



**DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY CADET COMMAND
204 1ST CAVALRY REGIMENT ROAD
FORT KNOX, KENTUCKY 40121-5123**

ATCC-PAP (600-85a)

1 November 2023

MEMORANDUM FOR

**Commanders, All Units Reporting Directly to This Headquarters
Directors and Chiefs, Primary and Special Staff Offices, HQ USACC**

**SUBJECT: Policy Memorandum 1-7- Hemp/Cannabidiol (CBD) and Delta-8
Tetrahydrocannabinol (THC) Substance Abuse Policy**

1. References:

a. Under Secretary of Defense Memorandum: Adoption of Punitive General Orders to Address Use of Hemp Products, 26 Feb 2020.

b. Department of the Army Memorandum, Update to the DA Drug Test Panel: Tetrahydrocannabinol (THC) Delta-8, 07 Jul 2021.

c. Army Regulation (AR) 600-85, The Army Substance Abuse Program.

d. AR 145-1, Senior Reserve Officers' Training Corps Program: Organization, Administration, and Training.

e. USMEPCOM Regulation 40-8, Medical Services Department of Defense (DoD) Human Immunodeficiency Virus (HIV) Testing Program and Drug and Alcohol Testing (DAT) Program.

f. Cadet Summer Training (CST) Policy Letter 23 - Drug Testing for Cadets, USACC Cadre, 2LT and Department of the Army Civilians.

2. Applicability: This policy applies to USACC Senior ROTC Cadets.

3. Purpose. To ensure awareness of the DoD prohibition against using Delta-8-THC and provide guidance for positive test results for ROTC Cadets and members of the Green to Gold Active Duty Option (GTG-ADO) Program.

a. Delta-8-THC is a psychoactive substance found in the Cannabis sativa plant of which marijuana and hemp are derivatives. Both are now being sold as an ingredient in various products such as vape products and liquids. Delta-8-THC can also be manufactured from hemp-derived cannabidiol, which is also a prohibited substance.

ATCC-PAP (600-85a)

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b. Products containing Delta-8-THC are not regulated by the Food and Drug Administration and are often mislabeled as to their Delta-8-THC content.

c. Hemp products may legally contain up to 0.3 percent Delta-9-THC on a dry weight basis. As a result, the use of hemp/CBD products is prohibited in AR 600-85, para. 4-2, as directed by DoD.

4. Responsibilities. Professors of Military Science (PMS) are responsible for ensuring all ROTC Cadets understand the current Army and USACC policies prohibiting the use of CBD and Delta-8-THC.

a. If a ROTC Cadet, who is not a member of the GTG-ADO Program, tests positive for Delta-8-THC, the PMS will counsel the Cadet in writing. If a Cadet is enrolled in the Simultaneous Membership Program, the PMS will notify the Cadet's owning Reserve unit of the positive test. The Cadet will be retested on the 91st day following the first Delta-8-THC positive result test date. If the Cadet tests positive on the second urinalysis, the PMS will initiate disenrollment proceedings pursuant to reference 1d. The basis for disenrollment will be: "It is discovered that a fact or condition exists that will bar a Cadet for appointment as a commissioned officer, to include a positive urinalysis for drug and alcohol abuse," under paragraph 3-43a. (11). If the Cadet tests negative on the second urinalysis, then the PMS may request a waiver to commission with a positive urinalysis or initiate disenrollment. Refer to CST Drug Testing Policy Letter (reference f) for specific guidance pertaining to urinalysis testing conducted while Cadets are on active duty for training orders.

b. If a Soldier, who is a member of the GTG-ADO program, tests positive for Delta-8-THC, that Soldier's PMS will counsel the Soldier in writing and immediately notify the Commander, HHD, USACC. The Commander, HHD, USACC will refer the Soldier, under Command referral (Not a urinalysis positive referral) to the Substance Use Disorder Clinical Care for a clinical evaluation. The Soldier will be referred to the Army Substance Abuse Program to attend the mandatory two-day Prime for Life educational course. Prior to taking any disciplinary action against a Soldier for a positive Delta-8 THC urinalysis, the Commander, HHD, USACC will consult with the servicing judge advocate and forensic toxicology experts for advice on adjudication. The Commander, HHD, USACC will then, at his or her discretion, take UCMJ action as appropriate, and will initiate administrative separation as required by AR 635-200, paragraph 14-12c (2), before initiating disenrollment.

5. General. A positive drug test for Delta-8-THC will not be reported to the National Instant Criminal Background Check System database by law enforcement.

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6. Point of contact for this policy is the USACC Chief of Soldier and Family Programs,
Ms. Shannon Viau, at (502) 624-5297 or shannon.a.viau.civ@army.mil.

A handwritten signature in black ink that reads "Antonio Munera". The signature is written in a cursive style with a large initial "A".

ANTONIO V. MUNERA
Major General, USA
Commanding