



March 25, 2026

The Honorable Pam Beidle
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, Maryland 21401

HB0622 – Cannabis – Licensees – Dispensary Licenses, Micro Dispensary Employees, and Cannabis Agent Training Programs
FAVORABLE

Dear Chair Beidle, Vice Chair Hayes, and Members of the Committee,

I am writing on behalf of the Maryland Cannabis Administration (MCA) in SUPPORT of HB 622 – Cannabis – Licensees – Dispensary Licenses, Micro Dispensary Employees, and Cannabis Agent Training Programs as amended by the House.

HB 622 makes several 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. The bill also reflects a collaborative partnership between MCA and industry stakeholders to amend HB 622 in a way that aligns with shared goals and supports a balanced, effective regulatory framework.

Delivery Amendment

MCA has engaged in discussions with both standard dispensaries currently providing delivery services and micro dispensaries preparing to begin delivery operations. Five of eight micro dispensary conditional licensees report they expect to be operational by May 1. However, it is plausible that they will not initially have the capacity to fully serve the patients currently receiving delivery from standard dispensaries. Furthermore, patients in more rural areas may experience reduced access, as businesses with limited delivery staff are more likely to concentrate their services in densely populated areas. This challenge is particularly acute in Maryland’s eastern region. To ensure patient access across the state, MCA worked with the House to amend HB 622 to extend the current delivery sunset from July 1, 2026 to July 1, 2027. This extension would allow standard dispensaries and registrants currently engaged in delivery operations to continue delivering to medical patients until July 1, 2027, helping to prevent potential gaps in patient access. Micro dispensaries, once operational, are currently permitted to deliver to both adult-use consumers and medical patients.

Micro Dispensary Registered Cannabis Agent Cap Increase

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 cannabis agents – meaning just 80 employees (badged agents) 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. As Maryland’s regulated market continues to mature and micro dispensaries grow the delivery market, increasing the employment 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.

As introduced, HB 622 increased the micro dispensary employee cap from 10 to 20 “employees.” However, industry stakeholders requested that the term “employees” be replaced with “registered cannabis agents” to ensure consistency with existing statutory language and MCA regulations, and to clarify that only badged agents are counted toward the employment cap for micro dispensaries. MCA currently interprets the statute in this manner and therefore agreed to this change as a clarifying amendment intended to align the language with current regulatory practice.

Improvements to the Responsible Vendor Training Program

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.

Furthermore, industry stakeholders requested that the annual Responsible Vendor Training requirement be extended to occur every three to four years. However, the cannabis industry remains a developing and rapidly evolving sector, with new policies, processes, and information emerging regularly. As such, MCA believes it is both prudent and consistent with the intent of the legislature to require ongoing and relatively frequent training for licensees and their employees to support public health and safety. For example, just four years ago, Maryland operated only a medical cannabis program; since the launch of adult-use, the industry has undergone significant regulatory, operational, and market changes.

Simultaneously, MCA recognizes that an annual training requirement may present operational challenges for certain social equity licensees as they begin establishing and scaling their businesses. Accordingly, MCA agreed to amend § 36-501(f) to extend the training requirement from annually to "at least once every two years."

House Bill 622 represents a practical and forward-looking improvement to Maryland's cannabis regulatory framework. By extending the delivery sunset, increasing micro dispensary staffing flexibility, and modernizing cannabis agent training requirements, the bill maintains patient access, 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 on HB 622 as amended 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