



## **Pathway to Licensure Webinar FAQ**

### **Supplemental Applications and Conditional Licenses**

**If we already submitted our supplemental application, do we still need to submit additional corporate documents later in the process?**

Yes. The supplemental application should be treated as an ongoing submission requirement. If ownership documents change, operating agreements are updated, or new business contracts are executed, those materials should be provided to MCA as they become available. Providing updated documentation promptly helps prevent delays during review.

**How do we know what documents MCA still needs from us after the supplemental application?**

In addition to providing all new contracts as they become available, applicants should maintain communication with their assigned investigator and respond to any follow-up requests. MCA will also provide guidance materials and checklists outlining common document requirements to help licensees confirm they have submitted everything necessary.

**How should we submit new contracts or updated corporate documents to MCA?**

Documents should generally be submitted to the investigator assigned to the application. If the file size is too large or another submission method is required, MCA staff will provide guidance on how to submit the materials.

**Does MCA approve vendor contracts or operating agreements before they take effect?**

MCA reviews submitted contracts as part of the licensure process but generally does not issue separate approval letters for standard vendor contracts or operating



agreements. If issues are identified during review, MCA will notify the applicant. Certain agreements, such as management agreements or co-location agreements, do require MCA approval before they can become effective, and MCA will provide a written decision to applicants who submit these documents for review.

### **Do Management Agreements require approval from the MCA?**

Yes. COMAR 14.17.06.05D requires all management agreements (sometimes called Management Services Agreements or MSAs) be reviewed and approved by the MCA. These agreements are subject to a separate approval process from the license application or standard operational approvals. Licensees must submit the agreement for review before it is implemented to ensure the arrangement does not constitute an invalid transfer of an ownership interest in a license or otherwise violate COMAR 14.17.06.05.

### **How do I submit a management agreement for review?**

To submit a management agreement for review, email it to your assigned investigator. Please allow 60 days.

### **What is a Management Agreement (or Management Services Agreement)?**

MCA's recently adopted regulations define a "management agreement" 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. A management agreement does not include arrangements for legal, financial, or other services that do not delegate operational aspects of the business to the service provider. "Management company" means an entity that provides management services to a licensed entity.

### **When does the financial due diligence review occur in the licensure process?**

Financial due diligence is typically conducted toward the later stages of the pathway as the facility buildout nears completion. MCA's contracted reviewer will contact individuals with ownership interests of five percent or more to schedule interviews and review financial documentation.

## **Inspections**

### **How do I schedule a facility walkthrough during construction?**



Applicants may request an informal walkthrough by contacting the investigator assigned to their application. Walkthroughs provide an opportunity to identify potential compliance issues before the pre-licensing inspection and may help avoid costly corrections later in the buildout process.

### **How long does it take to schedule an inspection after requesting one?**

Scheduling timelines depend on availability and the readiness of the facility. Walkthrough visits may be scheduled relatively quickly when investigators are available. Pre-licensing inspections are typically scheduled after all other requirements have been completed.

### **How should applicants prepare for the pre-licensing inspection?**

Applicants should ensure the facility is operationally ready and compliant with applicable COMAR requirements. This includes functioning security systems, completed SOPs, controlled access areas, and the ability to demonstrate basic operational processes such as inventory tracking.

### **Is the pre-licensing inspection required before final licensure?**

Yes. The pre-licensing inspection is required and serves as the final inspection before a license can be activated.

### **How many inspections should an applicant expect before becoming operational?**

MCA may conduct walkthrough inspections during construction to provide feedback and help applicants prepare for final review. One pre-licensing inspection is required prior to final licensure. After licensure, facilities are subject to ongoing compliance inspections.

## **Delivery and Micro Dispensaries**



**For delivery operations, will MCA inspect both the facility and delivery vehicles?**

If an applicant intends to operate from a physical location and conduct delivery services, MCA must inspect both the facility and the vehicles as part of the readiness review.

## **Agent Badging**

**Do employees need to be badged before walkthrough inspections?**

No. Agent badging generally occurs later in the licensure process, after the pre-licensing inspection, when the license is being prepared for activation.

**How long does the agent badging process take?**

In most cases, the badging process can be completed within ten business days, once all required information is submitted. The most common delays occur when MCA is awaiting criminal history background check results from the agency responsible for processing them.

## **METRC and Operational Systems**

**When can licensees begin METRC training?**

METRC training becomes available as the business approaches the final stages of licensure and agent badging begins. Owners and key personnel may begin onboarding training during the pre-operational readiness stage, and additional training resources remain available once the license is active.

**How will METRC work for micro dispensaries delivering on behalf of a standard dispensary?**

Micro dispensaries operating only as delivery services may use a workflow within



METRC that records deliveries and transactions without maintaining independent inventory. Applicants should communicate their operating model to MCA so the system can be configured appropriately.

## **Operations**

### **Is research and development allowed before a license is active?**

No. Activities involving cannabis or cannabis products may only occur after a license has been issued and operations are active within the regulated system.

### **Can equipment testing or preparation occur before licensure?**

Applicants may prepare their facilities and equipment as part of the buildout process. However, any activity involving cannabis must occur only after licensure and regulatory tracking systems are active.

## **Cultivators and Processors**

### **When should growers submit nutrient management plans or agricultural documentation?**

Cultivators should work with the appropriate agencies to obtain required agricultural approvals and submit documentation to MCA as soon as it becomes available. Missing documentation may delay readiness determinations or inspections.

### **If we plan to manufacture capsules or tablets, are edibles regulations applicable?**

Yes. Cannabis products intended for oral ingestion are regulated as edible cannabis products and must comply with applicable regulations.

## **Communication with MCA**



**What should we do if we cannot reach our assigned investigator?**

Licensees should first follow up with their investigator. If additional assistance is needed, questions may be directed to [licensing.mca@maryland.gov](mailto:licensing.mca@maryland.gov) or the general licensee inquiry form using the QR code below so the inquiry can be reviewed and routed appropriately.

