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Maryland Medical Cannabis Commission

Larry Hogan, Governor • Boyd Rutherford, Lt. Governor • Robert Neall, Secretary

BULLETIN: 2018 – 008

Licensee Guidance for Processing Agent Identification Cards

Linthicum, MD (original April 26, 2018) (amended June 11, 2019) – The Maryland Medical Cannabis Commission (the Commission) is providing this bulletin to guide licensees on the proper procedures for processing agent identification cards, entering agents into Complia, and obtaining agent identification cards. This guidance applies to all employees or volunteers of a licensed grower, processor, or dispensary.

New Agent Application

An agent must be registered with the Commission and obtain an agent badge before volunteering or working for a licensee

Submission Requirement

Licensed entities may begin to submit the prospective agent information stated below no sooner than 14 business days prior to entering the agent’s information into Complia to volunteer or work for the licensee. This ensures the Commission receives accurate and up-to-date information from the agent, as required by COMAR 10.62. Required agent information includes (1) a State and FBI criminal history record check, including fingerprints (copy of receipt/confirmation may be uploaded), and (2) a drug screen (results may be uploaded). These documents should be dated no more than 14 business days from the date the prospective agent was entered into Complia.

Temporary Agent Badge

Temporary Agent badges are emailed to the licensee’s point of contact upon approval by the Commission. Permanent Agent badges are printed every Friday and mailed out the following week. Agent Badges must be obtained and displayed from the agents first day at work. No agent is permitted to work under a ‘visitor’ badge.

Drug Screen

Drug screen results indicating a “DILUTED” sample will not be accepted. A prospective agent shall submit to additional drug screen(s) until the sample is appropriate and accepted by the testing facility.

Prospective agents possessing an out-of-state medical cannabis certification, including Washington, D.C., with a positive test for cannabis, shall provide to the Commission valid patient registration identification. Valid documentation may be uploaded in the section requiring a picture of the agent’s valid photo identification.

Prospective agents with a positive drug screen for a prescription medication shall submit documentation supporting medical justification. Valid documentation may be uploaded (in one image) in the section requiring a picture of the agent's valid photo identification.

Photo Requirement

The agent picture shall conform to the following requirements:

- Clear, color photograph of the head and shoulders;
- Sized to 2 x 2 inches, with dimensions in a square aspect ratio;
- Taken within the last six months;
- Taken in full-face view, directly facing the camera, with nothing obscuring the face (e.g. hat or sunglasses);
- Taken with a neutral facial expression (preferred) or a natural smile, with both eyes open; and
- Photo may not be digitally enhanced or altered to change the agent's appearance in any way.

Agent Departure/Termination

As soon as possible upon termination or departure, the licensee shall:

1. Take custody of the agent's identification card;
2. Obtain keys or other entry devices from the agent;
3. Ensure the agent can no longer access the licensee's premises;
4. Within one (1) business day of the agent's termination or departure notify the Bureau of Enforcement and Compliance (BEC) at metrcnotifications.mmcc@maryland.gov. The email should include:
 - Email **Subject:** Agent Departure
 - Business License Name and License Number
 - Agent Name and License Number;
 - Date of termination/departure
 - Specific circumstances of termination/departure; and
 - Whether the agent returned their identification card (Note: failure to return an identification card to the Commission within 30 days of termination will result in notice being sent to the Maryland State Police).
5. Initiate immediate delivery of the agent's identification card to:
Maryland Medical Cannabis Commission
Attn: Agent Badge Return
849 International Drive, Suite 450
Linthicum, Maryland 21090

Agent Renewal & expired Badge Return

Once an agent is renewed in Complia and the permanent new agent badge is received, the expired badge must be returned, please indicate the reason for return (i.e. Renewal written on it) when being returned to

the MMCC. All returned agent badges received with no clear guidance will be INACTIVATED in Complia.

Replacement Identification Card

A replacement agent identification card requested for any reason is subject to a \$100 fee.

Change in Business Name

Within five (5) business days of receiving approval from the Commission to change its business name, the licensee must apply for new agent identification cards under the new business name and pay the applicable replacement identification card fee.

Questions

All questions concerning Complia and the agent registration process should be directed to Myesha McQueen, Office Manager myesha.mcqueen@maryland.gov. The Commission requests that licensees wait at least ten (10) business days following submission of a prospective agent's registration to contact the Commission concerning registration status.

Security Personnel Identification Card

Guidance for registering a licensed security guard company and personnel directly employed by a licensee will be forthcoming in a future bulletin.

This bulletin does not change, remove, or replace any existing regulations under COMAR 10.62.

Joy A. Strand, MHA
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