**Frequently Asked Questions regarding Program Information Notice 19-06**

**Possession and Use of Cannabidiol (CBD)-Containing Products by Job Corps Students**

1. **What is the direction provided in PIN 19-06?**

Job Corps students are permitted to possess cannabidiol (CBD)-containing products as long as they do not contain tetrahydrocannabinol (THC), and possession of these products is not a violation of Job Corps’ zero-tolerance policy.

1. **What is CBD?**

CBD can be extracted from both hemp and marijuana plants. While hemp and marijuana plants look similar, there are distinct differences between the two – mainly the amount of CBD and THC in each plant. CBD is a compound found in hemp plants. CBD is not psychoactive, nor will it cause someone to experience mood-altering effects. The hemp used is naturally the low-THC variety, and there are many differences between THC effects and CBD effects. CBD is a cannabis-derived cannabinoid that research suggests may support wellness by interacting with the body’s regulatory system, the endocannabinoid system. First discovered in the late 1980's, the endocannabinoid system regulates the body's homeostasis, or general state of balance.

1. **What guidance can be given regarding PIN 19-06 and CBD on Job Corps centers?**

TEAP specialists and other Health and Wellness staff should educate students about the risks of using unregulated and homemade CBD products. Those risks include testing positive on a urine drug screen if the CBD product they are using contains THC. Students should be discouraged from using CBD products if they are in the intervention period. There is no reliable way to determine if a student tests positive because of their marijuana use or because they used a CBD product made from marijuana. Consequences outlined in the PRH should be followed for any student who tests positive for THC on either the entry, suspicion, or 45-day urine drug screens. TEAP specialists should educate students about this issue.

1. **Do CBD products contain THC?**

YES, but usually only in trace amounts. All CBD products contain trace amounts of THC (usually less than 0.3 percent). However, some CBD products contain significant amounts of THC and those products are made from marijuana and not hemp. As PIN 19-06 explains - there is a significant difference between CBD products that are entirely hemp-based and those which contain large amounts of THC. If there are large amounts of THC in the CBD product, the user will experience a psychoactive effect, typically the intoxication or “high” associated with marijuana use.

It is difficult to determine how much THC some of the CBD products contain, especially if the product is not in the original packaging or is homemade. This industry remains largely unregulated so there is also the possibility that the CBD oils that say they are not THC-based, may still contain more than trace amounts of THC.

1. **What are the different types of CBD-based products?**

There are many CBD products legally available at this time, including:

* CBD Oil
* CBD Capsules
* CBD Edibles
* CBD Tinctures
* CBD Vape Oil
* CBD Skincare Products
* CBD Pet Products

1. **Where can these products be purchased?**

CBD products made from hemp are federally legal in the United States. The legality of CBD products was reinforced with the passing of the 2018 Farm Bill, which fully removed hemp from the Controlled Substances Act, making it a commercial commodity in the country. They can be purchased either on-line or at various locations such as convenience stores and large retailers as well.

1. **If someone ingests CBD oil that contains significant amounts of THC, will they test positive on a drug screen?**

If a student ingests a CBD product with significant amounts of THC in it they may test positive for THC. This may be more of an issue in states where recreational marijuana is legal and so CBD oil made from marijuana (and not hemp) may be legally purchased and even commonly available. Manufactures of hemp-based CBD products DO NOT recommend that individuals who are subjected to urine drug testing consume or use these products.

1. **How do you identify whether CBD products contain more than trace amounts of THC?**

Often the only way to ascertain this is by reviewing the packaging of the CBD product. If students plan to bring CBD products to center, they should be in possession of the original packaging that confirms that the CBD has only trace amounts of THC (defined as less than 0.3%). A reputable CBD seller should only sell products that have a [certificate of analysis (COA)](https://gcc01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmadebyhemp.com%2Fcertificate-of-analysis-coa-how-to-read%2F&data=02%7C01%7CThomas.Cassandra%40dol.gov%7Ca9219c24e2ad4b20167208d7832ce324%7C75a6305472044e0c9126adab971d4aca%7C0%7C1%7C637122101122891766&sdata=eOcQs%2Fm2wunq4fZHreHaiTGuxKCaBCRY7pNhij5uqO0%3D&reserved=0) for their products which will show both the CBD and THC levels.

If the original packaging is not available, it will be very difficult to determine how much THC a CBD product contains. If the container is already open, it will also be difficult to determine if the contents are the original contents.

1. **Can bakery goods such as muffins and cookies contain CBD products?**

Yes. Just like THC-based products, this can be in the form of edibles or in bakery products. It is difficult to detect if the bakery products have CBD added to them, just as it is difficult to determine if products contain THC.

1. **What if a medical provider prescribes a CBD product for a student?**

Only CBD-products made from Hemp are permissible at Job Corps. These products are typically available without a prescription. However, if a medical provider is recommending a CBD product, then the Job Corps center physician or designee should coordinate with that medical provider to determine how to proceed. Also the student should be educated to ensure they are aware of the risk for testing positive.