



Division of Cannabis Regulation

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INFORMATIONAL BULLETIN OCTOBER 2025

Discontinuation of “Recurring” Background Checks

BULLETIN SUBJECT/PURPOSE

The Department has resolved to **discontinue the practice of recurring Background Checks** for Cannabis Industry Principal Officers, Board Members, Agents-in-Charge, and/or Agents.

The Department will **require Background Checks only for prospective Principal Officers, Board Members, Agents-in-Charge, and Agents submitting an initial application** for Licensure or Identification Card to a Licensee with which the applicant is not already associated.

BACKGROUND

Following the State of Illinois’ adoption of the “Compassionate Use of Medical Cannabis Program Act” (effective 9 August 2019), the Department has maintained the practice of **both initial and recurring Background Checks** for Principal Officers, Board Members, Agents-in-Charge, and/or Agents. From 2019 to 2025, this practice facilitated the development of an industry workforce both complementary to workplace safety and security and compliant with the Background Check requirements stipulated in the “Compassionate Use of Medical Cannabis Program Act” and “Cannabis Regulation and Tax Act” (effective 01 January 2020).

In recognition of an established and vetted “2025 Illinois Cannabis Industry Workforce,” the Department will now discontinue the practice of **recurring** Background Checks and will utilize Background Checks submitted with initial applications to maintain the industry’s current safety and security posture.

GUIDANCE

Background Checks will be required only for prospective Principal Officers, Board Members, Agents-in-Charge, and Agents submitting an initial application for Licensure, or submitting an initial application for Identification Card, to a Licensee and/or Ownership Structure with which the applicant is not already associated.

“Initial Application” is defined as: Any application submitted by a prospective Principal Officer, Board Member, Agent-in-Charge, or Agent that represents a first step toward association with a Licensee and/or Licensee Ownership Structure.

Any “**recurring**” Background Checks (i.e. Background Checks **other than** the Background Check required for Initial Application for Licensure or Agent Identification Card with a particular Licensee and/or Licensee Ownership Structure) that are “in-progress” upon the date of this Bulletin’s issuance should be allowed to proceed. The Department will review the results, as usual, and will address any consequential findings according to the established process. For any recurring Background Checks that are planned, but for which the renewing individual has not yet submitted payment, the Department encourages Licensees to notify relevant Principal Officers, Board Members, Agents-in-Charge, and/or Agents of the change communicated via this Bulletin as soon as possible.

Cannabis Licensees should not view this change in Department practice regarding Background Checks as an indication of a “preferred” or “sanctioned” periodicity standard. Licensees are encouraged to invest in Background Checks as frequently as the Licensee deems appropriate.

Example #1: If Agent-in-Charge “Joe Smith” leaves “Cultivator X” to seek employment with “Cultivator Y,” Joe Smith must submit an “initial application,” including a Background Check, supporting his prospective association with “Cultivator Y.”

Example #2: If Craft Grower Principal Officer “Jill Smythe” sells interest in “Craft Buds” and purchases interest in “Bud Crafts,” Jill Smythe must submit an “initial application,” including a Background Check, supporting her association with the “Bud Crafts” Ownership Structure.

Example #3: If Agent “Tom Dooley” receives a promotion to “Agent-in-Charge,” he has no requirement to undergo another Background Check. He is still affiliated with the Ownership Structure under which he submitted his initial application for Agent Identification.

Example #4: If Agent “Alice Wonderland” applies for a Transporter Badge under the same Ownership Structure for which she is currently working, she has no requirement to undergo another Background Check. However, in this situation, the Department would suggest that the Licensee confirm both the currency of Alice’s Driver’s License, and that no restrictions are annotated thereupon that might affect Alice’s ability to operate a motor vehicle.

Example #5: If Agent “Dana Andrews,” who works for Licensee “ABC” at its Chicago location, has a requirement to access Licensee “ABC’s” Springfield location, Agent Dana Andrews has no requirement to undergo another Background Check. He is still affiliated with the same Licensee Ownership Structure under which he submitted his initial application for Agent Identification.

Agent ID Renewals: This discontinuation of recurring Background Checks does not change the requirement to update Agent IDs on an annual basis. For Agent ID Renewal Requirements, please reference:

- Title 8 “Agriculture and Animals,” Chapter I “Illinois Department of Agriculture,” Subchapter v: “Licensing and Regulations,” Part 1300 “Cannabis Regulation and Tax Act”
 - Section 1300.165 “Agents and Identification Cards”
 - Paragraph k) “Renewal of Agent Identification Cards”
 - Sub-paragraph 1) “ID cards issued under the Act shall be renewed annually.”
 - Section 1300.245
 - Paragraph l) “Renewal”
 - Sub-paragraph (1) “CC (Community College) Program agent-in-charge and agent ID cards shall be renewed annually.”
 - Section 1300.365
 - Paragraph f) “Renewal”
 - Sub-paragraph 1) “The craft grower agent ID cards shall be renewed annually.”
 - Section 1300.465
 - Paragraph f) “Renewal”
 - Sub-paragraph 1) “The infuser agent ID card shall be renewed annually.”
 - Section 1300.590
 - Paragraph j) “Transporter agent ID cards shall be renewed annually.”

QUESTIONS

For questions and feedback related to this Information Bulletin, please contact the Illinois Department of Agriculture, Division of Cannabis Regulation by emailing AGR.AdultUse@Illinois.gov.