



The following guidance is provided by the Maryland Cannabis Administration (MCA) to assist cannabis licensees comply with State laws and regulations governing the cannabis industry. This document is not legal advice. It is meant to highlight operational changes for **all licensed businesses**. Please consult an attorney if you have any questions regarding the legal requirements that apply.

Highlighted Updates

Recent regulatory updates make certain changes for all licensees effective September 14, 2026, including but not limited to the following:

- Establishing a process for conditional licensees to request up to two six-month extensions under certain circumstances.
- Defining “medical and therapeutic claim,” as any representation that indicates cannabis will improve, relieve, treat, diagnose, or prevent health conditions or any other ailment.
- Defining “sublingual pouch” as a permeable sachet containing cannabis concentrate that is intended to be dissolved in the mouth and absorbed buccally or sublingually.
- Adding sublingual pouches as an approved cannabis product with specific packaging and labeling requirements.
- Establishing discovery procedures for hearings before the MCA regarding agency actions.

UPDATE! Packaging & Labeling

The MCA issued additional guidance on compliant packaging and labeling under the new regulatory requirements. This guidance may be found on cannabis.maryland.gov.

UPDATE! Conditional Licensee Extensions

Conditional licensees may request two six-month extensions to their conditional license period under certain circumstances. The MCA issued additional guidance on conditional license extensions under the new regulatory requirements. This guidance may be found on cannabis.maryland.gov.

For the first six-month extension, the conditional licensee must document and demonstrate:

- active interest in; *or*
- legal control of; *or*
- legal possession of a suitable premises.

The MCA will accept documentation of active interest such as a letter of intent, an option to lease or purchase the proposed premises, or other documentation evidencing permission for use of a premises for cannabis operations.

Version 9 - this document was updated on August 31, 2026 to reflect recent updates and is current with the MCA's guidance, regulation, and compliance efforts. The MCA reserves the ability to alter guidance to align the State's cannabis program with Maryland law and policy.

For the second six-month extension, the conditional licensee must document and demonstrate:

- legal control of; *or*
- possession of a suitable premises.

The MCA will accept documentation of legal control or possession such as a clear legal title, a fully executed or binding lease agreement, or other documentation evidencing control or possession of a premises.

If a political subdivision has unduly burdened a licensee's efforts towards becoming operational, the conditional licensee must provide documentation of the burden. The MCA will review this documentation and use its discretion to make a determination regarding the requested extension.

Pilot Authority

MCA may require licensees to participate in pilot programs. Any pilot program operated by the MCA will be aimed at improving the efficacy of cannabis regulations and easing the regulatory burden for licensees. No documents produced by the licensee during the pilot program can be used in a compliance case against the licensee.

Should MCA operate a pilot program, licensees will be selected to participate based on objective criteria and given at least 60 days notice. If a licensee has participated in a pilot program in the prior 6 months or would experience undue hardship by participating in the pilot program, they may submit a written request to be excluded from participation. MCA will make the final determination about participation in the pilot program.

UPDATED! Cannabis Delivery

Through June 30, 2027, a standard dispensary licensee or registered delivery service may continue to deliver cannabis to qualifying patients and registered caregivers **only**. Micro dispensaries may deliver cannabis to qualifying patients, registered caregivers, and adult-use consumers in accordance with COMAR 14.17.12.03.

Beginning July 1, 2027, a standard dispensary may not operate a delivery service as defined in COMAR 14.17.01, unless the standard dispensary:

1. Has a qualifying partnership with a micro dispensary to conduct delivery services on behalf of the standard dispensary; or
2. Otherwise partners or contracts with a micro dispensary to conduct delivery services for the standard dispensary.

For more information on micro dispensary operational requirements and dispensary partnerships see MCA's [Micro Dispensary Guidance](#).

Other Operational Considerations

- Prior to making any modification or renovations to certain areas of a licensed premises, licensees must receive prior approval by the Administration. Licensees should use MCA's [Request for Modification/Renovation of Premises Form](#) to be granted approval for their proposed modification or renovation.
- Visitors to any operational areas of the premises must be continually, physically supervised at all times while on the premises. Video surveillance does not suffice for meeting supervision requirements. For growers and processors, individuals who are on the premises for the narrow purposes of package delivery, or other services that do not involve areas of the premises used for cannabis cultivation or processing are exempted from this requirement.

Questions?

Visit cannabis.maryland.gov or use the [MCA Policy Question Intake form](#) to submit policy questions related to cannabis regulations, legislation, issued guidance, or licensing. MCA will review submissions and publish an updated FAQ document to the [Laws & Regulations](#) page.