 years of age or older, or, if collocated with an MTC, Registered Qualifying Patients with the Medical Use of Marijuana Program in possession of a Medical Registration Card.

Retail Regulation:

- General licensing requirements for retail establishments
- General compliance
- Industry best practices/standards of procedure (SOPs)
- Inspections and what to expect

Skills-Based Training

- Consider site tours at different retail facilities if available
- How to tailor your current skill set to the skills required for retail positions
- Breakdown of career path options per position
 - For example: Cashier → Cashier Trainer → Training manager → Team/Shift Lead → Assistant Manager → General Manager → Executive Level positions



Skills-Based Training: Cultivation

Purpose: This course will provide a comprehensive overview of cultivation establishments, regulations and employment opportunities in cultivation. The course will also offer hands-on guidance and skills-based trainings for specific job positions.

Learning Objectives: Participants will receive skills-based training to obtain entry-level positions within cultivation facilities. Participants will develop skills to secure positions regardless of cultivation style or canopy size.

Examples of job and skill types may include:

- Trimmer Assistant
- Cultivation Site Worker
- Delivery Driver / Transporter, in accordance with 935 CMR 500.105(13)

Regulations to Cover:

- 500.050 (5)(c): Marijuana Establishments
- 500.050 (2): Marijuana Establishments/Marijuana Cultivator (Indoor or Outdoor)
- 500.101 (3)(a): Application Requirements / Additional Requirements for Cultivators
- 500.103(1)(b): Licensure and Renewal
- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators

Components to Consider:

What is Cultivation, what can Cultivators do?

A Marijuana Cultivator may cultivate, process and package marijuana to transport marijuana to other Marijuana Establishments, but not to consumers.

Types of Cultivation Establishments



- Outdoor
- Indoor

Tiers:

- Marijuana Cultivators shall select a cultivation tier. Cultivation tiers are based on the square footage of Canopy:
 - Tier 1: up to 5,000;
 - Tier 2: 5,001 to 10,000;
 - Tier 3: 10,001 to 20,000;
 - Tier 4: 20,001 to 30,000;
 - Tier 5: 30,001 to 40,000;
 - Tier 6: 40,001 to 50,000;
 - Tier 7: 50,001 to 60,000;
 - Tier 8: 60,001 to 70,000;
 - Tier 9: 70,001 to 80,000;
 - Tier 10: 80,001 to 90,000; or
 - Tier 11: 90,001 to 100,000.
- Tier Expansion: A Marijuana Cultivator may submit an application, in a time and manner determined by the Commission, to change the tier in which it is classified. A Marijuana Cultivator may change tiers to either expand or reduce production. If a Marijuana Cultivator is applying to expand production, it must demonstrate that while cultivating at the top of its production tier, it has sold 85% of its product consistently over the six months preceding the application for expanded production for an indoor cultivator, or during the harvest season prior to the application for expanded production for an outdoor cultivator.
- Tier Relegation: In connection with the license renewal process for Marijuana Cultivators, the Commission will review the records of the Marijuana Cultivator during the six months prior to the application for renewal for an indoor cultivator or during the harvest season prior to the application for renewal for an outdoor cultivator. The Commission may reduce the Licensee's maximum canopy to a lower tier if the Licensee sold less than 70% of what it produced during the six months prior to the application for renewal for an indoor cultivator or during the harvest season prior to the application for renewal for an outdoor cultivator.
 - Tier Factors: When determining whether to allow expansion or relegate a Licensee to a different tier, the Commission may consider factors including, but not limited to: Cultivation and production history, including whether the plants/inventory suffered a catastrophic event during the licensing period;



- Transfer, sales, and excise tax payment history;
- Existing inventory and inventory history;
- Sales contracts; and
- Any other factors relevant to ensuring responsible cultivation, production, and inventory management.

Definitions:

- **Cultivation Batch:** a collection of cannabis plants from the same seed or plant stock that are cultivated and harvested together, and receive an identical propagation and cultivation treatment including, but not limited to: growing media, ambient conditions, watering and light regimes and agricultural or hydroponic inputs. Clones that come from the same plant are one batch. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Cultivation Batch for the purposes of production tracking, product labeling and product recalls.
- **Horticultural Lighting Equipment (HLE):** any lighting equipment (e.g., fixtures, bulbs, ballasts, controls, etc.) that uses energy for the cultivation of plants, at any stage of growth (e.g., germination, cloning/Mother Plants, propagation, vegetation, flowering, and harvest).
- **Horticulture Lighting Square Footage (HLSF):** Another term for canopy
- **Outdoor Cultivation:** the cultivation of mature cannabis without the use of artificial lighting in the canopy area at any point in time. Artificial lighting is permissible only to maintain immature or vegetative Mother Plants.
- **Process or Processing:** to harvest, dry, cure, trim and separate parts of the cannabis or marijuana plant by manual or mechanical means, except it shall not include Manufacture as defined in 935 CMR 500.002: Manufacture.
- **Production Batch:** a batch of finished plant material, cannabis resin, cannabis concentrate, or cannabis-infused product made at the same time, using the same methods, equipment, and ingredients. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Production Batch for the purposes of production tracking, product labeling and product recalls. All Production Batches shall be traceable to one or more Cannabis Cultivation Batches.
- **Propagation:** the reproduction of cannabis or marijuana plants by seeds, cuttings, or grafting.

Regulations

- Overview of regulations sections relevant to Cultivation



- 500.050 (5)(c): Marijuana Establishments
- 500.050 (2): Marijuana Establishments/Marijuana Cultivator (Indoor or Outdoor)
- 500.101 (3)(a): Application Requirements / Additional Requirements for Cultivators
- 500.103(1)(b): Licensure and Renewal
- 500.120: Additional Operational Requirements for Indoor and Outdoor Marijuana Cultivators

Employment Opportunities in Cultivation

- Entry level opportunities
- Cultivation Assistant
- Trimmer
- Design/develop/sell/install - Lighting / cultivating / energy efficient supplies and/or tools

Skills-Based Training

- 101 Proper Sanitation and Good Agricultural Practices
 - “Starting Clean” across all cultivation tasks, and why cleanliness protocols are important
 - Focus on preventative rather than corrective practices, including proper hygiene, sterilization and storage
- 102 Propagation
 - Understanding the process and purpose of sexual (from seed) and asexual (from clone) propagation, and how to maintain a high success rate
 - Includes proper treatment, watering and environmental conditions
- 103 Transplanting Clones and Vegetative Plants
 - Basics of successful transplanting
 - Covers the subsequent vegetative period, including light cycle, watering and ideal environmental conditions
- 104 Plant Monitoring
 - Scouting for common plant abnormalities, identifying their causes, and outlining appropriate general responses
- 105 Pruning
 - Fundamentals of pruning
 - Types of pruning and the stages at which they are applied
 - Includes topping and trellising
- 106 Flowering and Harvesting
 - Changing the light cycle and environment to suit flower production



- Determining when to harvest
- Harvesting with best practices
- Drying and curing
- Storing



Skills-Based Training: Product Manufacturing

Purpose: This course will provide a comprehensive overview of product manufacturing establishments, regulations and employment opportunities. The course will also offer hands-on guidance and skills-based trainings for specific job positions.

Learning Objectives: Participants will develop skills to obtain entry-level positions within product manufacturing facilities.

Examples of job and skill types may include:

- Packaging and Labeling Associate
- Cannabis Culinary Assistant
- Cannabis Chef
- Delivery Driver / Transporter, in accordance with 935 CMR 500.105(13)

Regulations to Cover:

- 500.105: General Operational Requirements for Marijuana Establishments
- 500.130: Additional Operational Requirements for Marijuana Product Manufacturers

Components to Consider:

What is Product Manufacturing?

- A Marijuana Product Manufacturer is an entity licensed to obtain, manufacture, process and package marijuana or marijuana products and to transfer these products to other Marijuana Establishments, but not to consumers.
- What products can be manufactured?
- Different methods of product manufacturing



Definitions

- **Product Batch:** A batch of finished plant material, cannabis resin, cannabis concentrate, or cannabis-infused product made at the same time, using the same methods, equipment and ingredients. The Licensee shall assign and record a unique, sequential alphanumeric identifier to each Production Batch for the purposes of production tracking, product labeling and product recalls. All Production Batches shall be traceable to one or more Cannabis Cultivation Batches.
- **Manufacture:** Compound, blend, extract, infuse or otherwise make or prepare a cannabis or marijuana product.
- **Known Allergen:** Milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, and soybeans, or such other allergen identified by the Commission.
- **Edible Cannabis Products, Edible Marijuana Products, or Edibles:** A cannabis product that is to be consumed by humans by eating or drinking. These products, when created or sold by a Marijuana Establishment or MTC, shall not be considered a food or a drug as defined in M.G.L. c. 94, § 1.
- **Cannabis or Marijuana Products:** Cannabis and its products, unless otherwise indicated. Cannabis products include products that have been manufactured that contain cannabis or an extract from cannabis, including concentrated forms of cannabis and products composed of cannabis and other ingredients that are intended for use or consumption, including edible cannabis products, beverages, topical products, ointments, oils and tinctures. Cannabis or products include Marijuana-infused Products (MIPs) defined in 935 CMR 500.002.
- **Shelf-stable:** Products that can be safely stored at room temperature in a sealed container. Shelf stable does not include "Time/Temperature Controlled for Safety Food" as it is defined in the 2013 Food Code as adopted under 105 CMR 590.001(A).

Skills-Based Training:

- Consider site tours if available
- How to tailor your current skill set to the skills required for product manufacturing positions
- Breakdown of career paths for entry level opportunities
 - For example: Manufacturing technician level I → Manufacturing technician level II → Culinary assistant → Culinary Team/Shift Lead → Head Chef/Culinary Team Manager



Skills-Based Training: Delivery

Purpose: This course will provide a comprehensive overview of retail establishments, regulations, and employment opportunities within the cannabis industry. The course will also offer hands-on guidance and skills-based trainings to secure entry level delivery positions.

Learning Objectives: Participants will understand entry level career pathways and receive skills-based training to obtain entry-level positions within delivery facilities.

Examples of Jobs and Skills to Consider:

- Delivery Driver/Transporter, in accordance with 935 CMR 500.105(13)
- Security
- Team Leads/Shift Leads

Regulations to Cover:

- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.146: Additional Operational Requirements for Marijuana Delivery Operators

Components to Consider:

What is a Marijuana Courier and what can they do?

- A Marijuana Courier is an entity licensed to deliver finished marijuana products, marijuana accessories and branded goods directly to consumers from a Marijuana Retailer, or directly to Registered Qualifying Patients or Caregivers from an MTC, but is not authorized to sell marijuana or marijuana products directly to consumers, Registered Qualifying Patients or Caregivers and is not authorized to wholesale, warehouse, process, repack, or white label/rebrand. 500.050(1)(b).
- Essentially, this licensee can facilitate the orders of consumers 21 years or older (or a patient/caregiver) through a Marijuana Retailer (or MTCs for patients/caregivers) and deliver those orders directly to the consumer, patient, or caregivers' residence.



What is a Marijuana Delivery Operator and what can they do?

- A Marijuana Delivery Operator is an entity licensed to purchase at wholesale and warehouse finished marijuana products acquired from a Marijuana Cultivator, Marijuana Product Manufacturer, Microbusiness or Craft Marijuana Cooperative, and white label/rebrand, sell and deliver finished marijuana products, marijuana accessories and marijuana branded goods directly to consumers, but is not authorized to repackage marijuana or marijuana products or operate a storefront under this license.
- Essentially, this licensee can wholesale marijuana and marijuana products, warehouse them, and sell and deliver to consumers 21 years of age or older.

Delivery Regulation

- General compliance
- Industry best practices/standards of procedure (SOPs)
- Inspections and what to expect

Skills-Based Training

- Consider site-tours at different delivery facilities if available
- How to tailor your current skillset to the skills required for delivery positions
- Breakdown of career path options per position
 - Example: Delivery driver → Training manager → Team/Shift Lead → Assistant Manager → General Manager → Executive Level positions



Skills-Based Training: Testing

Purpose: This course will cover a comprehensive overview of product manufacturing establishments, regulations and employment opportunities in testing. The course will offer hands-on guidance and skills-based training for entry level testing laboratory job positions.

Learning Objectives: Participants will understand product manufacturing establishments, employment opportunities in this field and receive certified skills-based training to obtain entry level positions within testing facilities.

Examples of job types and skills may include:

- Laboratory Assistant
- Laboratory Technician
- Processing Agent
- Lab Manager

Regulations to cover:

- 500.160: Testing of Marijuana and Marijuana Products
- 500.803: Suitability Standard for Registration as a Laboratory Agent

Components to Consider:

What is a testing laboratory and what do they do?

An Independent Testing Laboratory is a laboratory that is licensed or registered by the Commission and is:

- a) currently and validly licensed under 935 CMR 500.101, or formerly and validly registered by the Commission; 935 CMR: CANNABIS CONTROL COMMISSION 11/1/19 935 CMR - 108 500.002: continued
- b) accredited to ISO 17025:2017 or the International Organization for Standardization 17025 by a third-party accrediting body that is a signatory to the International Laboratory Accreditation Cooperation mutual recognition arrangement or that is otherwise approved



by the Commission;

- c) Independent financially from any MTC Marijuana Establishment or Licensee; and
- d) qualified to test Marijuana and Marijuana Products, including MIPs, in compliance with M.G.L. c. 94C, § 34; M.G.L c. 94G, § 15; 935 CMR 500.000; and 935 CMR 501.000: Medical Use of Marijuana; and Commission protocol(s).

Definitions

Cannabinoid - any of several compounds produced by cannabis plants that have medical and psychotropic effects.

Cannabinoid Profile - the amounts, expressed as the dry-weight percentages, of deltaninetetrahydrocannabinol, cannabidiol, tetrahydrocannabinolic acid and cannabidiolic acid in a cannabis or cannabis product.

Mycotoxin - a secondary metabolite of a microfungus that is capable of causing death or illness in humans and other animals. For the purposes of 935 CMR 500.000, mycotoxin shall include aflatoxin B1, aflatoxin B2, aflatoxin G1, aflatoxin G2, and ochratoxin A.

Skills-Based Trainings:

- Consider site tours if available
- How to tailor your current skill set to the skills required for testing laboratory positions
- Breakdown of testing facility career paths:
 - For example: Intake agent → Processing agent → Laboratory Technician
→ Laboratory team/shift lead → Laboratory manager



Resume and Interview Preparation for Cannabis Careers

Purpose: This course will provide a detailed guide for effectively creating or tailoring your resume and preparing for interviews in the cannabis industry.

Learning Objectives: Participants will develop a resume, tailored to the cannabis industry, that showcases their unique value in language specific to the cannabis industry. Participants will understand interview best practices and participate in mock interviews.

Components to Consider:

What are Hiring Managers looking for?

- Key skills Hiring Managers consider when offering a position in the cannabis industry
- Key skills per facility type (retail vs. cultivation vs. transport vs. security, etc.)
- What kind of applicant stands out?
- What experience stands out?
- What language stands out? What industry buzzwords should you use?

Resume Creative, Review, and Tailoring

- How to create a new resume from scratch
- How to adapt a previous resume to fit the job you are pursuing
- How to market your transferable skills
- Using powerful verbiage: Language to include or avoid (For example: “Developed program materials” vs. “Made program materials”)

Securing a Cannabis Industry Interview and Mock Interview

- Preparing for the interview process
- Researching a company and their mission
- Interview questions specific to cannabis



- What questions should an applicant be asking?
- Interview best practices
- Mock interviews

Where to Look for Employment

- Networking
- Social Media

Securing the Job and Agent Registration

- Upward mobility: tips for keeping momentum after starting the job
- Agent registration process and application



Opportunities for Ancillary Businesses

Purpose: This course will provide a comprehensive overview of what ancillary businesses are, how general business principles intersect with the cannabis industry, and opportunities for ancillary businesses.

Learning Objectives: Participants will have a clearly defined understanding of ancillary businesses and opportunities for ancillary business. Participants will identify what type of ancillary business they are looking to pursue.

Components to Consider:

What is an Ancillary Business?

Businesses that support cannabis businesses but are not cannabis (dealing with the plant hands-on) businesses and do not need licensing through the Cannabis Control Commission (CCC).

Examples of Ancillary Businesses and how they interact with the Cannabis Industry:

- Waste Management
- Lawyers
- Accountants
- HVAC Professionals
- Electricians
- Security Installation / Design Professionals
- Consultants – All fields
- Architects
- Real Estate Agents
- Gardening/Cultivation Suppliers
- Renewable/Green Energy Professionals
- Accessory and Tool designers (ashtrays, lighters, vapes, rolling trays, clothes)
- HR Professionals
- Construction/Carpentry
- IT/Web Services



Owning an Ancillary Business

- Guide from the Commonwealth of Massachusetts for Starting a New Business: <https://www.mass.gov/guides/starting-a-new-business>
- Step 1. Choose an Idea
- Step 2. Plan Your Business
- Step 3. Form Your Business - Entity Registration:
 - You must establish a business entity for the ancillary business you intend to operate. Once you have registered your business with the State of Massachusetts, you can then begin the application process to populate fields within the submission. When you first decide to register your entity, you should start thinking about where you want to operate, and start performing market and license research in the local and surrounding communities.
- Step 4. Register for Taxes
- Step 5. Open a Bank Account
- Step 6. Set Up Accounting
- Step 7. Obtain Permits & Licenses
- Step 8. Get Insurance
- Step 9. Define Your Brand
- Step 10. Establish a Web Presence

What Type of Ancillary Business is Right for Me?

- Do you already have a skill set complementary to the cannabis industry?
- Do you already own an ancillary business?



Starting an Ancillary Business and Basic Business Compliance

Purpose: This course will provide a comprehensive overview of starting and operating ancillary businesses as well as general business compliance per Massachusetts state law.

Learning Objectives: Participants will understand the steps to form and register their entities and guidance on how their businesses may be compliant when intersecting with the cannabis industry.

Components to Consider:

How to Start an Ancillary Business

- Build-off of Opportunities for Ancillary Businesses course

What is Compliance?

- General Business Compliance
- Intro to Cannabis Compliance - What does Compliance mean for their business and interaction with Marijuana Establishments.

Municipal Compliance

- Overview of municipal compliance: bylaws, zoning, ordinances.
- What is municipal compliance
- Interacting with Marijuana Establishments - Operational Compliance Per License Type

Compliance Challenges and Remaining Compliant

- Overview of compliance challenges
- Overview of remaining compliant



Universal Business Plan Creation

Purpose: This is an introductory course to business plan creation. This course will provide a breakdown of the sections of a business plan, developing and refining the skills to create a clear, intentional, business plan from start to finish.

Learning Objectives: Participants will learn to recognize and improve tactics to create their entrepreneurial innovation. Participants will create a well-written business plan, which is critical when attracting investors, and an important tool that will give entrepreneurs and small business owners, as well as their employees, the ability to lay out their goals and track their progress.

Regulations to Cover:

- 500.101: Application Requirements

Components to Consider:

- Purpose of a Business Plan
- Market Analyses
- Strategizing growth plan
- Marketing
- Logistics and Operational Plans
- Overall business plan – what is your long-term growth?

Why Do You Need a Business Plan?

- To communicate objectives and benchmarks
- To identify gaps in your strategy
- To transform concept into reality
- To gain an insight into the vitality of your business
- To secure financing and investor motivation
- To reduce risks



Business Plan vs. Financial Models

- Review your Strategic Plan
- Develop financial projections
- Arrange financing
- Plan for contingencies
- Monitor your results vs. your projections

Sections of a Business Plan

- Executive summary
- Market analysis
- Company description
- Company organization
- Marketing and sales
- Financial projections
- Review of business strengths, weaknesses, and opportunities

Creating a Business Plan Toolkit

- Starter Guide
- Workbook
- Strategic planning process
- Defining measures for success
- Securing “buy-in” for business planning
- Implementing the business plan

What You Should Be Looking for in a Business Plan

- Cohesive vision.
 - How the business is organized
 - What does the business offer?
 - Business market description
 - What sets the business aside from the competition?
- Mitigation of risk
 - What is the target market?
 - How big is the business market?
 - Is it growing? How fast?



- Analyzing business competition, strengths, weaknesses



Interacting with Cannabis Establishments for Ancillary Businesses

Purpose: This course will provide ancillary businesses with the framework of what to expect when interacting with cannabis establishments at their facilities and in support of their businesses.

Learning Objectives: Participants will gain foundational knowledge and skills needed to successfully engage professionally within cannabis industry businesses, as ancillary businesses. These knowledge and skills include but are not limited to: basic check-in and security measures for various cannabis establishments, how to conduct financial transactions, how to build and maintain professional business relationships, building brand recognition, and networking. Participants will have a fundamental understanding of general regulations and how to maintain sound business practices to support cannabis licensees or cannabis businesses.

Regulations to Cover:

- 500.002: Definitions
- 500.105 General Operational Requirements for Marijuana Establishments (4)
- 500.110: Security Requirements for Marijuana Establishments
- 500.145: Additional Operational Requirements for Delivery of Marijuana, Marijuana Products, Marijuana Accessories, and Marijuana Establishment Branded Goods to Consumers and as Permitted, to Patients or Caregivers
- 500.150: Edibles

Components to Consider:

Who Needs to Know This?

- Ancillary business owners
- Staff of ancillary businesses
- Third Parties



Security Measures

- Access Areas
- Limited Access Areas
- Check-In Policies and Procedures
- Visitor Identification Badges

Onsite Professionalism and Respect

- Don't take photos
- Don't bring friends
- Not a show and tell
- Do not ask for deals
- Do not bring cannabis, alcohol, or firearms onto the premises

Ancillary Businesses and Regulations

- Marketing and Products
- Labeling
- Pre-approvals from the CCC
- Child-resistant packaging
- Packaging design

Importance of Advertising and Networking

- Web and Social Media Presence
- Events
- Sponsorships
- Power of "word of mouth"



Raising Capital for Ancillary Businesses

Purpose: This course will teach participants how to use their created cost analysis and budget to identify how to raise capital, create fundraising campaigns, and identify and connect with investors. The course will also provide an overview of challenges of raising capital in the industry.

Learning Objectives: Participants will develop a plan to raise capital and have a list of clearly defined fundraising options and investment types. Participants will also learn strategies for developing investor connections.

Components to Consider:

- What is Capital?
- Types of Capital
- What kind of business loans are available to ancillary business and what should be considered before taking on debt?
- Do I Need Capital? How Much Capital Do I Need?
 - Disclosing Capital Amounts (Regulation Sections)
- Accessing capital needed based on budget and cost analysis
- Where to look for investors
- Types of investors
- How to screen/vet potential investors and investor red flags
- Do investors need ownership/equity/control?
- Challenges of raising capital
- Overcoming challenges
- Tools & Resources to connect with investors



Branding, Marketing, and Advertising for Ancillary Businesses

Purpose: This course will provide a comprehensive overview of how to brand, market and advertise a business outside the context of a cannabis business, per Massachusetts law.

Learning Objectives: Participants will have a clear understanding of permitted and prohibited branding, marketing, and advertising requirements. Participants will develop a branding, marketing, and advertising strategy, and a checklist for next steps.

Regulations to Cover:

- 500.105 (4-7): General Operational Requirements for Marijuana Establishments
 - Marketing and Advertising Requirements

Components to Consider:

- What is Branding?
- What is Marketing?
- What is Advertising?
- Are ancillary businesses required to adhere to compliance requirements for marijuana establishments?
 - What components of regulation requirements should be considered?
- How to develop marketing and ad campaigns



Accounting and Taxes for Ancillary Businesses

Purpose: This course provides a comprehensive overview and breakdown of accounting, tax law compliance, and guidelines for businesses generally, and how they may intersect with cannabis businesses, in Massachusetts.

Learning Objectives: Participants will understand tax compliance, practices, violations, projections and documentation associated with owning a business. Participants will understand procedures to ensure accurate recordkeeping, including inventory protocols, in compliance with state law.

Regulations to Cover:

- 500.105 (8-9): General Operational Requirements for Marijuana Establishments
 - Inventory and Transfer
 - Record keeping
 - Identifying how the above intersect with account and taxes for ancillary businesses

Components to Consider:

Accounting

- General financial records and accounting principles, assets and liabilities
- Monetary transactions
- Books of accounts, including journals, ledgers and supporting documents, agreements, checks, invoices, and vouchers
- Sales records

Taxes and Cannabis Taxes

- General Tax documents and principals
- 26 U.S.C. § 280E



- Tax Compliance for Cannabis business/es Violations
- Are ancillary businesses subject to cannabis related tax? Is this something ancillary businesses need to consider?

Inventory and Record Keeping

- General best practices for record keeping
- Are there record keeping regulations for cannabis businesses that ancillary businesses should consider?
- What should be included in business records
- How to maintain and track inventory



Sustaining Operations for Ancillary Businesses

Purpose: This course will provide a comprehensive overview of how to sustain operations, branding, and business goals.

Learning Objectives: Participants will develop a checklist and proposed timeline for achieving operation. Participants will revisit their business plan and finalize checklist and next steps lists.

Components to Consider:

- What should be considered when planning for sustainable long-term operation, including but not limited to:
 - Sustaining employment and employee retention
 - Sustaining profit margins
 - Sustaining business relationships
 - Maintaining efficiency and cost-effective structures
- Common challenges for sustaining operations and ways to problem solve through those challenges
 - Cannabis industry, as well as ancillary, specific challenges Risk assessment and budget changes
- Revisit business plan
 - Adjust goals or metrics as needed
- Develop checklist for next steps
 - What should be considered after operations are functional and efficient?
 - When should you consider growing?

