

**Cannabis Control Board  
Authorized Vendor Trainer Policy  
October 2024**

## Purpose

“[E]ach employee involved in the sale of cannabis or cannabis products to the public” is required by State law to complete “a training program approved by the Board prior to selling cannabis or cannabis products and at least once every 24 months thereafter.” [.7 V.S.A. § 865\(b\)](#). “The training shall include information about the health effects of the use of cannabis and cannabis products.” *Id.*

The CCB has detailed this requirement in rule. CCB staff may approve third-party vendors to administer training programs. It is the responsibility of potential vendors to understand Rule 2.2.5 and to follow this policy document.

### **CCB Rule 2.2.5(b)**

(b) General Employee Training: within 60 days of hire and annually after that, employees of Cannabis Establishments must complete trainings regarding the following topics, except that employees of retail establishments may not sell Cannabis or Cannabis Products to consumers without first completing trainings regarding the first 5 topics of the following list:

- i. the Cannabis Establishment’s operating, security, health, safety, and sanitary procedures;
- ii. compliance, enforcement, inspection, incident reporting, and record-keeping;
- iii. acceptable forms of identification for staff and visitors, if permitted by this rule;
- iv. inventory control and appropriate tracking systems;
- v. cash handling;
- vi. human trafficking and domestic violence awareness;
- vii. diversity, equity, and inclusion;
- viii. racism and bias; and
- ix. sexual harassment and discrimination.

(c) Retail Employee Training: customer-facing employees of retail Cannabis Establishments must complete trainings regarding the following topics, and may not sell Cannabis or Cannabis Products to consumers until they do so:

- i. the health effects of Cannabis and Cannabis Products;
- ii. preventing the sale of Cannabis to minors; and
- iii. signs of overconsumption and signs of mental health or substance abuse disorder.

## Authorized Vendor Trainers – Initial Review

If approved by CCB staff, educators who offer courses that satisfy the Rule 2.2.5(b) requirement may be listed on the CCB website, along with contact information and the end date of their current approval.

Individuals or companies that wish to become authorized vendor trainers should email [CCB.Info@vermont.gov](mailto:CCB.Info@vermont.gov) with the following information:

- Primary contact name, phone number and email address for CCB questions
- Primary contact name and email address for use by interested students
- Website URL
- Educator name, if applicable and if different from primary contact
- Brief overview and/or syllabus of course
- Complete education materials
- Plans and/or metrics for student evaluation
- Course schedule or total hours

Upon submission of the above, the Outreach and Education Manager will initiate a review with the Director of Compliance. Please allow 30 days for staff review.

If course content is consistent with the Cannabis rubric outlined below, the vendor trainer will be listed on the Board's website as approved for a presumptive duration of **two years** from the first approval.

If course content is not consistent with the Cannabis education rubric outlined below, CCB staff may either deny the request for approval or recommend resubmission with recommended changes.

## Nature and Significance of Approval

Requests for course approval do not carry the procedural rights associated with license applications and are not subject to hearings or appeals. Similarly, course approval is not a vested right. The Board may withdraw approval of a vendor trainer or a specific course at any time, for any reason rationally consistent with the public interest or its own operational needs.

# Authorized Vendor Trainers – Random and Scheduled Review

All courses must be available to registration without cost by CCB staff. All vendor trainers will be subject to periodic review by CCB staff upon request. Review may also include unannounced attendance or registration of an online course. Periodic review ensures a course matches the approved initial version and may take place at any point during the approval period.

If a review is requested CCB staff but denied by a training vendor, CCB staff may remove the vendor from the approved list

If a review is conducted and the content is found to be inconsistent with the cannabis education rubric, the course may be removed from the CCB website until the course content is corrected, based on the review by CCB staff. Misrepresentation of course content or repeated deviation from approved curricular content may be cause for permanent ineligibility.

When an approved course approaches its two-year approval anniversary, CCB staff will request a new review, to include all the information listed above for the initial review. Authorized vendor trainers are encouraged to proactively submit their materials as their two-year anniversary approaches to help facilitate re-approval of their course. Like initial approval, re-approval is valid for a presumptive duration of **two years**.

## Cannabis Education Rubric

**To be listed as an authorized vendor trainer, educators must cover the following subjects based on the included reference materials.**

- The Cannabis Establishment’s operating, security, health, safety, and sanitary procedures;
  - Security:
    - CCB Rules [2.4, 2.5, 2.6, 2.8](#)
  - Health and Safety:
    - CCB Rule [2.2.4](#)
  - Sanitary procedures:
    - [Vermont good manufacturing practices](#)
  
- Compliance, enforcement, inspection, incident reporting, and record-keeping;
  - Compliance and enforcement:
    - [CCB Rule 4](#)
  - Inspections:
    - [CCB Rule 2.2.14](#)
  - Records:
    - [CCB Rule 2.2.1](#)

- Acceptable forms of identification for staff and visitors
  - [CCB Rule 1.16: Cannabis Establishment Identification Cards](#)
- Inventory control and appropriate tracking systems;
  - [CCB Rule 2.2.6: Tracking of Cannabis and Cannabis Products](#)
- Cash handling;
  - Covered under Security (CCB Rules [2.4](#), [2.5](#), [2.6](#), [2.8](#))
- Human trafficking and domestic violence awareness;
  - [Vermont Agency of Human Services Domestic Violence Training](#)
- Diversity, equity, and inclusion;
  - [Vermont Office of Racial Equity – Equity Toolkit](#)
- Racism and bias;
  - [Vermont Office of Racial Equity – Equity Toolkit](#)
- Sexual harassment and discrimination.
  - [Sexual Harassment | Workplaces For All \(vermont.gov\)](#)
- Health effects of Cannabis and Cannabis Products;
  - [Cannabis and Adults | Vermont Department of Health \(healthvermont.gov\)](#)
- Preventing the sale of Cannabis to minors
  - [CCB Rule 2.8.3: Age Verification and Customer Personal Information](#)
- Signs of overconsumption and signs of mental health or substance abuse disorder.
  - [Let's Talk Cannabis | Vermont Department of Health \(healthvermont.gov\)](#)

## Consistency with Purpose

The content of vendor training must be consistent with professional educational standards and aligned with the Board’s mission to protect the public while faithfully implementing the intent of the General Assembly to promote a fair, orderly, equitable, and responsible regulated cannabis marketplace. Course content must not be false, misleading, or contrary to the educational purposes of section 865 and related regulations. A vendor trainer shall not advise, counsel, recommend, or encourage trainees to circumvent or undermine State law, including laws and regulations disallowing promotion of overconsumption and disallowing the promotion of cannabis for curative or therapeutic effects. Trainings should encourage trainees to refer customers with medical questions to licensed medical providers.

## Conflicts of Interest

Vendor trainers must not use trainings to promote the commercial or pecuniary interests of themselves or their affiliates, for example, by promoting favored brands. Vendor trainers must disclose to the CCB and to trainees any involvement they, their companies, or their affiliates may have in the cannabis industry, whether as a licensee, an applicant, or a person who intends to become an applicant.

## Complaints Concerning Vendor Trainers

If members of the public or licensees have complaints regarding a vendor trainer, they should send an email to [CCB.Info@vermont.gov](mailto:CCB.Info@vermont.gov) with the following information:

- Name of vendor
- Name of course
- Date course taken
- Location of course (if applicable)
- Role of complainant (were they a student?)
- Specific concerns related to the training materials

## Course Completion

. Vendors should issue a certificate upon successful completion of a training course, including the course title, completion date, vendor name, and student name. Students should keep this certificate and have it readily available for inspection by CCB staff.