MINNESOTA
OFFICE OF CANNABIS MANAGEMENT

Certified Medical Cannabis Consultant: Training Program Submission Guidance

The Minnesota Office of Cannabis Management (OCM) is tasked with developing and maintaining the certified medical cannabis consultant (CMCC) program. CMCCs will work to provide medical cannabis consultations to registered medical cannabis patients, as experts on medical cannabis. A cannabis business authorized to sell medical cannabis to registered medical cannabis patients must employ either a pharmacist or a CMCC to have availability for patient consultations. In developing this program, OCM must approve training programs for CMCCs. This document outlines OCM's requirements for CMCC training program curricula, as defined in Minnesota law. OCM is asking organizations to submit CMCC training curricula using this guidance.

Scope

Purpose

The purpose of this guidance is to outline the Office of Cannabis Management (OCM)'s review criteria regarding the approval of training programs for CMCCs. This guidance has been developed in accordance with Minnesota Statutes, chapter 342, and Minnesota Rules, chapter 9810, which permit specially trained CMCCs, in addition to pharmacists, to provide medical cannabis consultations to registered patients.

To ensure equitable access to comprehensive education, all approved training programs must be made available to the public or any individual, regardless of affiliation with an employer. The submission of curriculum for OCM approval is open to anyone who can meet all necessary requirements; it is not limited to licensees or educational institutions.

This training program ensures that all certified consultants possess the comprehensive knowledge and practical skills required to offer safe, effective, and compliant guidance to patients. By empowering these professionals, OCM aims to uphold the highest standards of public health and safety, promote consumer confidence, and ensure equitable access to medical cannabis for all eligible Minnesotans.

Background

In April 2023, Minnesota legalized adult recreational cannabis use with the passage of 2023 House File (HF) 100. This legislation also created the Office of Cannabis Management to regulate both the cannabis and hemp industries. OCM's mission is to build an equitable cannabis industry by focusing on public health and safety, consumer confidence, and market integrity.

In July 2024, the Office of Medical Cannabis (OMC) moved from the Minnesota Department of Health (MDH) to become the Division of Medical Cannabis (DMC) within OCM. By December 2025, OCM will transition from enforcing Minnesota Statutes, chapter 152, and Minnesota Rules, chapter 4770, to enforcing Minnesota Statutes, chapter 342, and Minnesota Rules, chapter 9810, as the existing program's statutory authority sunsets.

As part of this transition, the office is responsible for many tasks, including developing and maintaining the certified medical cannabis consultant program. CMCCs are specialists trained to provide patients with expert, accurate information about medical cannabis. Their role is to fill a critical gap in the medical system, as traditional professional programs often do not cover this topic in depth.

By integrating CMCCs into the medical cannabis market, patient access to reliable advice is expanded. This approach expands the network of qualified professionals beyond the limited number of pharmacists, ensuring more patients receive specialized guidance tailored to their specific needs. Ultimately, the use of CMCCs is intended to enhance patients' access to knowledgeable consultation services.

Statutory references

The following references outline the medical cannabis endorsements for cannabis business licenses, medical cannabis patient consultation, and the requirements for the CMCC curriculum in law.

- Minnesota Statutes, section 342.51, subdivision 1: Endorsement; authorized actions.
- Minnesota Statutes, section 342.51, subdivision 2: Distribution Requirements.
- Minnesota Statutes, section 342.51, subdivision 3: Final approval for distribution of medical cannabis flower and medical cannabinoid products.
- Minnesota Rules, part 9810.2502, subpart 5: Patient Consultation.
- Minnesota Rules, part 9810.4100: Medical Cannabis Consultant Program.

Vision, Goals, and Objectives

Vision

To empower patients with safe, effective, and informed access to medical cannabis, OCM's vision is to provide evidence-based guidance through highly skilled and compassionate certified medical cannabis consultants. OCM aims to ensure optimal therapeutic use and promote public health while operating within the regulatory framework, prioritizing decisions grounded in the latest scientific research and clinical evidence.

Goals of CMCC training program

1. **Ensure patient safety and efficacy:** To guarantee that medical cannabis distributed to patients is approved by qualified personnel, and that patients receive evidence-based guidance on appropriate product use to maximize therapeutic benefits and minimize risks. This ensures that recommendations are grounded in current scientific research, not anecdotal information.
2. **Maintain high standards of consultation:** To establish and uphold rigorous consultation protocols that address patient needs, particularly for new users, those with changing dosages, or novel administration methods, fostering informed patient decisions. These protocols must be built upon evidence-based practice, ensuring that all advice and recommendations are supported by the latest clinical research and best practices in the field.
3. **Develop a robust and compliant training program:** To create and continuously improve OCM-approved training programs that equip certified medical cannabis consultants with comprehensive knowledge and practical skills, meeting all Minnesota regulatory requirements. The curriculum will be rooted in evidence-based practice, covering topics from pharmacology and a variety of delivery methods to patient counseling, all supported by peer-reviewed studies and clinical data.

4. **Promote professionalism and accountability:** To ensure that the training and certification process for CMCCs instills a high degree of professionalism, ethical conduct, and accountability in their practice.

Learning objectives

The certified medical cannabis consultant training program is designed to meet the requirements of Minnesota Rules, part 9810.4100, and related statutes. Upon completion, certified medical cannabis consultants will be able to meet the following requirements.

Patient-centered guidance and advocacy

- **Objective:** Advocate for the patient's best interests by providing unbiased guidance that prioritizes their unique needs and qualifying conditions.
- **Objective:** Adhere to professional ethics by providing guidance that is not tied to a specific brand or manufacturer, ensuring all recommendations are tailored to the patient.
- **Objective:** Practice professional boundaries by avoiding any actions that may suggest diagnosing a medical condition or altering a patient's existing non-cannabis treatment plan.

Adverse event reporting and patient privacy

- **Objective:** Explain the process for reporting adverse events related to medical cannabis use, including identifying what constitutes an adverse event and the required reporting protocols.
- **Objective:** Uphold patient privacy and data security by adhering to all applicable state and federal regulations, including the principles of HIPAA (Health Insurance Portability and Accountability Act), to protect sensitive patient health information.

Medical cannabis selection (Minnesota Rules, part 9810.4100, subpart 3.A):

- **Objective:** Analyze patient-specific information—such as a qualifying condition, symptom profile, and previous cannabis experience—to recommend the most suitable medical cannabis flower, cannabinoid products, and delivery methods.
- **Objective:** Accurately identify and recommend appropriate products available at the dispensary that align with a patient's qualifying medical condition and its associated symptoms.

Risks and benefits (Minnesota Rules, part 9810.4100, subpart 3.B):

- **Objective:** Explain the potential risks and benefits of various medical cannabis flower, cannabinoid products, and associated paraphernalia to facilitate informed patient decision-making.
- **Objective:** Guide patients and caregivers through the pros and cons of different product options.

Pharmacological impacts and drug interactions (Minnesota Rules, part 9810.4100, subpart 3.C):

- **Objective:** Explain the potential pharmacological impacts of cannabis use on the human body, including common side effects and physiological effects.
- **Objective:** Identify common drugs that may interact with cannabis and explain the potential risks.
- **Objective:** Advise patients to consult with their primary healthcare provider regarding potential drug interactions when combining medical cannabis with other medications.

Methods of administration (Minnesota Rules, part 9810.4100, subpart 3.D):

- **Objective:** Differentiate between various methods of administration—such as inhalation, oral, and topical—explaining the onset, duration, and typical effects of each.
- **Objective:** Explain the specific risks and benefits associated with each method of medical cannabis administration.
- **Objective:** Guide patients and caregivers in selecting the most appropriate method of administration based on their qualifying condition, desired effects, and lifestyle.

Safe handling and storage (Minnesota Rules, part 9810.4100, subpart 3.E):

- **Objective:** Instruct patients and caregivers on safe handling and storage practices, including hygiene and maintaining product integrity, such as potency and preventing degradation.
- **Objective:** Educate patients and caregivers on how to prevent minors from accessing medical cannabis products by emphasizing child-resistant packaging and secure storage locations.

Proper use and administration (Minnesota Rules, part 9810.4100, subpart 3.F):

- **Objective:** Provide clear, step-by-step instructions for the proper use and administration of medical cannabis flower and medical cannabinoid products.
- **Objective:** Confidently demonstrate the correct technique for using common medical cannabis paraphernalia and administration devices.
- **Objective:** Troubleshoot common issues related to product administration and use, providing practical solutions and guidance to patients and caregivers.

Safety and prohibited actions (Minnesota Rules, part 9810.4100, subpart 5)

- **Objective:** Identify and avoid prohibited actions, such as diagnosing medical conditions or recommending changes to a patient's existing non-cannabis treatment plan.
- **Objective:** Recognize and decline any form of payment or benefit for recommending specific products, manufacturers, or other entities.
- **Objective:** Enforce rules against providing free samples or allowing on-site consumption of medical cannabis products unless the business has a valid on-site consumption endorsement.

Final approval for medical cannabis distribution (Minnesota Statutes, section 342.51, subdivision 3)

- **Objective:** Identify the specific roles authorized to provide final approval for the distribution of medical cannabis flower and cannabinoid products in Minnesota.
- **Objective:** Explain the four conditions under which a pharmacist or certified medical cannabis consultant must conduct a consultation with a patient before distributing medical cannabis.
- **Objective:** Differentiate between various scenarios that require a consultation, such as a first-time purchase versus a dosage change.
- **Objective:** Identify and perform the essential elements of a patient consultation, including product selection, advising on necessary paraphernalia, and determining appropriate dosage based on chemical compositions like cannabinoid and terpene profiles.
- **Objective:** Explain the permissible methods for conducting remote patient consultations, such as secure video conferences or telephone calls.

- **Objective:** List the critical requirements that must be met for a remote consultation to be considered valid and compliant with state regulations.

Submission Rubric

These rubrics evaluate submissions for CMCC training programs based on the provided purpose, vision, goals, and learning objectives. Submissions are scored on how well they meet the criteria in three categories:

- Does Not Meet
- Partially Meets
- Meets

For a training program to be approved, it must meet all criteria outlined in the rubrics.

Resubmission policy

If a submission's average score is at least 1: Partially Meets across all rubrics, applicants will have an opportunity to revise and resubmit it after OCM review.

If a submission's average score is less than 1: Partially Meets across all rubrics, it will not be approved, and there will be no opportunity to resubmit.

Curriculum content (Based on Minnesota Rules, part 9810.4100, subpart 11A, 11D, & 11F)

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Curriculum plan	No curriculum plan outline is included.	A curriculum outline is provided, but is either incomplete or lacks a detailed breakdown of the time allocated to each topic.	A clear outline of the curriculum plan is included, detailing all training topics and specifying the length of time in hours for each subject. The breakdown is logical and comprehensive.	0-2
Course title and description	The course title is vague or missing, and the description is either absent, too brief, or lacks a clear summary of the course content.	The course title is present, but the description is somewhat unclear or lacks sufficient detail about the course's scope and content.	The course title is precise and reflective of the content, and the description provides a comprehensive and detailed summary of the course's content and purpose.	0-2
Instructor(s) information	No instructor information is provided, or qualifications are entirely absent/ irrelevant.	Instructors are identified, but their qualifications are either incomplete, vague, or do not fully align with the training topics.	The submission clearly identifies all instructors, which topics they will teach, and provides detailed, relevant qualifications for each.	0-2

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Learning objectives	Learning objectives outlined above are absent.	Some of the learning objectives outlined above are missing or are not clearly incorporated in course materials and activities.	The learning objectives outlined above are clearly incorporated in course materials and activities.	0-2
Required materials	The list of required materials is missing, or it only lists some items without full details (e.g., just a book title without the edition or author).	The list of materials is present, but it's incomplete or lacks specific details, such as missing ISBNs for textbooks or names of required software.	All required materials are listed with full and accurate details, including specific textbooks (with authors, titles, and editions), software, and other necessary resources.	0-2
Schedule/ timeline	The schedule is absent or is a jumbled list that doesn't provide a clear, chronological breakdown of the course.	A schedule is provided, but it is incomplete, lacks specific dates, or is not clearly organized by week or session.	The schedule/timeline provides a clear, week-by-week or session-by-session breakdown of topics, readings, and assignments. It is logically organized and easy to follow.	0-2
Assignments and Assessments	A list of assignments is missing, or it does not include due dates or a clear weighting for the final grade.	Assignments are listed, but they lack clear due dates, or the weighting is not specified, making it difficult for students to prioritize their work.	All assignments and assessments are clearly listed with their respective due dates and their weighting in the final grade, providing a transparent view of how grades are earned.	0-2
Grading Policy	The grading policy is missing or is too vague to understand how the final grade is calculated.	The grading policy is present, but it's not fully explained, leaving ambiguity about how specific grades (e.g., pass, fail, incomplete) are determined.	The grading policy is clearly and fully explained, detailing how grades will be calculated and the numerical or percentage ranges for each letter grade.	0-2
Course Policies	Course policies are absent or are limited to a single item, leaving out key information like late work or academic integrity.	Some course policies are listed, but important ones are missing (e.g., no attendance policy), or the policies are not clearly articulated.	A complete set of course policies is provided, including clear rules on late work, attendance, academic integrity, and other relevant regulations, ensuring students understand the expectations.	0-2

Program logistics (Based on Minnesota Rules, part 9810.4100, subpart 11C, 11E, & 11G)

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Location	Missing information about training locations or doesn't specify physical addresses for in-person training.	A general location is mentioned (e.g., "Minneapolis office"), but a specific address is not provided. For virtual training, the platform is mentioned, but its name is not specific (e.g., "a video conferencing app").	Clearly specifies all training locations with precise physical addresses for in-person sessions. For virtual training, the submission clearly identifies the platform used and outlines any required technology for participants.	0-2
Facilities	The submission does not describe the training environment, equipment, or resources.	Provides some, but not all, required information. The description of facilities, equipment, or resources is vague or incomplete.	Provides a detailed description of the training environment, including classroom size, available equipment, and any other resources.	0-2
Delivery Method	The delivery method is not stated, or the submission provides conflicting information. It's unclear whether the training is in-person, virtual, or blended.	The delivery method is stated, but the description is incomplete. For blended programs, the breakdown between in-person and virtual hours is missing or unclear.	Clearly and concisely states the training's delivery method (in-person, virtual, or blended). For blended approaches, the submission includes a specific and accurate breakdown of the hours allocated to each method (e.g., "This program is 20 hours in-person and 10 hours virtual").	0-2
Duration	The curriculum plan outlines a total class time of less than 25 hours, or the class duration appears unrelated to the learning objectives.	The total class time is planned for 25-29 hours, falling just short of the minimum requirement, or the connection between class duration and learning objectives is not clearly demonstrated.	The curriculum plan demonstrates a total class time of at least 30 hours, with a clear and logical connection between the duration and the outlined learning objectives.	0-2

Program personnel (Based on Minnesota Rules, part 9810.4100, subpart 11B)

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Instructor identity and credentials	No information about the instructor's professional or personal identity is provided.	The instructor's identity is mentioned, but key professional information (e.g., job title, organization) is either vague or missing.	The instructor is clearly identified with a specific professional role and relevant affiliations, establishing their credibility and connection to the topic.	0-2
Subject matter expertise	The instructor's qualifications are not included, making it impossible to assess their expertise in the subject.	Qualifications are provided but are either incomplete or do not directly relate to the training topic(s) they will be teaching.	The instructor's qualifications demonstrate a deep understanding of the subject matter. This includes a clear history of professional experience, research, or work that directly applies to the topic(s) being taught.	0-2
Teaching qualifications	No information is provided about the instructor's teaching experience or ability to deliver educational content effectively.	The instructor has qualifications that suggest expertise in the subject, but there is no evidence of their ability to teach it effectively to others. This might include a lack of previous teaching experience or relevant certifications.	The instructor has proven qualifications in both the subject matter and the field of education. This is supported by evidence of previous teaching roles, certifications in instruction, or a track record of delivering engaging and effective training sessions.	0-2

Program administration and evaluation (Based on 9810.4100, Subparts 11H, 11I, & 11J)

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Course & Instructor Evaluation Methods	No methods for evaluating the course or instructors are provided by the program or participants.	Some evaluation methods are mentioned, but they are incomplete, lacking mechanisms for both program and participant feedback.	Comprehensive methods for evaluating both the course and instructors are clearly outlined, including processes for both internal program evaluation and participant feedback.	0-2
Policies for records	No policies or procedures for maintaining records are included.	The submission mentions record keeping but lacks specific policies or procedures, making the process unclear.	The submission outlines specific policies and procedures for maintaining training and testing records, including details on retention, security, and accessibility.	0-2
Sample certificate of completion	No sample certificate of successful completion is provided.	A sample certificate is included but is missing key information or appears unprofessional.	A sample of the training program's certificate of successful completion is included. The sample is professional, includes all necessary information (e.g., participant's name, date of completion, program name), and is well-designed.	0-2

Conflict of interest (COI)

A well-designed conflict of interest (COI) policy isn't a one-size-fits-all solution. The policy should be a direct reflection of your business model. A policy that works for a non-profit organization focused on public education will look different from one for a for-profit company that develops and sells products. Your COI policy must be tailored to the specific risks and relationships inherent in your work, ensuring it effectively safeguards against conflicts while remaining practical for your operations.

Criterion	0: Does Not Meet	1: Partially Meets	2: Meets	Score
Disclosure	The policy does not require instructors, content developers, or planners to disclose potential COIs.	The policy requires some disclosure, but it is vague or incomplete (e.g., only financial interests are mentioned, but not relationships or other non-financial interests).	The policy explicitly requires all individuals involved in the curriculum (instructors, developers, planners) to disclose all potential COIs, including financial interests, relationships, and other relevant affiliations.	0-2
Management & Mitigation	The policy provides no guidance on how to manage or mitigate identified COIs.	The policy acknowledges the need to manage COIs but lacks specific strategies or procedures (e.g., it states COIs should be "addressed" but doesn't explain how).	The policy outlines a clear and specific process for managing and mitigating COIs. This includes strategies such as recusal from decision-making, independent review of materials, disclosure to participants, and modification of content. The policy ensures that no single individual with a COI has final authority over the relevant content.	0-2
Participant Awareness	The policy does not mention informing participants about potential COIs.	The policy mentions disclosing COIs to participants but doesn't specify when or how this disclosure will be made.	The policy mandates that all disclosed COIs are communicated to program participants in a timely and transparent manner, typically at the beginning of the training. It specifies the method of disclosure (e.g., in a handout, a slide, or verbally).	0-2
Policy enforcement & review	There is no mention of policy enforcement or a review process.	The policy is in place but lacks details on who is responsible for enforcing it or how it will be reviewed for effectiveness.	The policy clearly assigns responsibility for its enforcement to a specific individual or committee. It also includes a periodic review process to ensure the policy remains current and effective, and that it addresses new or evolving types of conflicts.	0-2

Appendix A: Statutory References

- Artificially derived cannabinoid - 342.01 subd. 6
- Cannabis concentrate – 342.01 subd. 15
- Cannabis paraphernalia – 342.01 subd. 18
- Caregiver – 9810.0200 subp. 16
- Certified medical cannabis consultant – 9810.0200 subp. 18
- Edible cannabis product – 342.01 subd. 31
- Health care practitioner – 342.01 subd. 32
- Hemp concentrate – 342.01 subd. 35
- Hemp-derived topical product – 342.01 subd. 38
- Intoxicating cannabinoid - 342.01 subd. 46
- Lower-potency hemp edible – 342.01 subd. 50
- Medical cannabis flower - 342.01 subd. 54
- Nonintoxicating cannabinoid - 342.01 subd. 56
- Patient household – 9810.0200 subp. 44
- Patient self-evaluation – 9810.0200 subp. 45
- Pharmacist – 9810.0200 subp. 47
- Registered designated caregiver – 342.01 subd. 64
- Registry verification – 342.01 subd. 66
- Synthetic cannabinoid – 342.01 subd. 69
- THC – 9810.0200 subp. 67
- Total THC – 342.01 subd. 69b
- Visiting patient – 342.01 subd. 71
- Cannabinoid - 342.01 subd. 10
- Cannabinoid extraction – 342.01 subd. 11
- Cannabinoid profile – 342.01 subd. 13
- Certificate holder – 9810.0200 subp. 17
- Child-resistant – 342.01 subd. 24
- Excipient – 9810.0200 subp. 24
- Health record – 342.01 subd. 33
- Hemp-derived consumer product – 342.01 subd. 37
- Ingestible cannabis product – 9810.0200 subp. 30
- Kief – 9810.0200 subp. 33
- Medical cannabinoid - 342.01, subd. 52
- Medical cannabis retailer – 9810.0200 subp. 40
- Patient - 342.01 subd. 59
- Patient registry number – 342.01 subd. 60
- Person subject to guardianship – 9810.0200 subp. 46
- Qualifying medical condition – 342.01 subd. 63
- Registry or registry program – 342.01 subd. 65
- Solvent – 9810.0200 subp. 62
- Terpene profile – 9810.0200 subp. 66
- Tincture – 9810.0200 subp. 68
- Veteran – 342.01 subd. 70
- Volatile solvent – 342.01 subd. 72