

**STATE OF CALIFORNIA**  
**Budget Change Proposal - Cover Sheet**  
 DF-46 (REV 03/25)

<b>Fiscal Year</b> 2026-27	<b>Business Unit Number</b> 1115	<b>Department</b> Department of Cannabis Control
<b>Hyperion Budget Request Name</b> 1115-021-BCP-2026-GB		<b>Relevant Program or Subprogram</b> 1460010 - Department of Cannabis Control - Support

**Budget Request Title**

Hemp Enforcement and Regulation under Cannabis Framework (AB 8)

**Budget Request Summary**

Chapter 248, Statutes of 2025 (AB 8) restricts the sale of intoxicating hemp products, expands enforcement tools and, beginning in 2028, integrates hemp into the cannabis regulatory framework. The Department of Cannabis Control (DCC) is requesting resources for workload related to implementation of AB 8, including \$5.6 million Cannabis Control Fund and 18.0 positions and \$1.7 million Cannabis Tax Fund and 4.0 positions in 2026-2027; and \$4.1 million Cannabis Control Fund and 18.0 positions and \$852,000 Cannabis Tax Fund and 4.0 positions in 2027-28 and ongoing. DCC expects increased revenue, primarily from licensing fees, to offset costs beginning in 2028-29.

<b>Requires Legislation (submit required legislation with the BCP)</b> <input type="checkbox"/> Trailer Bill Language <input type="checkbox"/> Budget Bill Language <input checked="" type="checkbox"/> N/A	<b>Code Section(s) to be Added/Amended/Repealed</b> N/A
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<b>Does this BCP contain information technology (IT) components?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <i>If yes, departmental Chief Information Officer must sign.</i>	<b>Department CIO</b> Sean O'Connor	<b>Date</b> 1/9/2026
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**For IT requests, specify the project number, the most recent project approval document (FSR, SPR, S1BA, S2AA, S3SD, S4PRA), the approval date, and the total project cost.**

**Project No.** 1115-006

**Approval Date:** TBD

**Project Approval Document:** S1BA

**Total Project Cost:** TBD

**If proposal affects another department, does other department concur with proposal?**  Yes  No

*Attach comments of affected department, signed and dated by the department director or designee.*

<b>Prepared By</b> Christina Dempsey, Deputy Director of Gov. Affairs	<b>Date</b> 1/9/2026	<b>Reviewed By</b> Melissa Eidson, Deputy Director of Administration	<b>Date</b> 1/9/2026
<b>Department Director</b> Clint Kellum	<b>Date</b> 1/9/2026	<b>Agency Secretary</b> Tomiquia Moss	<b>Date</b> 1/9/2026

**Department of Finance Use Only**

**Additional Review:**  Capital Outlay  ITCU  FSCU  OSAE  Dept. of Technology

<b>Principal Program Budget Analyst</b> Charlene Manning	<b>Date submitted to the Legislature</b> 1/9/2026
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## A. Problem Statement

In 2016, California voters approved Proposition 64, the Adult-Use of Marijuana Act, which legalized adult use of cannabis and created a comprehensive regulatory framework for cannabis cultivation, product manufacturing, transportation, testing and sales. In 2017, the Legislature merged this framework with statutes governing medicinal cannabis to create the Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) – a single comprehensive regulatory system for cannabis. State regulation and adult-use sales of cannabis began on January 1, 2018.

The Department of Cannabis Control (DCC) is responsible for regulating all aspects of the commercial cannabis industry, and has the authority to create, issue, deny, renew, discipline, condition, suspend, and revoke licenses for cannabis cultivators, manufacturers, distributors, retailers, microbusinesses, testing laboratories, event organizers, and temporary cannabis events. Cannabis activity conducted without a license is illegal, subject to fines and penalties at both the state and local levels.

In December 2018, the federal government adopted the Agriculture Improvement Act of 2018 ("2018 Farm Bill"). The Farm Bill removed industrial hemp from scheduling under the Controlled Substances Act and created regulatory oversight for hemp farming primarily under the United States Department of Agriculture (USDA).

The Farm Bill requires consumable products containing hemp to comply with the Food, Drug, and Cosmetic Act, which generally prohibits the inclusion of hemp extracts in products. Despite this, product manufacturers across the nation have exploited perceived regulatory gaps to produce and sell intoxicating hemp products. These products are not subject to regulatory control, can contain more tetrahydrocannabinol (THC) than is allowed in legal cannabis markets, and are sold without age restrictions necessary to protect youth.

Cannabis and hemp are varieties of the same plant species, *Cannabis sativa*, and both contain cannabinoids, such as THC, which can be intoxicating. Though the plants are classified differently under federal and state laws, products made from them are nearly identical in composition and their effect on consumers. More than 99 percent of beverages and 70 percent of foods sold by licensed California cannabis retailers would meet the legal definition of hemp (less than 0.3 percent THC), if measured solely by THC content. Because the 0.3 percent THC limit is calculated by total product weight, it is easy for manufacturers to make a beverage, gummy, or edible large enough in size to stay under the legal threshold while still delivering an intoxicating dose of THC. This has allowed products with significant psychoactive effects to be sold as "hemp" even though their potency is similar to regulated cannabis.

In addition, research studies have documented frequent mislabeling and widespread presence of synthetic cannabinoids in the hemp market, raising significant public health and consumer protection concerns. Chapter 576, Statutes of 2021 (AB 45) provided the California Department of Public Health (CDPH) with authority to regulate hemp products manufactured and sold within California. However, CDPH has had insufficient resources to enforce the law, resulting in challenges curbing the proliferation of intoxicating hemp in retail outlets. Following reports of intoxicating hemp products being marketed and sold to children, CDPH in fall 2024 issued emergency regulations to prohibit sales to people under 21 and prohibit THC and other intoxicating cannabinoids in hemp products.

AB 8 provides stronger enforcement tools to address the illegal sale of intoxicating hemp products, including increasing penalties for non-compliance, and expanding DCC's authority and role in enforcement. The law codifies CDPH's emergency regulations banning THC in food, beverages, and dietary supplements, while establishing mechanisms to integrate hemp into the regulated cannabis market.

The law also shifts regulatory and oversight responsibilities for hemp products containing THC from CDPH to DCC. Beginning in 2028, hemp plant material will be allowed to enter the cannabis supply chain; hemp extraction and production of intoxicating hemp products in California will

require a cannabis manufacturing license, and all sales of product to Californians will be limited to licensed cannabis retailers.

This statutory transition places responsibility on DCC to enforce restrictions critical to public health and consumer safety and establish and enforce standards for hemp-derived intoxicating cannabinoids. Without additional resources, DCC will be unable to effectively implement AB 8 and ensure consistent oversight and consumer protections for all intoxicating cannabinoid products.

**Resource History**  
(Dollars in thousands)

<b>Program Budget</b>	<b>2020-21*</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>	<b>2025-26**</b>
Authorized Expenditures	N/A	\$157,765	\$173,623	\$136,387	\$157,440	\$166,127
Actual Expenditures	N/A	\$118,502	\$134,578	\$112,319	\$146,562	\$166,127
Revenues	N/A	\$154,332	\$139,673	\$127,467	\$135,212	\$129,851
Authorized Positions	N/A	622	624	637	649	659
Filled Positions	N/A	388	472	532	556	597
Vacancies	N/A	234	152	105	93	62

\*2020-21 is N/A as the Department was established in 2021.

\*\*Actuals are based on December 2025 estimates

**B. Justification**

DCC has supported CDPH's oversight of hemp products with scientific and policy expertise and law enforcement capacity, starting with the adoption of AB 45 and through the current implementation of their emergency regulations. This workload has been provided on a very limited and ad hoc basis, absorbed by existing staff in addition to their regular duties.

Integrating industrial hemp into the existing cannabis licensing and enforcement framework represents significant, new statutory responsibility. DCC has no dedicated resources and limited workload history specific to industrial hemp product regulation and enforcement and cannot absorb the workload created by AB 8.

AB 8 – and its protections for youth and consumers – cannot be implemented effectively without additional resources. New resources are necessary to:

- Lead enforcement against illegal sales of hemp, including through online sales;
- Implement statewide standards to produce hemp-derived cannabinoid products, including restrictions on the use of THC derived from hemp in inhaled products and requirements for products being transported outside of the state;
- Develop scientific expertise to identify and prevent the inclusion of synthetic cannabinoids in products containing hemp and hemp derivatives;
- Expand inspection capacity and implement robust oversight of the entry of hemp plant material into the supply chain and exit of finished hemp products from the supply chain necessary to maintain integrity within the regulatory framework;
- Conduct policy development, develop regulations and monitor changes in federal law and market dynamics that necessitate changes to regulations and policy approach; and

- Update technology systems, including licensing and the track-and-trace system.

Beginning in 2028, DCC anticipates ongoing expenditures to be offset by new revenues, including from fees for hemp license endorsements issued to cannabis distributors that move hemp into or out of the cannabis supply chain, new licenses issued to businesses that produce hemp products, and from the application of the cannabis excise tax to hemp-derived cannabinoid products.

## **Enforcement Against Illicit Production and Sales**

### **Civil and Online Sales Enforcement (Legal Affairs Division)**

#### **1.0 Attorney IV**

#### **3.0 Special Investigators**

Workload Justification (Attachments 1-2)

The CDPH emergency regulations make it illegal to make or sell intoxicating hemp products within California. However, statutory ambiguity and a lack of resources have made it challenging to enforce against online sales of intoxicating hemp products into California by manufacturers located out of state. AB 8 removes that ambiguity and provides DCC with authority to pursue violations using civil or criminal enforcement.

Illegal sales of hemp products have created a public health risk, particularly for children. Adolescents are four to seven times more likely than adults to develop cannabis use disorders. Online sales bypass regulatory requirements that prevent youth access and protect consumers. Dedicated resources to enforce the law are necessary to stop these behaviors and prevent future wrongdoing.

The requested positions would provide resources needed to establish a Civil Enforcement Unit to conduct investigations of illegal online sales of intoxicating hemp and pursue civil penalties against those violating the law. The Attorney would lead strategy and lawsuits; direct investigations; and draft administrative subpoenas, search warrants and other legal documents. The three Special Investigators would conduct complex investigations, collect evidence, review and triage complaints, draft investigative reports and provide testimony at hearings.

The requested Attorney IV position is needed to handle the complexity that this first-of-its-kind work entails with little to no supervision. This attorney will be responsible for building and establishing the civil enforcement program, including methodology and templates; providing expert legal guidance; and preparing and conducting training for programmatic and junior-level legal staff on legal and enforcement issues. Additionally, this attorney will guide litigation, in conjunction with the Attorney General's Office, including developing pleadings and briefs, discovery strategies, and managing cases in trial and appellate courts.

The online marketplace for illegal hemp products sold directly to consumers in California is sizable, but the state has taken limited enforcement action without resources available and dedicated to this work. With dedicated resources, DCC will be able to conduct swift, robust investigations into online hemp sellers violating AB 8.

Utilizing this classification of attorney, DCC anticipates leading comprehensive investigations of AB 8 violators within six months of hire. We expect those investigations will lead to immediate enforcement action, while others will require further investigation, coordination, and action.

## **Hemp Field Testing Equipment (Enforcement Division)**

### **2.0 Orange Photonics Light Lab Analytical Instrumentation (\$42,000 one-time purchase cost plus \$4,000 in annual maintenance and supplies in 2027-28 and ongoing)**

Industrial hemp and cannabis are varieties of the same plant species, *Cannabis sativa*, and both contain cannabinoids, such as THC, which can be intoxicating. Industrial hemp plants are legal under federal law if they contain less than 0.3 percent THC but are classified as "cannabis" and

illegal under federal law if they contain more THC. Cannabis plants are illegal under federal law but legal under state law if they are grown by a licensed cannabis cultivator. These botanical similarities and legal differences have been exploited by those growing plants purporting to be “hemp” that contain more than 0.3 percent THC (“hot hemp”) or are illegal cannabis.

DCC’s Enforcement Division often encounters operators who try to claim their plants or products are hemp when they are actually cannabis. In July 2025, DCC and other law enforcement agencies discovered and shut down an operator that claimed to be processing hemp; instead, the site contained more than 48,000 pounds of illegal marijuana valued at approximately \$60 million.

Distinguishing between hemp and cannabis based solely on visual characteristics is extremely difficult. The only reliable method to confirm that plants or products labeled as hemp are indeed hemp is through testing. This distinction matters because the legal codes – including those that dictate penalties, seizure, and the quantities that must be reserved and stored for evidence – vary between cannabis and hemp for criminal penalties.

The Light Lab equipment requested is a portable testing device for field testing of cannabinoids found in cannabis and hemp plants, concentrates, and food products. The equipment can test for multiple types of THC that may be found in these goods. The two machines would be used by DCC law enforcement officers to distinguish industrial hemp from illegal cannabis and support robust enforcement against illegal cultivation. Testing on site ensures that illegal products can be seized or destroyed on site, once identified, thereby intercepting product before it can be diverted.

DCC currently has four Light Lab machines. The equipment’s small size and portability is designed to support its routine deployment into the field. The addition of two instruments will ensure each of the Enforcement Division’s field offices has a machine on hand for hemp operations.

## **Oversight of Hemp Products and Integration in Cannabis Supply Chain**

### **Targeted Inspection Capacity (Compliance Division)**

#### **1.0 Senior Environmental Scientist (Supervisory)**

#### **1.0 Senior Environmental Scientist (Specialist)**

#### **6.0 Environmental Scientists**

#### **1.0 Scientific Aid**

Workload Justification (Attachments 3-6)

Hemp has not previously been allowed within the cannabis supply chain or in cannabis products, and its introduction into the supply chain creates new regulatory risk. The cannabis market is a tightly controlled, closed supply chain. Every business that grows, handles or sells cannabis is licensed and inspected by the state. Each of those businesses report real-time inventory and movement of cannabis through a statewide tracking system.

By contrast, hemp plants are not grown by cultivators licensed by DCC and are not tracked using the track-and-trace system. Hemp plant material will be allowed to enter the cannabis supply chain. Finished hemp products that do not contain cannabis will be allowed to exit the cannabis supply chain for sale outside of the state. Both of these events will end the previously closed nature of the supply chain.

Allowing hemp plant material into the cannabis supply chain increases risk of inversion (import of illegal cannabis into the regulated market); allowing hemp products to exit increases risk of diversion (illegal movement of cannabis out of the regulated market). It also creates a potential new incentive for manufacturers to chemically convert non-intoxicating cannabinoids from hemp into intoxicating cannabinoids – a practice that would undermine legitimate cannabis businesses and harm consumers.

Regulatory controls will be implemented to mitigate some of this risk, but DCC must also provide increased oversight of high-risk touch points to ensure compliance and protect the integrity of the regulated market. The nine requested staff will form a multi-disciplinary team responsible for mitigating these risks by monitoring distribution sites where hemp plants will enter the supply chain and finished hemp products will exit the state, as well as manufacturing sites to prevent the production of synthetic cannabinoids. The Senior Environmental Scientist (Supervisor) will direct and evaluate the team, assign inspection and investigatory work, and review reports. They will supervise:

- Six Environmental Scientists responsible for conducting inspections, documenting violations and providing enforcement support;
- One Senior Environmental Scientist (Specialist) responsible for developing inspection protocols and training, researching hemp and synthetic cannabinoids, and liaising with stakeholders;
- One Scientific Aid responsible for collecting samples of suspected synthetic cannabinoid products, performing data entry and supporting inspectors.

Licensed distribution premises will serve as the entry and exit points for hemp in the supply chain. Once hemp plant material enters these licensed premises, it will be tagged and recorded in the track-and-trace system. The material will then be quarantined and tested to ensure it complies with legal limits established for THC content. The requested staff will monitor compliance with these requirements through proactive inspections, engagement with licensees, and oversight of track-and-trace data. Hemp that fails testing must be destroyed, and the requested staff will also communicate with distributors possessing failed batches to ensure destruction occurs as required.

Manufacturers receiving hemp plant material are allowed to extract and process it for use in products. However, they are prohibited from using chemical catalysts and other means to convert extracted CBD into intoxicating chemical compounds. The requested staff will monitor cannabinoid content reported in the testing of finished products for the presence of novel cannabinoids that are not commonly found in nature, as well as unusually high levels of THC in hemp products, which may indicate the presence of synthetic cannabinoids.

Together, these staff will monitor distribution and manufacturing sites, maintaining market integrity and product safety. Without this additional oversight, the integrity of the regulated market could be seriously undermined.

### **Track-and-Trace Program Updates (Compliance and Information Technology Services Divisions)**

#### **Metric System Updates (\$800,000 one-time cost)**

The California cannabis track-and-trace system is currently configured as a closed system, with no outside plants or products containing cannabinoids allowed in or out. Implementing AB 8 will require system modifications to allow industrial hemp plants to be tagged and recorded upon entry and to record the exit of products containing only hemp. These modifications would be one-time system updates to align system functionality with the requirements of the law.

The system is provided by a third-party contractor, Metric. Based on analysis of previous system enhancements and feedback directly from Metric, DCC has identified \$800,000 in costs to support Metric's work to perform business analysis, software development, and testing. The Metric system is a proprietary software product. Departmental staff do not have the capability to access and update software source code to perform the system enhancements; Metric must make the system updates.

The system is currently designed as a closed system that tracks cannabis from "seed to sale." To implement AB 8, the system must be reconfigured to allow cannabinoid plant material (hemp) to be entered into the system from an unlicensed source and allow finished products to exit the system from a non-retail system user.

The changes required to the system are significant, and that fact has a direct relationship to the requested level of funding. If DCC were not able to implement the requirements in the bill in its track-and-trace database, bad actors could exploit loopholes to avoid compliance with statute, undermining the legal market.

## **1.0 Analyst II**

Workload Justification (Attachment 7)

DCC uses the track-and-trace system as a tool to verify compliance with MAUCRSA. The system is used to track cannabis and cannabis products within the supply chain. Licensees input information about inventory, production and transformations of product and transport throughout the state into the system. DCC staff monitor licensee activity, generate reports summarizing data inputs and unusual activity, and conduct analysis to identify anomalies and possible non-compliance.

Data monitoring and reporting workload is expected to increase with the implementation of AB 8, as system functionality is created to record hemp plants and finished product and test results for hemp plant material. The system modifications required to implement AB 8 will change the nature of the system's monitoring and reporting functionality and require additional monitoring for data irregularities.

The requested Analyst II would be responsible for supporting the development of new track-and-trace system functionality, anomaly detection mechanisms and reports to monitor hemp movement in and out of the supply chain. The analyst will evaluate and improve processes necessary to assist in integrating hemp into the supply chain, monitor compliance trends for businesses handling hemp and for newly licensed hemp businesses, coordinate and process data requests related to hemp integration, and prepare reports to assist with regulatory implementation.

After 2028, when system functionality is live and hemp is integrated within the supply chain, the analyst's responsibilities would be expanded to include reviewing licensee activity within the system to ensure proper recording of hemp inventory, transfers, testing results and potential destruction of failed batches. They will conduct data analysis to identify diversion and inversion risks.

The duties of this position are operational and policy-driven in nature, involving coordination with program staff, drafting of departmental procedures, and assistance with the interpretation and implementation of new regulations.

## **New Testing Requirements and Synthetic Cannabinoid Testing Capacity (Compliance Division)**

**1.0 Research Scientist III** (Chemical Science)

**1.0 Research Scientist V** (Chemical Science)

Workload Justification (Attachments 8-9)

The primary cannabinoid present in hemp plants is cannabidiol (CBD). CBD is non-intoxicating and generally has low harm potential, but it can be used as a precursor to create synthetic cannabinoids. Synthetic cannabinoids are chemically engineered compounds that are sometimes included in hemp products to increase intoxicating effect or duration. Like other synthetic drugs, synthetic cannabinoids can be dangerous if not produced in a highly controlled environment.

Integration of hemp into the cannabis supply chain will expand the supply of CBD available for product manufacturing. However, the integration also creates a significant new opportunity for manufacturers to convert CBD into intoxicating synthetic cannabinoids. This practice undermines legitimate cannabis businesses and poses health risks to consumers.

To implement AB 8, DCC will need to develop additional testing methodology to screen for synthetic cannabinoids. Developing testing methodology requires extensive research and experimentation to ensure the resulting methodology is accurate, reliable and repeatable and meets ISO 17025 standards, an international standard that specifies the general requirements for the competence, impartiality, and consistent operation of testing. This process requires identifying compounds and conditions that the test must measure, researching existing test methods used by other laboratories, running early feasibility studies, measuring performance, adjusting instrumentation conditions, and rigorously validating defined procedures. Every step relies on evidence collected during previous steps and proving, rather than assuming, that the testing method works correctly every time.

Monitoring for synthetic cannabinoids will be challenging because each new synthesis pathway produces different byproducts, which changes the required chemical detection and necessitates ongoing method validation. Unlike testing for naturally occurring cannabinoids, laboratories must detect the chemical byproducts created during the synthesis process rather than the cannabinoids themselves. Because each new method of production produces different byproducts, continual updates will be required to detect new techniques and repeated validation of testing methods.

The requested Research Scientist III (Chemical Science) will serve as the testing lead for synthetic cannabinoids, responsible for developing, validating and managing complex analytical methods necessary to distinguish naturally occurring cannabinoids from synthetic or semi-synthetic cannabinoids. This position level is necessary because the work demands a high degree of specialized chemical science knowledge, independent judgment, and experience managing advanced analytical instrumentation and experimental design. The Research Scientist III will design feasibility studies, lead validation effort, troubleshoot instrumentation issues, and prepare technical documentation for ISO 17025 compliance.

The Research Scientist V will act as the senior scientific authority within DCC for hemp and synthetic (or semi-synthetic) cannabinoid testing. This position will provide statewide scientific leadership, participate in multi-state workgroups, monitor emerging synthetic cannabinoids, evaluate external reports and advise management on testing methodologies and public health implications. The Research Scientist V will provide strategic direction on method development priorities, ensure scientific integrity of statewide testing procedures, and make high-level decisions for interagency coordination to ensure regulatory alignment.

Together, the Research Scientist III and V positions provide operational and strategic scientific leadership essential to implementing AB 8's testing requirements. AB 8 will introduce a broad range of hemp-derived products, which will require greater analytical and scientific expertise to conduct and ensure accurate testing of cannabinoid products in the marketplace. These positions ensure DCC can maintain technical oversight, maintain scientific standards, and meet statutory and regulatory obligations.

#### **Thermo Scientific Q Exactive Plus Orbitrap LC-MS/MS System (\$600,000 one-time purchase cost)**

The LCMS/MS (Thermo Scientific Orbitrap) laboratory testing equipment requested is needed to provide a dedicated instrument for conducting this testing and researching test methodology. Detection of synthetic cannabinoids requires screening for trace byproducts of the chemical conversion process. This requires instrumentation with a high degree of sensitivity. Further, the higher volume of testing required for this market oversight requires a dedicated testing instrument.

#### **Increased contracting authority for lab testing resources (\$1.1 million one-time purchase cost plus \$700,000 in 2027-28 and ongoing)**

DCC contracts with the University of California San Diego (UCSD) for testing laboratory services. This additional testing capacity and expertise supports oversight of licensed testing laboratories and testing of samples collected by inspectors. DCC is requesting an increase in contracting authority for additional support from UCSD, including during the development of synthetic

cannabinoid testing methodology and for ongoing increases in testing work, and for additional scientific expertise necessary to implement AB 8.

## **Hemp Policy Specialist (Policy & Research Division)**

### **1.0 Supervisor I**

Workload Justification (Attachment 10)

In just six years, hemp has moved from a restricted crop to legalized crop; hemp products have changed from primarily being comprised of CBD to forms of THC and an evolving landscape of intoxicating cannabinoids. DCC's implementation of AB 8 will require continued monitoring of this rapidly changing environment and adaptation of policy and procedures.

AB 8 incorporates new cannabinoid-rich plants into the supply chain. This incorporation will have disruptions that will necessitate regulatory solutions on an ongoing basis as DCC balances multiple types of processors, manufacturing practices, laboratory testing, labeling standard and retail practices.

Implementing AB 8 will require promulgation of regulations – both at the onset and with updates in future years – but it will also add complexity to all other rulemaking packages that address issues intersecting with hemp and licensed activity.

DCC is currently in development stages for three regulatory packages, all of which will require reconsideration to account for hemp integration into the supply chain and impacts to each license type:

- Implementation of Chapter 875, Statutes of 2024 (SB 1064) to create a Combined Activities License;
- Implementation of Chapter 496, Statutes of 2023, (SB 622) to shift from individual tagging to batch tagging of cannabis plants;
- Comprehensive evaluation of existing regulations for potential modifications to strengthen and streamline requirements.

DCC will begin development of rulemaking to implement AB 8 in 2026-27 with expected completion in 2027-28, prior to the start of hemp integration on January 1, 2028. Regulatory requirements will need to be developed to address the following, at a minimum:

- Application requirements for distributors seeking a hemp license endorsement;
- Recordkeeping requirements necessary to validate that hemp entering the supply chain was obtained from a farm permitted under USDA or state agricultural department requirements;
- Production standards for the handling and processing of hemp into manufactured products;
- Testing requirements for industrial hemp entering the supply chain and hemp products leaving the market;
- Packaging and labeling requirements for products containing hemp or a mixture of hemp and cannabis;
- Requirements for hemp products and in-process hemp goods leaving the state;
- Track-and-trace requirements, including for:
  - The initial data entry and tagging of hemp entering the supply chain;
  - The recording of testing performed at the point of entry;
  - The exit of hemp products from the supply chain.

In 2028-29 and ongoing there will be a continuation of regulatory updates to clarify established requirements, address new aspects of the market, or strengthen enforcement and disciplinary procedures. Previously promulgated regulations will also need to be revisited to ensure efficient and effective implementation of AB 8. The addition of hemp into the cannabis regulatory structure is a significant, ongoing effort and existing staff cannot meet this workload need.

The Supervisor I requested will serve as a project manager for policy development and promulgation of regulations and as a subject-matter expert on hemp, ensuring that the departmental approach is based on best-available science and market information. They will be responsible for conducting initial research about policy approaches used across the country and issues unique to hemp products and the hemp market and developing a comprehensive set of regulations governing hemp's entry into and exit from the supply chain, incorporation into the track-and-trace system and record keeping necessary to substantiate that hemp was obtained from a duly-permitted farm, among other things.

Laws governing hemp and hemp-derived cannabinoid products are rapidly changing, and changes at the federal level have the potential to disrupt or significantly change policy approaches. This specialist will continuously monitor this environment, providing staff with research and technical assistance, and assessing regulations and internal business processes for needed updates. They will also support coordination between cross-functional teams and development of communication and guidance materials.

### General Workload Increases

As additional positions and workload responsibilities described above are fully realized, workload for support divisions will expand beyond absorbable levels. DCC requests additional resources in the Legal Affairs, Administration and Information Technology Services Divisions to support this increased workload.

### **Legal Affairs Division**

#### **1.0 Attorney IV**

#### **1.0 Attorney III**

Workload Justification (Attachments 11-12)

The Legal Affairs Division provides legal services to DCC staff, including drafting opinions; reviewing and drafting regulatory policy, notices of non-compliance and disciplinary actions, contracts and public guidance; and responding to subpoenas and Public Record Act requests. AB 8 will generate increased workloads for all these routine services. AB 8 will also significantly increase legal services required to support the Compliance and Enforcement Divisions in the service of disciplinary actions (license discipline and administrative actions) and law enforcement actions (criminal actions) necessary to ensure integrity of the licensed market and to combat illegal operations.

The two requested attorneys would conduct both routine work and support the preparation and service of disciplinary actions related to non-compliance with AB 8, including diversion, inversion, and production of synthetic cannabinoids. The Attorney IV will handle complex enforcement and compliance cases and provide more specialized legal assistance. The Attorney III will serve as second chair on complex cases and provide more generalized legal assistance.

AB 8 is a complex law that fundamentally changes the cannabis regulatory framework, including by allowing cannabinoid-containing plants and products to enter and exit what was a previously closed supply chain. Staff throughout DCC will require education and training on AB 8 to effectively administer the law, consistently and fairly across the state. The two requested attorneys will be expected to quickly learn the law and support program staff throughout DCC in learning and interpreting the law.

Similarly, DCC will need to develop educational materials for licensees that explain the law and businesses' obligations under it.

This workload is critical and cannot be absorbed by existing staff. As DCC has grown, the workload of the Legal Affairs Division has expanded in volume and complexity. Compliance actions have increased exponentially over the past two years, as shown in the table below, and current staff are at maximum capacity.

<b>Actions</b>	<b>2023-24</b>	<b>2024-25</b>	<b>2025-26*</b>
<b>Licensing and Compliance</b>	-	-	-
Citations and Fines	22	70	158
License Application Denials	4	31	104
License Revocations**	26	53	16
License Suspensions**	3	235	8
<b>Total</b>	<b>55</b>	<b>389</b>	<b>286</b>
<b>Legal Affairs</b>	-	-	-
Legal Services Supporting Licensing Actions**	340	620	300
Legal Services Supporting Compliance/Labs Actions	225	430	600
Legal Opinions Supporting Law Enforcement Actions	5	25	50
<b>Total</b>	<b>570</b>	<b>1075</b>	<b>950</b>

\*Projections as of December 2025.

\*\*License suspensions and revocations in 2024-25 included actions taken for provisional licenses, which were achieved summarily through an expedited legal process not applicable to annual licenses. With the transition of nearly all provisional licenses to annual licenses by the end of calendar year 2025, license suspensions in 2025-26 will require additional administrative processes, which will increase the amount of time it takes the Department to take licensing action and thus reduces the number of license actions completed each year.

Adding AB 8 workload to the Legal Affairs Division without additional resources would result in delays for required legal support and employee burnout, increasing staff turnover and reducing DCC's ability to provide the oversight and due process required by law.

## **Administration Division**

### **2.0 Analyst IIs**

Workload Justification (Attachments 13-14)

The Administration Division supports DCC staff with purchasing and human resources, among other duties. Two positions are requested to support additional workload in the Acquisitions Office and Human Resources Branch.

DCC anticipates the workload increases associated with AB 8 will result in an increase in solicitations, contract requests, and purchases. One requested Analyst II would support the Acquisitions Office and manage this increased workload.

This acquisitions work cannot be absorbed without delays in processing that would risk missing procurement deadlines set by the Department of General Services (DGS). Compliance with these deadlines is required to maintain Tier 2 purchasing authority, which allows DCC to self-manage

higher cost contracts and procurements. If deadlines are not met and Tier 2 authorization were lost, DCC staff would not be able to obtain resources needed to implement AB 8, and departmental costs for all purchases over \$5,000 would significantly increase.

DCC also anticipates the overall workload of the Human Resources Branch to increase as new positions to implement AB 8 are created and filled. The second requested Analyst II would be housed within the Classification and Recruitment Unit of the branch and be responsible for ensuring the appropriate use of civil service classifications through comprehensive analysis, audits and studies. The analyst will provide expert guidance on the development of recruitment packages, reviewing and approving all recruitment documents, and ensuring that employees are accurately classified and appropriately compensated.

## **Information Technology Services Division**

### **1.0 Information Technology Specialist I**

Workload Justification (Attachment 15)

The Information Technology Services Division supports department-wide use of technology. This includes procurement and ongoing support for software and hardware, as well as development of analytics tools and reports. In addition to typical business office software, the division also maintains specialized systems, including licensing systems and the track-and-trace program.

The requested Information Technology Specialist I position will fulfill additional generalized workload requirements associated with expanded staffing, in addition to managing changes to software systems necessary to implement AB 8. This will provide increased capacity to analyze complex datasets, develop new reports, enhance existing reports and explore and implement AI tools to improve the efficiency and efficacy of data analysis.

The additional specialist will support the Compliance Division in the analysis of hemp-related supply chain data captured in the track-and-trace system. This includes creating new anomaly reports, modifying and enhancing existing reports, and utilizing artificial intelligence tools to perform data analytics.

The Information Technology Specialist I will participate in the track-and-trace system update process to understand database structure changes. This foundational knowledge will prepare them to develop reports and understand business use cases in more detail. During the period that Metrc is developing system functionality, the specialist will be trained on the larger Metrc data model and other departmental reporting tools.

DCC takes a data-centered compliance approach, but as inspectors encounter new business scenarios in their work, reports and other data analytics tools must be updated. These updates require not only standard workloads associated with software development (writing code, testing functionality, validating data outputs), but also frequent collaborations between IT and investigatory staff to understand how observed industry trends present in the data.

## **C. Departmentwide and Statewide Considerations**

This proposal advances DCC's mission to protect public health, ensure consumer safety, and promote a transparent, well-regulated cannabis market by integrating intoxicating hemp products into the state's licensing framework. The statutory mandates of AB 8 will significantly expand DCC's regulatory oversight and enforcement responsibilities, and the requested resources are necessary for DCC to adequately and efficiently fulfill these new statutory mandates in alignment with statewide priorities. Without sufficient resources, DCC cannot effectively regulate the market or protect public safety.

AB 8 will require coordinated efforts across divisions to implement new regulations, develop training and communication strategies, and ensure alignment with legislative intent. The requested resources will also allow DCC to design and test new investigatory models for illegal

online sales utilizing civil enforcement tools. Lessons from these efforts may increase compliance with state law and reduce reliance on criminal enforcement tools. These efforts will support California's intention to regulate cannabis and hemp under a single unified framework, while avoiding re-criminalizing either drug.

Overall, this proposal supports broader statewide goals by safeguarding consumers from unsafe or mislabeled products, strengthening equitable enforcement practices, and enhancing supply chain transparency through improvements to the California Cannabis Track-and-Trace system. It will also enable greater coordination with state partners, including the Department of Public Health and the Department of Pesticide Regulation, as well as national scientific working groups addressing synthetic cannabinoids.

#### D. Outcomes and Accountability

Workload Measure*	Projected Outcomes				
	2026-27	2027-28	2028-29	2029-30	2030-31
Hemp cases completed by Attorneys	188	220	220	220	220
Hemp Online Sales Investigations completed by Special Investigators	63	125	125	125	125
Rulemaking to implement AB 8	6+	2	2	2	2
Track and Trace Program Report Creation or Review	104	208	208	208	208
Track and Trace Program Anomaly Reports for Licensees with Hemp on-site	52	104	104	104	104
Track and Trace Program Licensee Visits with Hemp on-site	26	52	52	52	52
Compliance Inspections	429	515	619	742	890
Samples Collected	252	303	363	436	524
Investigation samples analyzed for Compliance	440	529	633	760	912
Quality control samples for testing	220	264	316	380	456
Research samples (method development, method validation, method improvement)	1,500	500	200	200	200
Metrc System Enhancement Requirement Document Review	40	24	24	24	24
Metrc System Enhancement Functional Testing	40	24	24	24	24
Deliver Existing Report or Data Extract	2,200	2,200	2,200	2,200	2,200
Acquisitions AB 8 Solicitations	20	20	20	20	20
Acquisitions AB 8 Purchase Orders	58	58	58	58	58
Acquisitions AB 8 Contracts	25	25	25	25	25

\*The new positions will be hired and trained in 2026-27; therefore, the outcomes will be lower than the future fiscal years.

## **E. Implementation Plan**

### 2025-26

DCC's implementation of AB 8 began in January 2026 when the bill's enforcement provisions became effective. DCC will absorb initial implementation activities, including:

- Early enforcement against illegal hemp and online sales;
- Staff and stakeholder education about AB 8's provisions;
- Development of department-wide implementation plans;
- Preparation of hiring packages;
- Early research and regulatory development;
- Begin planning for changes to the track-and-trace and licensing systems.

### 2026-27

Upon approval of this budget change proposal:

- Begin hiring authorized positions;
- Develop the civil enforcement pilot team and conduct investigations related to online sales;
- Develop processes and procedures for implementation of new workload;
- Develop and execute contracts for procurement of equipment, supplies and expertise;
- Complete track-and-trace system development, test functionality and develop user training materials;
  - Note: It will require approximately 12 months to implement necessary changes within the track-and-trace system. Changes are initially launched into a non-production development environment to allow internal technical experts to test the changes and confirm the system is functioning as designed. During this time, training documentation will be developed, and existing documentation updated, to inform internal and external users how the updates will impact their interactions with the system.
- Solicit policy feedback from the Cannabis Advisory Committee, finalize draft regulations and begin rulemaking process;
- Solicit expert feedback on test methods to distinguish natural and synthetic cannabinoids.

### 2027-28 and ongoing

- Develop educational materials and bulletins for licensees about the incorporation of hemp into the cannabis supply chain;
- Finalize regulations and begin accepting applications for distributors to obtain a hemp license enforcement;
- Deploy new track-and-trace functionality and monitor user feedback;
- Monitor hemp movement into and out of the regulated market and investigate any data anomalies or other indicators of non-compliance;
- Finalize laboratory testing methodology for detection of synthetic cannabinoids; sample and test product, as needed;
- Continue civil enforcement actions and support court cases.

## **F. Supplemental Information**

See Attachment 1-15 for workload analyses.

# BCP Fiscal Detail Sheet

(Dollars in Thousands)

BCP Title: Hemp Enforcement and Regulation under Cannabis Framework (AB 8)

BR Name: 1115-021-BCP-2026-GB

Budget Request Summary

## Personal Services

Personal Services	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
Positions - Permanent	0.0	22.0	22.0	22.0	22.0	22.0
<b>Total Positions</b>	<b>0.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>
Earnings - Permanent	0	2,217	2,217	2,217	2,217	2,217
<b>Total Salaries and Wages</b>	<b>\$0</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>
Total Staff Benefits	0	1,438	1,438	1,438	1,438	1,438
<b>Total Personal Services</b>	<b>\$0</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>

## Operating Expenses and Equipment

Operating Expenses and Equipment	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
5301 - General Expense	0	110	110	110	110	110
5302 - Printing	0	44	44	44	44	44
5304 - Communications	0	44	44	44	44	44
5306 - Postage	0	22	22	22	22	22
5320 - Travel: In-State	0	134	134	134	134	134
5322 - Training	0	22	22	22	22	22
5340 - Consulting and Professional Services - Interdepartmental	0	1,100	700	700	700	700
5340 - Consulting and Professional Services - External	0	800	0	0	0	0
5344 - Consolidated Data Centers	0	44	44	44	44	44
5346 - Information Technology	0	66	66	66	66	66
5368 - Non-Capital Asset Purchases - Equipment	0	1,107	149	149	149	149
539X - Other	0	176	0	0	0	0
<b>Total Operating Expenses and Equipment</b>	<b>\$0</b>	<b>\$3,669</b>	<b>\$1,335</b>	<b>\$1,335</b>	<b>\$1,335</b>	<b>\$1,335</b>

## Total Budget Request

Total Budget Request	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
<b>Total Budget Request</b>	<b>\$0</b>	<b>\$7,324</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>

## Fund Summary

### Fund Source

Fund Source	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
State Operations - 3288 - Cannabis Control Fund	0	5,597	4,138	4,138	4,138	4,138
State Operations - 3335 - Cannabis Tax Fund - Department of Cannabis Control	0	1,727	852	852	852	852
<b>Total State Operations Expenditures</b>	<b>\$0</b>	<b>\$7,324</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>
<b>Total All Funds</b>	<b>\$0</b>	<b>\$7,324</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>

## Program Summary

### Program Funding

Program Funding	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
1460010 - Department of Cannabis Control - Support	0	7,324	4,990	4,990	4,990	4,990
<b>Total All Programs</b>	<b>\$0</b>	<b>\$7,324</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>	<b>\$4,990</b>

## Personal Services Details

### Positions

Positions	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
0762 - Environmental Scientist	0.0	6.0	6.0	6.0	6.0	6.0
0764 - Sr Envirnal Scientist (Supvry)	0.0	1.0	1.0	1.0	1.0	1.0
0765 - Sr Envirnal Scientist (Spec)	0.0	1.0	1.0	1.0	1.0	1.0
1402 - Info Tech Spec I	0.0	1.0	1.0	1.0	1.0	1.0
1931 - Scientific Aid	0.0	1.0	1.0	1.0	1.0	1.0
4800 - Supervisor I	0.0	1.0	1.0	1.0	1.0	1.0
5393 - Analyst II	0.0	3.0	3.0	3.0	3.0	3.0

Positions	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
5591 - Research Scientist III	0.0	1.0	1.0	1.0	1.0	1.0
5627 - Research Scientist V	0.0	1.0	1.0	1.0	1.0	1.0
5780 - Attorney IV	0.0	2.0	2.0	2.0	2.0	2.0
5795 - Attorney III	0.0	1.0	1.0	1.0	1.0	1.0
8612 - Special Investigator	0.0	3.0	3.0	3.0	3.0	3.0
<b>Total Positions</b>	<b>0.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>	<b>22.0</b>

### Salaries and Wages

Salaries and Wages	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
0762 - Environmental Scientist	0	473	473	473	473	473
0764 - Sr Envirnal Scientist (Supvry)	0	146	146	146	146	146
0765 - Sr Envirnal Scientist (Spec)	0	107	107	107	107	107
1402 - Info Tech Spec I	0	102	102	102	102	102
1931 - Scientific Aid	0	42	42	42	42	42
4800 - Supervisor I	0	96	96	96	96	96
5393 - Analyst II	0	245	245	245	245	245
5591 - Research Scientist III	0	110	110	110	110	110
5627 - Research Scientist V	0	140	140	140	140	140
5780 - Attorney IV	0	337	337	337	337	337
5795 - Attorney III	0	157	157	157	157	157
8612 - Special Investigator	0	262	262	262	262	262
<b>Total Salaries and Wages</b>	<b>\$0</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>	<b>\$2,217</b>

### Staff Benefits

Staff Benefits	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
5150900 - Staff Benefits - Other	0	1,438	1,438	1,438	1,438	1,438
<b>Total Staff Benefits</b>	<b>\$0</b>	<b>\$1,438</b>	<b>\$1,438</b>	<b>\$1,438</b>	<b>\$1,438</b>	<b>\$1,438</b>

### Total Personal Services

Total Personal Services	FY26 Current Year	FY26 Budget Year	FY26 BY+1	FY26 BY+2	FY26 BY+3	FY26 BY+4
<b>Total Personal Services</b>	<b>\$0</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>	<b>\$3,655</b>

**Workload for - 1.0 Attorney IV**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Conduct legal research and provide legal opinions on state and federal hemp authority.	100	2	200
Coordinate with the special investigators on investigations related to online sales of intoxicating hemp, assist with development of investigation plans, review investigative reports, and drafts administrative actions.	100	10	1,000
Draft administrative subpoenas, search warrants, and other legal documents for investigations related to online sales of intoxicating hemp.	25	8	200
Provide subject matter expertise for policy, regulatory, and legislative development of hemp laws.	24	2	48
Coordinate with the Attorney General's Office on litigation, administrative actions, and civil penalties cases related to online sales of intoxicating hemp.	35	10	350
<b>Total working hours</b>	-	-	<b>1,798</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

Legal Affairs

**Workload for – 3.0 Special Investigator**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Review complaints and identify cases for investigation of online sales of intoxicating hemp.	300	1	300
Develop investigation plans for investigations of online sales of intoxicating hemp and related activity.	125	5	625
Conduct investigations of online sales of intoxicating hemp and related activity. Reviews records, interviews witnesses, and conducts other investigatory activities. Drafts report of investigation.	125	35	4,375
Coordinate with attorneys on administrative and civil penalty actions. Provides testimony at hearing.	37	10	370
<b>Total working hours</b>	-	-	<b>5,670</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>3.2</b>

## Compliance

**Workload for – 1.0 Senior Environmental Scientist (Specialist)**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Develop inspection training curriculum and update guidance.	4	150	600
Research hemp/synthetic cannabinoid market trends.	12	40	480
Act as liaison with stakeholders and coordinate scientific input.	24	20	480
Draft technical memos, policy guidance, and inspection protocols.	12	18	216
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Compliance

**Workload for – 1.0 Senior Environmental Scientist (Supervisor)**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Staff Supervision & Mentoring. Conduct one-on-one check-ins, mentor staff, and complete probationary/annual evaluations for 1 Specialist, 7 Scientists, and 1 Scientific Aid.	120	4	480
Workload Assignment & Report Review. Assign inspections/sampling work; review inspection, sampling, and enforcement reports for accuracy and consistency with Department policy.	500	1.5	750
Program Oversight & Operations. Plan, coordinate, and monitor branch operations (scheduling inspections, ensuring timeliness of sampling/investigations, resolving workload barriers).	48	4	192
Stakeholder & Interagency Coordination. Liaise with law enforcement, regulatory partners, and Division leadership regarding hemp entry, synthetic cannabinoids, and enforcement cases.	24	5	120
Training & Policy Support. Collaborate with Specialist to develop training materials, provide technical feedback on inspection protocols, and support program policy development.	12	6	72
Administrative & Personnel Management. Approve timesheets, leave requests, oversee branch compliance with HR/Division policies.	24	6.8	162
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Compliance

**Workload for – 6.0 Environmental Scientist**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Conduct distribution license inspections (fieldwork).	360	12	4,320
Document inspections, prepare reports, and input data into system.	360	6	2,160
Issue violation notices and track follow-up actions.	180	8	1,440
Coordinate with compliance staff, prepare case materials.	216	10	2,160
Attend training and staff meetings.	72	8	576
<b>Total working hours</b>	-	-	<b>10,656</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>6.0</b>

Compliance

**Workload for – 1.0 Scientific Aid**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Collect field samples of suspected synthetic cannabinoid products.	60	10	600
Prepare, transport, and log field samples.	60	6	360
Enter inspection and lab data into Department systems.	120	5	600
Assist with field investigations and provide technical support.	18	12	216
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

Compliance

**Workload for – 1.0 Analyst II**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Develop anomaly detection reports to track hemp movement.	12	80	960
Collaborate with Metrc to design system enhancements.	12	40	480
Prepare data summaries and compliance monitoring reports.	12	20	240
Internal/external stakeholder communication, user support.	12	8	96
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Compliance

**Workload for – 1.0 Research Scientist III (Chemical Science)**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Develop and validate cannabinoid assay methods (distinguish Phyto cannabinoids vs synthetic/semi-synthetic).	6	120	720
Laboratory testing and method optimization (instrument calibration, data analysis, Quality Assurance/ Quality Control).	24	20	480
Prepare technical reports, Standard Operating Procedures, and validation documentation.	12	25	300
Collaborate with internal staff, provide training on new testing protocols.	12	15	180
Participate in technical meetings, presentations, and regulatory discussions.	12	8	96
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

Compliance

**Workload for – 1.0 Research Scientist V (Chemical Science)**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Lead multi-state scientific workgroups on synthetic cannabinoids.	6	100	600
Monitor and assess emerging synthetic cannabinoid trends/methods.	24	25	600
Provide scientific consultation to executive management, legal, and policy staff.	24	15	360
Review and evaluate external lab reports and investigations.	12	12	144
Publish or present scientific findings, contribute to policy guidance.	6	12	72
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Policy &amp; Research

**Workload for – 1.0 Supervisor I**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Research and analyze federal policy updates	12	4	48
Research and analyze policy updates in other states	12	16	192
Engagement with state and local regulatory partners	12	4	48
Engagement with regulatory counterparts through the Cannabis Regulators Association	50	2	100
Lead and facilitate policy development meetings with subject matter experts	12	6	72
Draft, update, and present policy memos with analysis and recommendations	6	40	240
Draft regulatory text, statement of reasons, public notice, economic and fiscal impact analysis, press release, communications plan, and corresponding memos	4	120	480
Regulatory workshops	4	4	16
Prepare briefing materials for Deputy Director	12	6	72
Research, evaluate, and monitor program implementation	24	4	96
Draft communication materials for website updates, e-blasts, stakeholder outreach	12	24	288
External stakeholder engagement, education and outreach	8	12	96
Respond to public inquiries	24	2	48
Strategic planning - implementation, internal comms, program training	8	36	288
Required annual training, workload tracking	12	2	24
<b>Total working hours</b>	-	-	<b>2,108</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.2</b>

Legal Affairs

**Workload for - 1.0 Attorney IV**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Conduct legal research and provide legal opinions on state and federal hemp authority.	100	3	300
Coordinate with the special investigators on investigations related to online sales of intoxicating hemp, assist with development of investigation plans, review investigative reports, and drafts administrative actions.	100	10	1,000
Draft administrative subpoenas, search warrants, and other legal documents for investigations related to online sales of intoxicating hemp.	25	8	200
Provide subject matter expertise for policy, regulatory, and legislative development of hemp laws.	20	2	40
Coordinate with the Attorney General's Office on litigation, administrative actions, and civil penalties cases related to online sales of intoxicating hemp.	25	10	250
<b>Total working hours</b>	-	-	<b>1,790</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Legal Affairs

**Workload for - 1.0 Attorney III**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Conduct legal research and provide legal opinions on state and federal hemp authority.	75	4	300
Coordinate with the special investigators on investigations related to online sales of intoxicating hemp, assist with development of investigation plans, review investigative reports, and drafts administrative actions.	75	12	900
Draft administrative subpoenas, search warrants, and other legal documents for investigations related to online sales of intoxicating hemp.	20	10	200
Provide subject matter expertise for policy, regulatory, and legislative development of hemp laws.	40	2	80
Coordinate with the Attorney General's Office on litigation, administrative actions, and civil penalties cases related to online sales of intoxicating hemp.	30	10	300
<b>Total working hours</b>	-	-	<b>1,780</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

Administration

**Workload for – 1.0 Analyst II**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Provide consultation on recruitment and hiring.	500	0.5	250
Review and approve Requests for Personnel Action (RPA).	100	1	100
Review and determine candidate eligibility.	100	1	100
Process eligibility withholds and prepares withhold letters, respond to appeals on withholds; prepare appeal response letters.	30	1	30
Respond to merit issue appeals; prepare merit issue appeal letters.	30	24	720
Review and approve pre-employment documents.	100	0.5	50
Audit RPA; prepare and process RPA for keying.	125	1	125
Review and approve training and development assignments, Out of Class, memorandum of understandings, unlawful appointments, administrative time off.	20	6	120
Manage and reveal all job applications and application documentation to the hiring programs.	500	0.5	250
Provide ECOS training to department staff.	2	2	4
<b>Total working hours</b>	-	-	<b>1,749</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

Administration

**Workload for – 1.0 Analyst II**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Solicitations	20.0	30.0	600.0
Contract Requests - New	25.0	15.0	375.0
Contract Requests - Amendments	5.0	10.0	50.0
Purchase Order Requests	58.0	5.0	290.0
Public Records Act (PRA) Requests	20.0	4.0	80.0
Small Business and Disabled Veteran Business Enterprise reporting, communication, and education	12.0	1.0	12.0
Communication with divisions - Questions (Acquisitions inbox, Teams)	502.0	0.5	251.0
Communication with divisions - Training	4.0	5.0	20.0
Communication with external vendors, organizations, and control departments	75.0	0.5	37.5
ADA Compliance	30.0	2.0	60.0
<b>Total working hours</b>	-	-	<b>1,776</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>

## Information Technology

**Workload for – 1.0 Information Technology Specialist I**

<b>Task Performed</b>	<b>Number of Tasks</b>	<b>Hours to Perform</b>	<b>Total Hours</b>
Create new or modify existing track and trace reports using a variety of reporting tools. Meet with staff to discuss reporting requirements. Demonstrate report functionality. Perform system testing of new or modified reports.	75	8	600
Review track and trace system enhancement documentation. Provide feedback and recommended edits. Consult with business stakeholders to answer questions related to technical design aspects.	20	8	160
Perform functional testing for Metrc software releases.	20	16	320
Run and distribute existing track and trace reports using a variety of reporting tools. Review results with business stakeholders.	1,100	0.5	550
Participate in operational meetings (daily standups, client demonstrations, incident management, informal consultation).	120	1	120
<b>Total working hours</b>	-	-	<b>1,750</b>
<b>Hours per year, per PY</b>	-	-	<b>1,776</b>
<b>Total PYs</b>	-	-	<b>1.0</b>