



Pre-Licensure Inspection List

***Disclaimer:** The Office of Cannabis Management (OCM) is providing a list of items likely to be inspected as a part of a pre-license inspection. This list may not be exhaustive of all items that the office will be inspecting during a pre-license inspection. OCM is tasked with inspecting the entire premises of a cannabis business and is in no way limited in its authority to inspect any and all parts of a cannabis business. This list is based on requirements in Minnesota Rules (M.R.), chapter 9810, and Minnesota Statutes (M.S.), chapter 342.*

License type: cannabis retailer

Endorsements and activity types available:

- Adult-use cannabis retailer activity**
 - (M.S. § 342.32, subd. 1)
- Medical cannabis retailer endorsement**
 - [M.S. § 342.51, subd. 1(f-g)]

Not all questions will apply; requirements will vary based on what endorsements and activity types you selected in your application.

On-site inspection list

All activities

Facility/property

- **Is the license holder included on the most recent monthly notice by the Minnesota Department of Revenue (DOR) for “Posting of Tax Delinquency”?**
 - (M.S. § 270C.726, subd. 1)
- **How does the license holder ensure they do not make any sales or deliveries to another licensee that is included on the most recent monthly notice by the Minnesota DOR for “Posting of Tax Delinquency”?**
 - (M.S. § 270C.726, subd. 2)

- **Does the building have a certificate of occupancy?**
 - [M.R. P. 9810.1100, subp. 6(B)]
 - **If no, proceed through the next four questions (one of these must be yes to pass).**
 - **Has the municipality waived the requirement?**
 - **Does the applicant have a letter or certification from the municipality that the building does not need a certificate of occupancy?**
 - **Does the applicant have a letter or certification from the municipality or third-party certifier that the building meets all codes?**
 - **Is the building exempt under an “agricultural building” designation?**
- **Is there at least one toilet facility located on the premises in a completely enclosed room with a tight-fitting and self-closing door?**
 - [M.R. P. 9810.1100, subp. 6(A)]
- **Does the product storage area allow regulated products to be stored at least six inches above the ground?**
 - (M.R. P. 9810.1104, subp. 2)
- **Is the product storage area clean, well ventilated, and free from condensation, sewage, dust, dirt, pests, chemicals, and other contaminants?**
 - (M.R. P. 9810.1104, subp. 2)
- **Are there separate areas for storing cannabis flower, hemp plant parts, and cannabis concentrates received from an unlicensed individual vs. a licensed cannabis business?**
 - [M. S. § 342.26, subd. 3(e)]
- **Do hand-washing facilities have a hot and cold water supply?**
 - [M.R. P. 9810.2102, subp. 10(A)(2)(a)]
- **Do hand-washing facilities include soap and paper towels, sanitary towel service, or an electric hand dryer?**
 - [M.R. P. 9810.2102, subp. 10(A)(2)(b-c)]
- **Is there a ventilation and air-handling system that includes humidity and temperature controls that are adequate for safe processing and sanitary operations?**
 - [M.R. P. 9810.2102, subp. 6(A)(3)]
- **Is the facility clean and in sanitary condition, free from infestation by insects, rodents, or other pests?**
 - [M. S. § 342.27, subd. 8(b)]
- **Are all entrances to restricted-access areas marked with conspicuous signage that states “WARNING: RESTRICTED AREA, AUTHORIZED PERSONNEL ONLY”?**
 - [M.R. P. 9810.2501, subp. 3(C)]

Security

- **Is the product storage area locked?**
 - (M.R. P. 9810.1104, subp. 3)
- **Does the product storage area have a posted sign at the entrance stating “Restricted access. Authorized personnel only”?**
 - (M.R. P. 9810.1104, subp. 3)
- **Is security provided at the business premises, including at minimum: alarm system, video surveillance, lighting locks, and an immediate response protocol that must be initiated within 30 minutes after a security event occurs?**
 - [M.R. P. 9810.1500, subp. 1(A)] and [M.R. P. 9810.1500, subp. 2(A)(1-5)]

- **Does the business have effective security measures to guard against product theft?**
 - [M.R. P. 9810.1500, subp. 5(A)]
- **Does the business have effective security measures to guard against product diversion?**
 - [M.R. P. 9810.1500, subp. 5(B)]
- **Does the business have effective security measures to guard against unauthorized access to the premises?**
 - [M.R. P. 9810.1500, subp. 7(A)]
- **Does the business have effective security measures to guard against unauthorized access to electronic business and customer records created and maintained by the business?**
 - [M.R. P. 9810.1500, subp. 7(C)]
- **Does the business have effective security measures to guard against unauthorized access to paper records created and maintained by the business?**
 - [M.R. P. 9810.1500, subp. 7(D)]
- **Is there an alarm system in good working order?**
 - [M.R. P. 9810.1500, subp. 8(A)]
- **Is the alarm system active 24 hours per day, seven days per week?**
 - [M.R. P. 9810.1500, subp. 8(A)]
- **Is the alarm system monitored by a contracted security company or a worker employed by the business?**
 - [M.R. P. 9810.1500, subp. 8(A)]
- **Does the alarm system provide immediate alerts to the business and local law enforcement for any unauthorized breach of the premises or a system failure?**
 - [M.R. P. 9810.1500, subp. 8(A)(1)]
- **Does the alarm system provide immediate alerts to the business and local law enforcement for any hazardous conditions detected on the premises?**
 - [M.R. P. 9810.1500, subp. 8(A)(2)]
- **Does the alarm system have a backup system that activates immediately and automatically upon the loss of electricity, and alerts authorized personnel of the loss of electricity?**
 - [M.R. P. 9810.1500, subp. 8(A)(3)]
- **Does the alarm system have an audible alarm capable of being heard by an individual within a 100-foot radius from entrances and exits?**
 - [M.R. P. 9810.1500, subp. 8(A)(4)]
- **Does the alarm system have the capability to remotely disable the audio alarm by authorized personnel?**
 - [M.R. P. 9810.1500, subp. 8(A)(5)]
- **Is there an operational video surveillance system on the premises?**
 - [M.R. P. 9810.1500, subp. 9(A)]
- **Is the video surveillance system active 24 hours per day, seven days per week?**
 - [M.R. P. 9810.1500, subp. 9(B)]
- **Does the video surveillance system include cameras that are placed in locations to allow clear recording of activity within a radius of at least 20 feet from all points of entry and exit?**
 - [M.R. P. 9810.1500, subp. 9(C)(1)]
- **Does the video surveillance system include cameras affixed to the exterior and interior of the premises to identify individuals entering and exiting the premises, limited-access areas, and restricted-access areas?**
 - [M.R. P. 9810.1500, subp. 9(C)(2)]

- **Does the video surveillance system allow viewing of all areas where cannabis stored, packaged and labeled, prepared for transfer, displayed, sold, or where waste is destroyed or made unusable?**
 - [M.R. P. 9810.1500, subp. 9(D)]
- **Does the video surveillance system produce video files that are stored in a secure place for a minimum of 90 days?**
 - [M.R. P. 9810.1500, subp. 9(E)(1)]
- **Do security cameras record at a minimum of 15 frames per second?**
 - [M.R. P. 9810.1500, subp. 9(E)(2)]
- **Do security cameras have a minimum resolution of 720p?**
 - [M.R. P. 9810.1500, subp. 9(E)(3)]
- **Do security cameras have date and time stamps on all recordings?**
 - [M.R. P. 9810.1500, subp. 9(E)(4)]
- **Do security cameras have the capability to continue recording for an additional eight hours during a power outage?**
 - [M.R. P. 9810.1500, subp. 9(E)(5)]
- **Are all video surveillance recordings saved in an industry standard file format that can be played without the purchase of particular software or equipment?**
 - [M.R. P. 9810.1500, subp. 9(F)(2)]
- **Is there fully functioning lighting in the interior and exterior of the premises?**
 - (M.R. P. 9810.1500, subp. 10)
- **Does lighting permit observers to see and cameras to record any activity in a radius of at least 20 feet around all entrances and exits?**
 - (M.R. P. 9810.1500, subp. 10)
- **Are all external entrances and perimeter windows in good condition?**
 - (M.R. P. 9810.1500, subp. 12)
- **Are all external entrances and perimeter windows lockable with commercial-grade locks?**
 - (M.R. P. 9810.1500, subp. 12)
- **Do all perimeter entry doors have electronic locks and keypads?**
 - (M.R. P. 9810.1500, subp. 12)
- **Does fencing on the premises comply with local laws and requirements?**
 - (M.R. P. 9810.1500, subp. 14)

Employees and personnel

- **Are there any employees under 21 years of age whose scope of work involves the handling of cannabis plants, cannabis flower, artificially derived cannabinoids, or cannabinoid products?**
 - [M.S. § 342.24, subd. 1(a)]

Operational requirements

- **Does it appear that the business will be conducting any licensed activity in a dwelling (home or residence)?**
 - (M.R. P. 9810.1100, subp. 4)
- **Does the business have a scale?**
 - (M.R. P. 9810.1100, subp. 7)

- **Is all equipment for weighing and measuring maintained in a sanitary manner that does not contaminate any products?**
 - (M.R. P. 9810.1100, subp. 7)

Manuals, standard operating procedures (SOPs), and record keeping

- **Does the business have SOPs that include the creation and entry of accurate data in the statewide monitoring system?**
 - [M.R. P. 9810.1100, subp. 2(A)(4)]
- **Does the business have SOPs for the safe and sanitary storage of cannabis plants, cannabis flower, and cannabis products, including maintaining the cleanliness of any building or equipment that the business uses to store or display cannabis plants, cannabis flower, and cannabis products?**
 - [M.R. P. 9810.1100, subp. 2(A)(5)]
- **Does the business have SOPs that include the proper segregation and disposal of a regulated product that is damaged, has a broken seal, has been contaminated, has not been sold by the expiration date on the label, or is the subject of a recall?**
 - [M.R. P. 9810.1100, subp. 2(A)(6)]
- **Does the business have SOPs that include the proper designation of authorized personnel for specified duties of the cannabis business or hemp business and the procedure for issuing necessary worker identification for restricted-access areas?**
 - [M.R. P. 9810.1100, subp. 2(A)(7)]
- **Does the business have SOPs that include the proper designation of authorized personnel who have the authority to access, enter, and update private and nonpublic computer data?**
 - [M.R. P. 9810.1100, subp. 2(A)(8)]
- **Does the business have SOPs that include procedures for responding to a security breach, consistent with Minnesota Statutes, chapters 325E.61 and 325E.64?**
 - [M.R. P. 9810.1100, subp. 2(A)(9)]
- **Does the business ensure that a cannabis worker, hemp worker, or volunteer receives annual training that applies to the role, authority, and responsibilities of the cannabis worker, hemp worker, or volunteer?**
 - [M.R. P. 9810.1102, subp. 2(B)]
- **Does the business have annual worker training, including SOPs required under Minnesota Rules, section 9810.1100, subp. 2(A)?**
 - [M.R. P. 9810.1102, subp. 2(B)(1)]
- **Does the business have annual worker training, including state and applicable federal cannabis laws?**
 - [M.R. P. 9810.1102, subp. 2(B)(2)]
- **Does the business have annual worker training, including state and federal laws regarding data privacy and confidentiality?**
 - [M.R. P. 9810.1102, subp. 2(B)(3)]
- **Does the business have annual worker training, including the proper use of security measures and controls that have been adopted in compliance with Minnesota Rules, part 9810.1500 and Minnesota Statutes, chapter 342?**
 - [M.R. P. 9810.1102, subp. 2(B)(4)]

- **Does the business have annual worker training including procedures on responding to an emergency, including a fire, loss of electrical power, robbery, natural disaster, and workplace violence?**
 - [M.R. P. 9810.1102, subp. 2(B)(5)]
- **Does the business have annual worker training including product recall procedures?**
 - [M.R. P. 9810.1102, subp. 2(B)(6)]
- **Does the business maintain records containing information about each worker who conducts activities authorized by the office, including records that the worker completed necessary training?**
 - [M.R. P. 9810.1102, subp. 2(D)]
- **Is each worker provided with information about procedures for safely handling and operating equipment or tools?**
 - [M.R. P. 9810.1102, subp. 3(D)]
- **Does the business have procedures for storing regulated products in a controlled environment, ensuring that products are free from contamination?**
 - (M.R. P. 9810.1104, subp. 1)
- **Do the business's storage procedures ensure that product storage areas are only used for the storage of regulated products?**
 - [M.R. P. 9810.1104, subp. 1(A)]
- **Are records maintained that describe the date and time of each occasion when a product storage area was accessed, by whom, and the name of individual, and the products that were added or removed from the storage area?**
 - [M.R. P. 9810.1104, subp. 1(B)]
- **Are records maintained for the names and log-in credentials of all Metrc system administrators and system users who have had access within the past 12 months?**
 - (M.R. P. 9810.1301, subp. 8)

If retail:

Medical retail endorsement

If the applicant has a licensed pharmacist or certified medical cannabis consultant, complete one of the following fields.

- **Pharmacist credentials:** license number, license issue date, license expiration date
- **Certified medical cannabis consultants:** certification number, city, county

Minnesota Statutes, section 151.72 registration

- **Are they manufacturing hemp-derived cannabinoid products (HDCPs) under Minnesota Statutes, section 151.72?**
- **Do they have HDCPs for sale under Minnesota Statutes, section 151.72?**
- **Are they wholesaling or warehousing HDCPs under Minnesota Statutes, section 151.72?**
- **Are the products compliant with Minnesota Statutes, chapter 342, and if not, what is the business' plan to either cease sale or update them?**
 - (M.S. § 342.26, subd. 4)

Facility/property

- **Is there a fence or other adequate security measures to separate customer areas from limited-access areas?**
 - (M.R. P. 9810.2501, subps. 1, 3)
- **Is a notice posted stating that operating a motor vehicle under the influence of intoxicating cannabinoids is illegal?**
 - [M.S. § 342.27, subd. 6(2)] and (M.S. § 342.46, subd. 9)
- **Is a notice posted stating that cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products are only intended for consumption by individuals who are at least 21 years of age?**
 - [M.S. § 342.27, subd. 6(3)] and (M.S. § 342.46, subd. 9)
- **Does the facility contain a drive-through window?**
 - [M.S. §342.27, subd. 12(4)]
- **Does the facility contain vending machines for the dispensing of cannabis plants, cannabis flower, cannabis products, lower-potency hemp edibles, or hemp-derived consumer products?**
 - [M.S. § 342.27, subd. 12(5)]
- **Is the retail area kept in a clean and sanitary condition?**
 - (M.R. P. 9810.2500, subp. 2)
- **Does the retail area have ventilation and filtration for odor control as required by state and local law?**
 - [M.R. P. 9810.2500, subp. 2(A)]
- **Does the retail area include a point-of-sale system that is integrated with Metrc?**
 - [M.R. P. 9810.2501, subp. 1(B)]
- **Does each point of ingress into the retail area have conspicuous signage with the statement “No persons under 21 allowed”?**
 - [M.R. P. 9810.2501, subp. 1(C)]

Operational requirements

- **Does the business have procedures for preventing theft of product display samples, treatment of samples as contaminated products, and destruction schedules for samples?**
 - (M.R. P. 9810.2501, subp. 4)
- **Does the business have procedures for how they will handle pre-orders via phone or internet, including age verification, inspection of customer ID at time of sale, accepted forms of payment, and data collection information and security?**
 - (M.R. P. 9810.2501, subp. 5)
- **Does the business have procedures for confirming an individual is enrolled in the patient registry before initiating a sale of medical cannabis?**
 - (M.R. P. 9810.2502, subp. 2)
- **Does the business have procedures for how they will ensure a patient has completed a patient self-evaluation when first purchasing medical cannabis product and every three months thereafter?**
 - (M.R. P. 9810.2502, subps. 3-4)
- **Does the business have procedures for how they will ensure compliance with the requirements for patient consultation and patient-specific labeling for medical cannabis sales?**
 - (M.R. P. 9810.2502, subps. 5-6)

Manuals, SOPs, and record keeping

- **Does the business have an SOP for handling fraudulent identification documents as required under Minnesota Statutes, section 342.27, subd. 4?**
 - (M.R. P. 9810.2500, subp. 3)

Retail operations with deli-style cannabis flower sales (adult-use or medical)

- **Is the business selling cannabis flower deli-style? If no, skip this section.**
- **Does the business follow their SOPs for deli-style cannabis flower sales related to batch storage and display, product tracking and tracing, and flower handling and weighing?**
 - (M.S. § 342.27, subd. 5) (M.R. P. 9810.1100, subp. 7) (M.R. P. 9810.1401, subp. 2)
- **Does the business place each deli-style order into packaging with compliant batch-specific labeling at the final point of sale?**
 - **If yes, is the scale used to weigh flower for deli-style sales calibrated according to the business's SOPs and compliant with the retail requirements of the Minnesota Department of Commerce, Division of Weights and Measures?**
 - (M.R. P. 9810.1100, subp. 7)
- **Does the business properly record deli-style cannabis flower sales in the statewide tracking system according to their SOPs?**
 - (M.R. P. 9810.1300, subp. 2) (M.R. P. 9810.1302, subp. 2)
- **Does the business have safety measures in place that the business will have in place to ensure that deli-style cannabis flower is provided in a safe and sanitary manner?**
 - (M.R. P. 9810.1100, subp. 7) (M.R. P. 9810.2500, subp. 2)