



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 regulatory changes for cannabis businesses. Please consult an attorney if you have any questions regarding the legal requirements that apply.

## COMAR 14.17.01, .02, .05 -.06, .10 -.15, .18 and .21 Regulatory Proposal Summary

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On February 10, 2026, the Maryland Cannabis Administration (MCA) adopted amendments to COMAR 14.17.01, .02, .04 -.06, .10 -.12, .14 -.15, .18 and .21 with nonsubstantive changes and anticipates they will be effective March 16, 2026. The Notice of Proposed Action is printed in 52:23 Md. R. 1127 — 1186 (November 14, 2025). The MCA anticipates the Notice of Final Action to print in the Maryland Register on March 6, 2026. This document identifies regulatory changes that may impact operations for licensees, ancillary businesses, and may affect medical program participants. It is not legal advice. Please consult an attorney if you have any questions regarding the legal requirements that apply.

The amendments include certain new initiatives and policy adjustments in response to industry stakeholders' feedback and MCA subject matter review. Highlighted changes include providing the MCA with a new pilot authority, extending the length of the conditional license period, new and modified definitions of "management agreements" and "residence", new requirements for processors to address failed product tests, limits on the number of licensees able to co-locate on a shared premises, codification of MCA's existing hemp acquisition process, modification to regulations governing visitors to operational premises, clarifying and providing additional flexibility to micro dispensary operations, allowing for walk-up cannabis dispensing, broadening the application of regulatory violations to cannabis agents and conditional licensees, modifying responsible vendor training requirements, and reducing various fees collected by the Administration.

In this action, MCA has also updated citations, corrected minor drafting errors, and made other technical clarifications to align with statute or current policy. These changes are not listed because they do not alter any existing processes and are not anticipated to have any operational impact on industry stakeholders.

**This document is intended to provide guidance to licensees regarding how the MCA's revised regulations differ from [its current regulations](#) and on when new provisions will be enforced or implemented. Implementation dates in **red text** indicate a procedural change that may require operational licensee or registrant action.**

# Regulatory Package: COMAR 14.17 Policy Adjustments & Clarifications

## COMAR 14.17.01 Definitions

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- Residence – MCA is amending the definition of residence to *remove the exclusion on short term rentals, hotels, or hostels occupied for less than 90 days*. **Effective Immediately.**

## COMAR 14.17.02 General Regulations

- Regulation .04 Technical Authority - The MCA is updating this regulation to reflect the most current version of MCA's Technical Authority, in effect since February 2025. **Effective Immediately.**
- Regulation .06 Pilot Authority - This new regulation provides MCA with the authority to require licensees to participate in pilot programs aimed at improving the efficacy of cannabis regulations provided that participants are chosen using an objective criteria, given 60 days notice, and that no documents produced by the licensee during a pilot be used in a compliance case against the licensee. 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. **Effective immediately.**

## COMAR 14.17.05 Application Process and Issuance of Licenses

- Regulation .05 Issuance of a License or Rescission of a Conditional License – The MCA is extending the duration of the conditional license period from 18 months to 24 months in accordance with its [November 4, 2025 bulletin. “Conditional License Extensions”](#). **Effective immediately.**
- The MCA is clarifying that it may suspend, fine, restrict, or revoke a cannabis license, including a conditional license, if a licensee is in violation of §F. **Effective immediately.**

## General Licensee Chapters

### COMAR 14.17.06 Standard Licenses

- Regulation .02 Term of License and License Renewal - The MCA is clarifying that it may specify the manner and format by which all submissions regarding licensure are provided by licensees and conditional licensees. **Effective immediately.**
- Regulation .04 Transfer of Ownership Interest in a License - The MCA is amending this regulation to clarify that it may deny a transfer of interest if a proposed transferee has any tax payments in arrears. Existing language required MCA to deny a transfer in this

case and did not authorize the MCA to consider any factors that might warrant discretion. **Effective immediately.**

- Regulation .05 Management Agreements - The MCA is defining management agreements as an arrangement between a management company and a licensee for the provision of services, including but not limited to consulting, advisory, or marketing services related to the licensee's operations. Management agreements do not include arrangements for legal, financial, or other services that do not delegate operational aspects of the business to the service provider. **Effective immediately.**
- Regulation .11 Licensee Co-location - The MCA is capping the maximum number of licensees that can co-locate on a shared premises at three. **Effective immediately.**

## Licensee- and Registrant-Specific Chapters

### COMAR 14.17.10 Cannabis Grower Operations

- Regulation .07 Visitor to the Premises - The MCA is providing an exemption to certain visitor procedures for emergency services personnel, including firefighters, rescue squad members, law enforcement, or emergency medical services personnel, responding to a call for emergency services. **Effective immediately.**
- Regulation .09 Standard Operating Procedures - MCA is requiring grower licensees to establish decontamination SOPs. **Effective immediately.**

### COMAR 14.17.11 Processors

- Regulation .03 Cannabis Processor Facility Operations - MCA is codifying the [existing hemp acquisition process](#). **Effective immediately.**
- Regulation .04 Cannabis Product Processing - The MCA is codifying corrective and preventative action procedures that processors must follow if cannabis test results indicate the confirmed presence of a pathogen more than once in a sixty day period. These actions include: conducting environmental swab testing as required by MCA's Technical Authority, investigating root causes of contamination, decontaminating areas of operation, reporting to the MCA, updating SOPs, creating a corrective action plan, as well as doing additional testing and implementing additional procedures to prevent further contamination, if required by the Administration. **Effective July 1, 2026.**
- Regulation .17 Visitor to the Premises - The MCA is providing an exemption to certain visitor procedures for emergency services personnel, including firefighters, rescue squad members, law enforcement, or emergency medical services personnel, responding to a call for emergency services. **Effective immediately.**
- Regulation .19 Standard Operating Procedures - MCA is requiring processor licensees to establish decontamination SOPs in alignment with new requirements in proposed COMAR 14.17.11.04E. **Effective immediately.**

### COMAR 14.17.12 Dispensaries

- Regulation .02 Standard Cannabis Dispensary

- The MCA is providing an exemption to certain visitor procedures for emergency services personnel, including firefighters, rescue squad members, law enforcement, or emergency medical services personnel, responding to a call for emergency services. **Effective immediately.**
- The MCA is modifying regulations to allow for walk-up dispensing in a similar fashion as drive-through dispensing of cannabis. **Effective immediately.**
- Regulation .03 Micro Dispensary - MCA is providing additional clarity and flexibility to micro dispensary licensees via the following regulatory changes:
  - Micro dispensaries may store their inventory in up to three storage facilities controlled or operated by the micro dispensary or controlled and operated by another licensee. **Effective immediately.**
  - If a micro dispensary stores inventory in a storage facility controlled and operated by another licensee then: 1) each licensee's inventory must be physically separated and only accessible to the licensee's agents and owners; (2) a micro dispensary must have equal, independent, and unique control over access to its storage area, including the ability to add or remove its badged agents to access any area in which their cannabis or cannabis products are stored; and (3) have equal independent and unique access to its video surveillance recordings. **Effective immediately.**
  - Micro dispensaries are no longer required to monitor video surveillance footage captured from deliveries daily. **Effective immediately.**
  - All cannabis other than what is being packaged or dispensed during a micro dispensary's hours of operation must be kept in their storage facility. **Effective immediately.**
  - Micro dispensary owners must be a registered agent if they work or volunteer in any operational areas of the premises, including delivery vehicles. **Effective immediately.**
  - Micro dispensaries must produce GPS or video surveillance records to the Administration within 48 hours of a request. **Effective immediately.**
  - Aligning requirements for micro dispensaries that apply to other license types, including visitor procedure requirements and making available video surveillance records. **Effective immediately.**
- Regulation .11 Standard Operating Procedures - All dispensaries must establish a Standard Operating Procedure for reviewing GPS activities at a specified regular interval. **Effective immediately.**

## COMAR 14.17.13 Cannabis Products

- Regulation .05 Edible Cannabis Products - The MCA is removing the restriction against the production of high potency liquid edibles, which may now be produced in accordance with 14.17.13.05G. **Effective immediately.**

#### 14.17.14 Complaints, Enforcement, Record Keeping, and Inspections of Cannabis Businesses

- Regulation .04 Discipline and Enforcement - MCA is clarifying that an agent is subject to MCA enforcement actions along with licensees and registrants. **Effective immediately.**

#### 14.17.15 Cannabis Businesses Agents

- Regulation .02 Registration - MCA may now disqualify an individual from registering as a cannabis agent if they had previously had their agent registration revoked or for good cause. **Effective immediately.**
- Regulation .05 Training - Requires agents to complete responsible vendor training (RVT) within 90 days of their employment start date. **Effective immediately.**
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#### COMAR 14.17.21 Fees

- Regulation .02 Fees - The MCA is reducing various fees including cannabis agent registration fees, independent testing laboratory registration and employee registration fees, registrant agent registration fees, research representative registration fees, and edible cannabis product permit fees. **Effective immediately.**