



Overview of Secure Transportation Registration Processes

Secure Transportation Company Registration Process

Applicable Regulations:

COMAR 10.62.18.01(B)(2): “Secure transportation company” means a business that is registered with the Commission, whose employees are bonded, and that provides highly secure vehicles for the transportation of valuables, and can assure that medical cannabis is secured at all times during transport.

COMAR 10.62.18.07:

- (A) A secure transportation company shall register with the Commission.
- (B) To register, a secure transportation company shall submit:
 - (1) A completed secure transportation company registration form;
 - (2) The name, address, and date of birth and Social Security number of each transportation agent and a copy of the registration form completed by each transportation agent;
 - (3) A security plan, including protocol in case of emergency; and
 - (4) Any secure medical cannabis transport vehicle for inspection by the Commission.
- (C) The registration is valid for 2 years.
- (D) The registration may be renewed by submitting to the Commission:
 - (1) A copy of the secure transportation company registration form;
 - (2) Proof that fingerprints have been submitted to CJIS and the FBI for every transportation agent; and
 - (3) Proof that each secure transport vehicle has been inspected by the Commission.

Registration Process:

- In order to register with the Commission as a secure transportation company, a business must submit the **Ancillary Business Registration Form (linked [here](#))** and select “Secure Transportation Company” as the type of business.
 - Information that a business must report on the Ancillary Business Registration Form includes:
 - Business Name;
 - Business Structure;
 - Business Contact Information;
 - Authorized Contact(s);
 - Proof of incorporation/formation;

- If foreign business entity, proof of registration in Maryland;
 - Proof that business is in good standing;
 - Documentation of ownership structure and profit sharing arrangements;
 - Criminal history; and
 - Financial history.
 - A business must set forth its Business Plan in the Ancillary Business Registration Form.
 - The Business Plan must provide a *detailed* description of:
 - The scope of the business’s proposed secure transport activities;
 - An overview of the business’s operational budget and financial resources;
 - The business’s timeline for initiating operations; and
 - The business’s plan to ensure appropriate employee working conditions, benefits, and training.
 - A business may supplement the Business Plan with any other information or documentation that demonstrates its ability to quickly and successfully enter the market.
 - A business must set forth its Security Plan in the Ancillary Business Registration Form.
 - The Security Plan must demonstrate that the business can assure that medical cannabis is secure at all times during transport through a detailed description of:
 - Standard security protocol;
 - Security protocol during an emergency;
 - How the business will employ technology and other resources to enhance the security of its medical cannabis transportation operations; and
 - Any other relevant information.
 - After a business submits the Ancillary Business Registration Form, Commission Staff reviews the submission to determine whether it is complete.
 - If the submission is complete, the Commission reviews the submission to determine whether it demonstrates that the business satisfies the regulatory requirements for registering as a secure transportation company.
 - Commission Staff contacts the business’s primary contact by email to inform them as to whether the Commission approved its registration. If so, the business proceeds to the Secure Transport Vehicle Registration Process.
- A registered secure transportation company must register its agents with the Commission.
 - Complia is a third-party contractor that executes agent registration.
 - After the Commission approves a secure transportation company’s registration, Complia emails the registered secure transportation company’s primary contact the instructions for registering agents.

Secure Medical Cannabis Transport Vehicle Registration Process

Applicable Regulations:

COMAR 10.62.01(38): “Secure medical cannabis transport vehicle” means a vehicle owned or leased by a licensee or a secure transportation company for the purpose of transporting medical cannabis that:

- (a) Meets the criteria specified in COMAR 10.62.18;
- (b) Is equipped with:
 - (i) A secure area within the body or compartment of the vehicle containing solid or locking metal partitions, cages, or high strength shatterproof acrylic; or
 - (ii) Locked and secure storage containers anchored to the inside of the vehicle;
- (c) Conceals medical cannabis, products containing medical cannabis, or locked and secure storage containers so they are not visible or identifiable from outside of the vehicle; and
- (d) Is registered with the Commission.

COMAR 10.62.18.04(B): A registered grower agent, processor agent, dispensary agent, or transportation agent driving a secure medical cannabis transport vehicle shall have a current driver’s license.

COMAR 10.62.18.05:

- (A) Either a secure transportation company or a licensed grower, processor, or dispensary shall transport products containing medical cannabis.
- (B) A secure transportation company or a licensed grower, processor, or dispensary shall comply with all of the following:
 - (1) Each secure medical cannabis transport vehicle shall be operated with at least one registered grower, processor, dispensary, or transportation agent; and
 - (2) All medical cannabis shall be transported in one or more locked and secure storage containers and may not be accessible while in transit.

Registration Process:

- In order to transport products containing medical cannabis, a registered secure transportation company or licensee must submit the **Secure Medical Cannabis Transport Vehicle Registration Form** ([linked here](#)).
- Information that the registered secure transportation company or licensee must report on the Secure Medical Cannabis Transport Vehicle Registration Form includes:
 - VIN number;
 - Proof that the vehicle is registered in the name of the registering business;
 - Proof that the vehicle is insured;

- Photographs of the vehicle, including the secure area or compartment where medical cannabis would be stored; and
 - A *detailed* description of how the security features of the vehicle satisfy COMAR 10.62.01(38) (b) and (c).
- After the registered secure transportation company or licensee submits the Secure Medical Cannabis Transport Vehicle Registration Form, Commission Staff reviews the submission to determine whether it demonstrates that the vehicle(s) identified therein meet the applicable regulatory requirements. Commission Staff then contacts the primary contact for the business or licensee by email to inform them as to whether the vehicle registration has been approved.