



March 4, 2026

The Honorable Kriselda Valderrama
Chair, House Economic Matters Committee
230 Taylor House Office Building
Annapolis, Maryland 21401

HB0622 – Cannabis – Licensees – Micro Dispensary Employees and Cannabis Agent Training Programs

FAVORABLE WITH AMENDMENTS

Dear Chair Valderrama, Vice Chair Charkoudian, and Members of the House Economic Matters Committee,

I am writing on behalf of the Maryland Cannabis Administration (MCA) in SUPPORT with amendments of HB 622 – Cannabis – Licensees – Micro Dispensary Employees and Cannabis Agent Training Programs.

MCA is grateful to the Chair for her leadership in sponsoring this departmental. HB 622 makes targeted statutory improvements that are technical in nature and enhance workforce flexibility, strengthen compliance tools, and allow the Administration to modernize cannabis agent training in a manner that is responsive to public health and regulatory needs. Additionally, after discussions regarding cannabis delivery with both standard and micro dispensaries, MCA would like to introduce an amendment to HB 622 that would amend the Cannabis Reform Act to close potential gaps in delivery access for patients.

Delivery Amendment

MCA has been in discussion with both standard dispensaries that are currently providing delivery and micro dispensaries preparing to begin operations. Of the five micro dispensaries that report they expect to be open by May 1, they will not immediately be able to cover the patients currently served by standard dispensaries. Furthermore, patients in more rural areas, such as Cecil and Harford Counties, may experience diminished access, as businesses with limited drivers are likely to concentrate deliveries in more densely populated areas. Although MCA has the authority to permit micro dispensaries to expand their delivery regions, such action may not alleviate patient access concerns in the short-term.

MCA recommends adding the language below to *Alcoholic Beverages and Cannabis § 36-401* that allows the Administration to permit standard dispensaries to continue delivering medical cannabis to high-risk areas while micro dispensaries become operational:

J. THE ADMINISTRATION MAY PERMIT A STANDARD DISPENSARY LICENSEE THAT DELIVERS MEDICAL CANNABIS IN A LOW MARKET DENSITY AREA, AS DEMONSTRATED BY THE SEED-TO-SALE TRACKING SYSTEM, TO CONTINUE DELIVERING MEDICAL CANNABIS FOR A PERIOD OF TIME DETERMINED BY THE ADMINISTRATION.



The proposed language appropriately authorizes MCA to determine the length of the transition period. Under this framework, even after micro dispensaries become operational, MCA would retain the discretion to allow a standard dispensary to continue delivery services in areas where patient access concerns persist.

MCA recommends the use of the term “low market density area,” to be defined by the Administration through regulation or guidance. One potential definition would be a license award region with fewer than two fully licensed micro dispensaries. Providing MCA with the authority to define this term ensures that the designation can be data-driven and responsive to evolving market conditions.

This approach affords MCA the flexibility necessary to monitor dispensaries’ capacity to deliver medical cannabis to all patients in need and to authorize a targeted transition period during which standard dispensaries may continue serving high-risk or underserved areas. Importantly, this tailored strategy avoids a blanket extension of delivery authority that could undermine micro dispensaries’ ability to establish themselves and capture market share, while still protecting patient access where it is most at risk.

As introduced, HB 622 increases the employment cap for micro dispensaries from 10 to 20 employees. Pursuant to Alcoholic Beverages and Cannabis §36–401, as of July 1, 2026, the incoming micro dispensary licenses will be solely responsible for medical and adult-use cannabis retail delivery to consumers around the State. MCA is only permitted to issue 10 of these licenses. MCA selected 10 applicants in its first adult-use licensing round, with 8 applicants having matriculated to conditional licensure. Micro dispensary licensees are currently statutorily restricted to a maximum of 10 employees—meaning just 80 employees across the State will be available to ensure these businesses’ regulatory compliance and day-to-day operations, as well as to meet demand for all medical and adult-use cannabis deliveries effective July 1, 2026.

In the summer of 2025, MCA held listening sessions with micro dispensaries who shared concerns that this delivery capacity may not meet demand and increases the risk that consumers will turn to the illicit market for cannabis deliveries. In sharing these concerns, MCA requests increasing the employment cap for micro dispensaries from 10 to 20 employees. As Maryland’s regulated market continues to mature and micro dispensaries grow the delivery market, increasing the employee cap:

- Supports adequate staffing for compliance, security, and inventory control functions;
- Improves patient and consumer service capacity;
- Allows small businesses to scale responsibly while remaining subject to all regulatory oversight requirements.

This adjustment does not diminish compliance standards or oversight authority; rather, it ensures that micro dispensaries can meet those standards effectively.

HB 622 makes important revisions to the Responsible Vendor Training framework by altering the program name to Cannabis Agent Training and removing certain mandatory statutory components



that are overly specific to dispensary operations. Per Alcoholic Beverages and Cannabis §36–1001, all registered employees (badged agents) of a cannabis licensee are statutorily required to annually complete what is currently called a Responsible Vendor Training (RVT) program. The purpose of RVT is to ensure all cannabis workers are trained on critical aspects of their jobs, as well as Maryland laws and regulations impacting their work, helping ensure licensee compliance and the safety of medical cannabis patients, adult-use consumers, and cannabis agents. However, the majority of the required course components delineated in statute pertain to point-of-sale requirements that are not relevant to grower and processor employees. This imposes an undue burden on cannabis growers and processors whose employees must pay for and complete an RVT course despite its irrelevance to their license type. Further, as currently codified, the MCA is unable to dictate critical annual workplace safety or production control training for grower and processor employees.

Should HB 622 pass, MCA will adopt regulations establishing mandatory training components that approved Cannabis Agent Training providers must include in their curricula to ensure training is effective, relevant, and adaptable. This approach ensures that:

- Training remains meaningful for all license types;
- The Administration can update requirements as compliance risks evolve;
- Core public health and safety standards remain central to workforce preparation.

Under the regulatory framework MCA intends to implement, cannabis agent training will include license-specific content such as:

Growers

- Inventory controls, including timely and accurate METRC data entry;
- Equipment sanitation, calibration accuracy, and maintenance logs;
- Batch release controls;
- Grower agent safety best practices.

Processors

- Controls for manufacturing cannabis concentrates and infused products;
- Sanitary storage of medical cannabis;
- Storage of ingredients and edible cannabis products;
- Safety protocols for edible cannabis product processing.

Grower & Processor License Types

- Employee sampling policies;
- Visitor procedures;
- Compliance with Standard Operating Procedures (SOPs);
- Inventory controls and METRC data accuracy;
- Procedures for receiving materials.



Dispensaries

Training will remain similar to current requirements, with flexibility to emphasize pertinent compliance topics, including:

- Acceptable forms of identification, including patient and caregiver identification cards;
- Patient allotment lookup procedures;
- Sales limits (personal use amounts and medical product reservations);
- Statutory and regulatory requirements related to cannabis sale, transfer, and delivery.

This framework ensures that cannabis agents receive training tailored to their operational responsibilities, while preserving MCA's ability to refine requirements over time as industry practices and compliance trends evolve.

House Bill 622 represents a practical and forward-looking improvement to Maryland's cannabis regulatory framework. By increasing micro dispensary staffing flexibility and modernizing cannabis agent training requirements, the bill strengthens compliance, enhances public health safeguards, and supports a professional, well-trained workforce.

For these reasons, the Maryland Cannabis Administration respectfully requests the Committee to issue a favorable report and looks forward to continued collaboration with the General Assembly to ensure Maryland's cannabis market remains safe, equitable, and well-regulated. Should the Committee have any questions or concerns, please contact me at Tabatha.Robinson@maryland.gov, or Selena Rawlley, Deputy Chief of Legislative Affairs, at Selena.Rawlley@maryland.gov.

Sincerely,

Tabatha Robinson, Director
Maryland Cannabis Administration