



April 22, 2024

To: Craig Prins, Director, Oregon Liquor and Cannabis Commission

From: Oregon Cannabis Commission

Re: Recommendations to OLCC regarding Need to Update Marijuana Handlers' Education Requirements

Director Prins,

Introduction and background:

Cannabis science and consumer behavior evolve rapidly. The Oregon Liquor and Cannabis Commission (OLCC) Marijuana Handlers permitting system fails to keep pace with the depth, breadth, and dynamic nature of this subject matter. Retail employees in particular are inadequately prepared to fulfil their roles based on the OLCC's [requirements and curricula](#), which are insufficient.

The scientific literature shows that after adult-use legalization, registered medical patients leave medical cannabis programs such as the Oregon Medical Marijuana Program (OMMP) in droves. They do not cease using cannabis; rather, they simply purchase cannabis in the adult-use program (Nguyen et al., 2023, *Cannabis and Cannabinoid Research*). Thus, the OLCC is obligated to respond to the reality that the retail workforce directly interfaces with medical cannabis patients. In order to ensure consumer health and safety, education requirements must be updated to reflect this reality.

**The purpose of this document** is to serve as formal guidance in updating the OLCC's education requirements for the cannabis workforce. In addition to expanding the curricula and frequency with which a worker must re-certify, the commission recommends expanding employees' options for meeting the education/certification requirements.

Recommendations:

1. Update rules such that workers are required to re-certify every 3 years. The current regulations (every 5 years) are insufficient to keep pace with the rapidly evolving nature of the field. The OLCC should ensure the educational materials are updated regularly (perhaps with an annual audit) with new information.
2. Expand education requirements for retail employees. While handlers from all aspects of cannabis cultivation would benefit from basic understanding of cannabis' effects in humans (fundamental risks and medical uses), retail employees who regularly interact with

individuals purchasing cannabis for medical purposes would benefit from more in-depth and/or more frequent education. For example, while cultivation and extraction employees may not need to understand potential drug-drug interactions, retail staff confront this issue daily. Enhanced education for retail employees would in turn benefit medical patients and the general public.

3. Expand curriculum to include topics relevant to public health. Retail staff in particular *must* be educated about cannabis' basic pharmacological effects such as dosage, onset, duration, routes of administration, potential contraindications, and what a person should do if they feel too impaired or "high." Topics should also cover health risks such as cannabinoid hyperemesis, warning signs of acute THC overdose, warning signs of THC dependence, the unique health risks of cannabis concentrates, and clear instructions of what retail staff can and cannot discuss with medical cannabis patients.
4. Expand options for employees to receive their certifications and demonstrate proficiency. The subcommittee recommends an alternative pathway: in lieu of taking Marijuana Worker Permit Test after reviewing the OLCC's Worker Permit Education Materials, workers should be able to upload third-party certifications from online training platforms. There are numerous online certification programs which offer high-quality, exhaustive, and up-to-date curricula. The agency could choose one or more of these programs as an accepted vendor. This alternate path could spare the agency the burden of creating and maintaining scientifically accurate curricula for the worker permitting process.
5. OLCC should consider convening a taskforce or Rules Advisory Committee in 2024 to determine the level of education needed for handlers based on what part of the cannabis supply chain the handler's position is involved with (medical patients and the general public, cultivation, processing, warehousing, etc.).

Please reach out to the OCC at [oha.occ@dhsoha.state.or.us](mailto:oha.occ@dhsoha.state.or.us) with any questions or to set up a meeting to discuss next steps to accomplish these recommendations.

Respectfully,

Anthony Taylor, Chair  
Dr. Adie Rae, Vice-chair  
Oregon Cannabis Commission