



BULLETIN: 2020 – 008
Effective Date: March 17, 2020

Licensee Social Distancing Requirements

Linthicum, MD — The Maryland Medical Cannabis Commission (the “Commission”) is providing this bulletin to clarify permissible operational practices at licensed facilities during the COVID-19 pandemic. The Commission previously issued [Bulletin 2020-005](#), [Bulletin 2020-006](#) and [Bulletin 2020-007](#) to advise licensees, agents, patients, caregiver, and providers on regulatory requirements and operational best practices.

Reasonable Suspicion of a Risk to the Public Health

In the event that a Commission inspector has a “reasonable suspicion of conditions that create a risk to the public health,” COMAR 10.62.33.06 authorizes the inspector to (1) suspend the distribution of some or all medical cannabis from the licensed premises (2) order immediate evacuation of the premises and seal the entry door, or (3) quarantine some or all medical cannabis.

In light of the state of emergency and catastrophic health emergency proclaimed by Governor Hogan on March 5, 2020, and various emergency orders issued to reduce the spread of COVID-19, the Commission is notifying all licensees that failure to maintain the below conditions will constitute a risk to the public health under COMAR 10.62.33.06.

1. **Maintain social distancing.** Licensees must implement practices and procedures designed to enable all individuals—agents, patients and caregivers—to maintain a distance of approximately six feet from others while on the licensed premises. In particular, the number of individuals allowed access to any dispensary waiting area or service area should be limited to the number of individuals who can safely maintain the required distance between individuals in the space available.
2. **Clean and disinfect frequently touched surfaces, including tables, doorknobs, light switches, handles, desks, toilets, faucets, and sinks.** Licensees should maintain an accurate log recording the cleaning of equipment.
3. **No deli-style sales.**
4. **No sniff jars.**

Patient Attestation Suspended Until Further Notice

COMAR 10.62.30.05 requires a patient or caregiver to complete an attestation. The Commission is hereby suspending the patient and caregiver attestation requirement until further notice.

Please direct any questions to enforcement.mmcc@maryland.gov.