

What to Expect when We're Inspecting



The Maryland Cannabis Administration (MCA) is responsible for ensuring that all cannabis licensees maintain the licensed premises in a manner consistent with Maryland statutes and [regulations](#). To that end, MCA conducts regular inspections of all licensees. In order to ensure the best possible experience for our licensees, MCA is publishing this guidance to inform all licensees about the inspection process and answer some frequently asked questions.

During all inspections, MCA investigators will be taking notes and photographing the facility. MCA may ask for video files to demonstrate an operational licensee's retention of video surveillance for 90 days. MCA staff will abide by all licensee requirements concerning PPE, jewelry, masking, etc. MCA staff are not considered visitors under the Code of Maryland Regulations (COMAR) and do not need to be escorted throughout the facility. However, it will be helpful to have a licensee staff member accompany MCA investigators in order to answer questions or address concerns.

Types of Inspections

MCA generally performs five types of inspections: two pre-licensing types of inspections and three types of inspections for active licensees:

Pre-Licensing Walk-Through: These inspections are informal and conducted during the build-out phase for conditional licensees. During a walk-through inspection, MCA staff will observe the progress of the build-out and note any issues or potential issues that should be corrected or avoided as the build-out continues. The walk-throughs will occur about once a month during the build-out phase and can be scheduled by MCA or by you. MCA strongly recommends scheduling a walk-through before closing in vault walls or covering drains. Walk-through inspections can be scheduled, usually within a few days, by contacting the investigator assigned to your application. No reports are provided after a walk-through inspection, but investigators will address concerns they observe in real time and document them in MCA records for follow-up at the next inspection. Walk-throughs usually last between 15 minutes to an hour, depending on the progress of the build-out and what, if any, issues are noted.

Pre-Licensing Inspection: This is the final inspection prior to licensure. MCA staff will conduct a thorough inspection of the premises to ensure compliance with all applicable regulations. This will include security systems, vaults, display of public health materials and advertising compliance, to name a few. These inspections take several hours and will be attended by multiple MCA investigators, usually between 6 and 12. Once this inspection is completed, you will be provided with written documentation concerning the findings and identifying any issues found by MCA. If there are issues with the premises that must be addressed, another inspection will be scheduled to verify the remediation. The Pre-Licensing Inspection should be scheduled by you when you believe the premises are ready to be operational. Generally, MCA schedules these inspections about two weeks after the request, and we expect that a final licensing decision will be made within 30 days of the licensee passing the Pre-Licensing Inspection, provided all required documents have been submitted to MCA. You will be notified of any deficiencies and of MCA's final licensing decision in writing.

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Announced Inspection: MCA conducts at least one announced inspection of each licensee per year. The investigator assigned to your business will contact you to schedule this inspection. Each inspection will cover compliance with the regulations applicable to your license type; inspections may focus on equipment, security, inventory, green waste procedures, etc. During these inspections, investigators will spot check inventory and METRC compliance and ask to see sales records and logs related to green waste and visitors. If any violations are found, licensees may receive notices of fines and/or letters of non-compliance after the inspection. These violations are recorded in each licensee's file and may serve as aggravating factors in subsequent investigations that find violations. Investigators will also observe any exterior signage and refer potential advertising violations to MCA's Division of Regulatory Affairs and/or the Office of the Attorney General. Licensees will receive a written exit briefing after each inspection that addresses areas of compliance and violations.

Post Licensure Operational Review: At some point within the first 90 days of a licensee's operation, MCA will conduct a thorough inspection of the newly operational licensee. This inspection is not scheduled in advance and can occur at any time. This inspection usually takes 2-3 hours to complete. This will be MCA's opportunity to establish a baseline for future inspections and alert newly operational licensees to issues that arise once operations begin. MCA will inspect all items that were part of the Pre-Licensing Inspection and a written exit briefing will be provided to the licensee. There will usually be two or three MCA investigators present for this inspection.

Periodic Inspection: Most of MCA's licensee inspections are unannounced. Licensees can expect between 2 and 5 unannounced inspections annually; the number may be more or less depending upon past issues or violations observed. MCA will review the licensee's compliance with COMAR and issue any appropriate violations. These inspections are not announced in advance. Licensees will receive a written exit briefing after each periodic inspection.

How to be Prepared for an Inspection

The best way to be prepared for an inspection is to maintain strict compliance with COMAR regulations. COMAR is accessible for free at [this link](#). Familiarize yourself with the regulations and revisit them often because they are subject to change.

MCA will not provide a "checklist" for licensee inspections; the checklist is COMAR.

Make sure all documentation is up to date and accurate. This includes, but is not limited to, current SOPs, personnel and training records, and visitor and green waste logs.

Reminders

When MCA investigators appear for an inspection, a licensee may not deny them entry; all MCA staff will provide identification upon request but must be permitted on the premises to conduct the inspection. If a licensee refuses entry to MCA personnel, the licensee will be subject to discipline, including fines, suspension or revocation.

For licensees not yet operational at a location, all pre-licensing inspections, including walk-through inspections, will be scheduled at a mutually agreed upon time.

During an inspection, investigators will ask for documents such as training records or green waste logs. These documents must be provided to the investigator at the time of the request or within a time period identified by the investigator. If a licensee refuses to provide requested records or information, the licensee will be subject to discipline, including fines, suspension or revocation.