

## Secure Transportation FAQs

Q1: How can a secure transportation company or licensee satisfy the regulatory requirement that a secure transport vehicle be equipped with “locked and secure storage containers anchored to the inside of the vehicle”?

A1: The Commission will carefully review all information submitted with the Secure Transport Vehicle Registration Form, including photographs and descriptions of storage containers and means by which they are anchored to the inside of the vehicle, to determine whether storage containers are adequately locked and secure. To meet this regulatory standard, containers must be:

- Locked shut in a manner which will prevent the contents from falling out of the containers if they are dropped or shift in a collision; and
- Securely fastened to the interior of the vehicle in a manner that will prevent the containers from sliding out of place.

Fastening plastic containers to the interior of the vehicle with bungee cords would not meet this regulatory standard.

Alternatively, a registered secure transportation company or licensee may install a secure area within the body or compartment of the vehicle that contains solid or locking metal partitions, cages, or high strength shatterproof acrylic.

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Q2: Secure storage containers may not be accessible while in transit. What does that mean?

A2: The vehicle must be partitioned so that the area in which the storage containers are secured cannot be accessed (i.e., reached) from the area in which any registered secure transportation agent is located while the vehicle is in transit.

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Q3: Can a vehicle that is registered in the name of the owner of a registered secure transportation company or licensee be registered as a secure transport vehicle?

A3: No. The vehicle must be registered in the name of the registered secure transportation company or licensee.

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Q4: If a licensed grower and a licensed processor are vertically integrated, does each need to have its own secure transport vehicle, or may both utilize the same secure transport vehicle?

A4: If both licenses are under common ownership and control and the registered agent operating the secure transport vehicle is dually registered as an agent of both licensees, a secure transport vehicle registered in the name of either licensee may be used by both licensees to transport medical cannabis.

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Q5: The employees of a secure transportation company must be “bonded.” What does that mean?

A5: A secure transportation company must cover its employees under a fidelity bond, which is an insurance policy designed to protect against the risk that an employee will intentionally steal from or damage the property of his employer or one of his employer's clients.

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Q6: Can any registered agent of a licensed grower, processor, or dispensary transport medical cannabis?

A6: A registered agent of a licensee may transport medical cannabis in the licensee’s registered secure transport vehicle if the registered agent has a valid driver’s license.

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Q7: How will the Commission require a secure transportation company or licensee to demonstrate that a registered agent authorized to operate a secured transport vehicle possesses a valid driver’s license?

A7: It is the responsibility of a secure transportation company or licensee to ensure that registered agents who operate its secure transport vehicle(s) possesses a valid driver’s license. A secure transportation company or licensee should obtain the driving record for agents who operate secure transport vehicles bi-annually (i.e., once every 6 months). Agents’ driving records should be stored in personnel records on-site and made available to the Commission upon demand.

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Q8: A secure transportation company is required to provide the Commission with proof that its agent’s fingerprints were submitted to CJIS and the FBI in order to register the agent. What type of proof should the secure transportation company provide?

A8: When an agent is fingerprinted at CJIS, CJIS submits the live-scan fingerprints for both the state and the federal background check and provides the agent with a receipt number.

A secure transportation company should provide the Commission with the CJIS receipt number to prove that the agent's fingerprints were submitted to CJIS and the FBI.

When an agent is not fingerprinted at CJIS (i.e., at an authorized fingerprinting location outside of the State of Maryland), the agent must mail the fingerprint cards, along with the completed Application for Criminal History Record Check, to CJIS. A secure transportation company should report the postal tracking number to the Commission to prove that the agent's fingerprints were submitted to CJIS and the FBI.

Fingerprint cards should be mailed to the following address:

CJIS-Central Repository  
6776 Reisterstown Road  
Suite 102  
Baltimore Maryland 21215

Licensees and secure transportation companies with additional questions about the fingerprinting process should visit <https://www.dpscs.state.md.us/publicservs/bgchecks.shtml> or call CJIS at (410) 764-4501.

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