



BULLETIN: 2021 – 010
Effective Date: November 15, 2021

Effective Date of Regulatory Changes

Linthicum, MD – On November 5, 2021, the Notice of Final Action for several Maryland Medical Cannabis Commission (MMCC) regulatory provisions was published in the Maryland Register. This bulletin outlines changes to COMAR 10.62 that may impact licensees.

Calculation of Reporting Period

- **License Renewals:** The period required for a medical cannabis licensee to report the renewal of its license has changed from at least “30 business days” to “30 calendar days” before the license expires; and
- **Discrepancies in Shipment:** The period for completing an investigation, amending SOPs, and reporting to MMCC any discrepancies in the shipment of medical cannabis products, now must be calculated based upon the number of “calendar days” instead of “business days” specified in COMAR.

Licensee Quarterly Reporting Requirements

Licensees are no longer required to submit a quarterly report to the MMCC with a list of medical cannabis products and their specifications that the licensee offered for distribution.

Modification of Premises

All major modifications or renovations of a licensed premise must now be approved by the MMCC in accordance with the following process:

- *Prior to making major renovations or modifications to a licensed premise*, a licensee must submit a request to the MMCC.
 - A renovation or modification is considered “major” if a building or other permit(s) is required to complete the project.
- Commission members will review the proposed renovation/modification and approve or deny.
- If approved, the licensee may commence the renovation/modification.
- Once complete, the licensee must pass a post-construction inspection to ensure the renovation/modification conforms to the approved plan and all relevant COMAR provisions.

Drive-Through Dispensing

Pursuant to COMAR 10.62.27.10, prior to commencing drive-through dispensing, a licensee must:

- Establish MMCC-approved standard operating procedures that ensure the safety and security of patients and caregivers, dispensary agents, and the medical cannabis products; and
- Pass a pre-operation inspection.

Deli-Style Sales

The MMCC is delaying enforcement of the provisions impacting deli-style sales until February 13, 2022 (90 days from effective date of November 15, 2021) to allow adequate time for all licensees to come into compliance.

Beginning February 13, 2022, licensees may re-initiate the [previously suspended practice of deli-style sales](#). Pursuant to COMAR 10.62.30.09, **prior to re-initiating deli-style sales, a licensee must:**

- Establish MMCC-approved standard operating procedures addressing all aspects of deli-style sales;
- Ensure scales and equipment conform to the standards established by the Maryland Department of Agriculture's "[Guidelines for Purchasing a Scale to be Used in Direct Sale Application](#):" and
- Pass a pre-operation inspection to ensure the sales will occur in accordance with the requirements of COMAR.

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