Cannabis Control Commission
COMMONWEALTH OF MASSACHUSETTS

11/22/26 Public Meeting - Cannabis Control Commission Public Meeting - Additional Materials

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Chapter 65 Fall Regulatory Round Policy Discussion

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To: Cannabis Control Commission
From: Anthony Ivan Wilson, Commissioner
Date: November 5, 2026
Re: Amendment to the agent registration proposal

This memorandum amends the proposal to restructure the agent registration ("badging") system that I presented to the Commission on September 24, 2026. It first summarizes that proposal, then sets out amendments responding to the Commission's discussion at its October 21, 2026 public meeting. The final sections compare Massachusetts with jurisdictions that do not require state-issued employee badges and identify the individuals who would remain subject to registration with the Commission.

Summary of the proposed two-tier registration system

1. **Persons Having Direct or Indirect Control, Controlling Persons and Executives**. All are subject to the suitability standard in 935 CMR 500.801, and the Commission may deny or revoke their registration.
2. **Employees.** Employees do not register. The licensee notifies the Commission of these employees, and no suitability check applies.

Proposed amendment

1. Modify 935 CMR 500.032 to allow the Commission to order a licensee to terminate an employee based on the employee's conduct at a licensed establishment that violates the Commission's regulations. The employee shall be notified and allowed an opportunity to dispute the order.
2. A copy of the employee register to be maintained at the physical location of the licensee, available for inspection by Commission staff.

Other jurisdictions with No State Issued Badging Requirement

California (4 CCR § 15043)
All agents, officers, or other persons acting for or employed by a licensee conducting retail sales or participating in a temporary cannabis event shall display a laminated or plastic-coated identification badge **issued by the licensee** at all times while engaging in commercial cannabis activity. The identification badge shall, at a minimum, include the licensee's "doing business as" name and license number, the employee's first name, an employee number exclusively assigned to that employee

for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.

Michigan: No badging requirement.

New Mexico (16.8.2.10(K) NMAC)
Licensees shall issue a laminated or plastic-coated identification badge to all agents, officers, or other persons acting for or employed by a licensee, which shall, at a minimum, include the licensee's "doing business as" name and license number, the individual's first name, an employee number exclusively assigned to that employee for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1 inch in width and 1.5 inches in height.

New York: No badging requirement.

Washington (WAC 314-55-083(1))
Display of identification badge. All licensees and employees on the licensed premises shall be required to hold and properly display an identification badge **issued by the licensed employer** at all times while on the licensed premises and engaged in the transportation of cannabis. The identification badge must list the licensee's trade name and include the person's full and legal name and photograph. All licensees and employees must have their state issued identification available to verify the information on their badge is correct.

Below is a list of individuals that will have to register and pass suitability as defined in section 500.002

Close Associate means a Person who holds a relevant financial interest in, or is entitled to exercise power in, the business of an applicant or Licensee and, by virtue of that interest or power, is able to exercise a significant influence over the management or operation of a \ Marijuana Establishment, a Medical Marijuana Establishment or Independent Testing Laboratory licensed under 935 CMR 500.000 or 935 CMR 501.000: Medical Use of Marijuana. A Close Associate is deemed to be a Person or Entity Having Direct or Indirect

Control. A Hospitality On-site Consumption Licensee may contract with a Non-Cannabis Entity to operate within the Non-Cannabis Entity's physical space and the Non-Cannabis Entity shall not be considered a Close Associate by virtue of this relationship alone. A Marijuana Event Organizer Licensee may contract with a Non-Cannabis Entity to operate within the Non-Cannabis Entity's physical space and the Non-Cannabis Entity shall not be considered a Close Associate by virtue of this relationship alone.

Controlling Person means an officer, board member or other individual who has a financial or voting interest of 10% or greater in a Marijuana Establishment or Medical Marijuana Establishment. Designation as a Controlling Person under this definition shall not, by itself, constitute a determination that the individual exercises direct or indirect control of a Marijuana Establishment or Medical Marijuana Establishment.

Executive means members of the board of directors, executive officers, executive director, manager, or their equivalent, of a Marijuana Establishment, Medical Marijuana Establishment, or Independent Testing Laboratory.

Owner means any Equity Holder that possesses, individually or in the aggregate, 20% equity or greater in a Marijuana Establishment, a Medical Marijuana Establishment or an Independent Testing Laboratory.

Person or Entity Having Direct Control means any Person or entity having direct control over the operations of a Marijuana Establishment, which satisfies one or more of the following criteria:

(a) An Owner;

(b) A Person or entity that possesses a voting interest, individually or in the aggregate, of 20% or greater in a Marijuana Establishment or Medical Marijuana Establishment, or a right to veto significant events;

(c) A Close Associate;

(d) A Person or entity that has or exercises the right, power, or authority to control, through an agreement, contract, or otherwise, including, but not limited to the ability to:

1. Make decisions regarding operations, strategic planning, financial decisions, capital allocations, acquisitions, or divestments;
2. Appoint or remove directors or their equivalent that is greater than the Person's or entity's voting interest, or that exceeds the rights or authority granted to such Person or entity by agreement, contract, or other governing instrument;

3. Appoint or remove Corporate-level officers or their equivalent; or
4. Earn 20% or more of the profits or collect more than 20% of the dividends.

(e) A Court Appointee or assignee pursuant to an agreement for a general assignment or Assignment for the Benefit of Creditors; or

(f) A Third-party Technology Platform Provider that possesses any financial interest in a Delivery Licensee including, but not limited to, a Delivery Agreement or other agreement for services.

Person or Entity Having Direct and Indirect Control means a Person or Entity Having Direct Control and a Person or Entity Having Indirect Control.

Person or Entity Having Direct or Indirect Control means a Person or Entity Having Direct Control or a Person or Entity Having Indirect Control.

Person or Entity Having Indirect Control means any Person or entity having indirect control over operations of a Marijuana Establishment. It specifically includes any Person or Entity Having Direct Control over a holding or parent company of the applicant, the chief executive officer and executive director of those companies, or any person or entity in a position to control the decision-making of a Marijuana Establishment indirectly. A Hospitality On-site Consumption Licensee may contract with a Non-Cannabis Entity to operate within the Non-Cannabis Entity and the Non-Cannabis Entity shall not be considered a Person or Entity Having Indirect Control by virtue of this relationship alone. A Marijuana Event Organizer Licensee may contract with a Non-Cannabis Entity to operate within the Non-Cannabis Entity's physical space and the Non-Cannabis Entity shall not be considered a Person or Entity Having Indirect Control by virtue of this relationship alone.

500.030: Registration of Marijuana Establishment Agents

(1) A Marijuana Establishment shall apply for registration for prior to a person becoming a Persons Having Direct or Indirect Control, Controlling Persons and Executives as Marijuana Establishment Agents.

(2) The registration of a Marijuana Establishment Agent shall include:

(a) The full name, date of birth, and address of the individual;

(b) All aliases used previously or currently in use by the individual, including maiden name, if any;

(c) A copy of the applicant's driver's license, government issued identification card, liquor purchase identification card issued pursuant to M.G.L. c. 138, § 34B, or other verifiable identity document acceptable to the Commission;

(d) An attestation that the individual will not engage in the Diversion or Inversion of Marijuana or Marijuana Products;

(e) Written acknowledgment by the applicant of any limitations on his or her authorization to cultivate, harvest, prepare, package, possess, transport, and dispense Marijuana in the Commonwealth;

(f) Any other information required by the Commission.

(3) The failure to register an individual as a Marijuana Establishment Agent as required by section 500.030(1) will subject the Marijuana Establishment to fines defined in section 500.360 and Suspension, Revocation and Denial of Renewal Applications as defined in section 500.450.

(4) A Marijuana Establishment shall notify the Commission no more than thirty days after a Marijuana Establishment Agent ceases to be associated with the establishment.

(5) Agents shall be subject to the suitability standards of Licensure in 500.801. Provided that agent must undergo the background check required under 500.801 unless such a background check has been completed pursuant to licensure.

500.031: Disclosure of Marijuana Establishment Employee Roster

(1) A Marijuana Establishment shall provide the Commission with a list of all employees. The list shall be provided to the Commission no more than thirty (30) days after an individual joins or leaves employment with a Marijuana Establishment.

(2) The list shall include the following information for each employee:

a. Full name

b. date of birth

c. an attestation that the employee has not been convicted of an offense involving the distribution of a controlled substance, including marijuana, to a minor.

d. A unique employee identification number issued by the Marijuana Establishment

(3) The failure to provide the information required by section 500.031(1) will subject the Marijuana Establishment to fines defined in section 500.360 and Suspension, Revocation and Denial of Renewal Applications as defined in section 500.450.

(4) Upon the renewal of its license, the Marijuana Establishment shall certify that all of its employee have not been convicted of an offense involving the distribution of a controlled substance, including marijuana, to a minor.

(5) A marijuana establishment shall issue an identification badge to each of its employees. The identification badge shall meet specifications required by the Commission.

Modify section "500.032: Revocation of a Marijuana Establishment Agent Registration Card" to allow commission to order termination of employees and add notice and hearing process. Keep ability to revoke registration for agents.

Repeal section 500.033: Void Registration Cards.

Repeal section 500.802: Suitability Standard for Registration as a Marijuana Establishment Agent.

Agent Registration Modernization

DRAFT - Internal Policy Memorandum, 10.29.2026
Prepared by: Commissioner Xiomara Albán DeLobato

Executive summary

The Commission's consideration of agent badging reform presents an opportunity to reduce recurring hiring costs, improve administrative efficiency, and strengthen the long-term competitiveness of Massachusetts' cannabis industry. Commissioner Wilson's proposal has prompted a substantive and constructive examination of how the current agent registration framework can better support business vitality while preserving essential regulatory safeguards related to individual accountability, suitability, workforce transparency, and enforcement.

This alternative framework seeks to advance the Commission's shared objectives through the Chair's **SEETS principles: Safe, Equitable, Efficient, Transparent, and Sustainable**. It recognizes that reducing financial and administrative burdens on licensees and maintaining effective regulatory oversight are complementary objectives. The approach offers a pathway toward immediate cost relief while supporting the development of modern, adaptable workforce and registration infrastructure capable of evolving alongside the industry.

The framework presents four interconnected considerations:

1. **Policy Rationale and Regulatory Safeguards**: Evaluate the potential implications of repealing existing agent-specific provisions, particularly those related to individual accountability, ownership and control transparency, suitability, and proportionate enforcement.
2. **Long-Term Modernization**: Explore a centralized, self-service agent registration portal that supports portable digital identification, streamlined employer onboarding, regulatory oversight, and workforce development through potential integration with EquityWorks.
3. **Near-Term Cost Relief**: Assess replacing physical badges with permanent digital credentials using existing Commission processes while evaluating the financial and operational feasibility of eliminating the $115 agent registration fee.
4. **Implementation and Fiscal Sustainability**: Utilize the existing Chapter 65 agent badging working group to evaluate regulatory requirements, enforcement protections, technology readiness, workforce development opportunities, and a sustainable funding strategy.

The purpose of this memorandum is to inform continued policy development, identify areas requiring further assessment, and outline a practical alternative that advances cost relief without unnecessarily diminishing the Commission's regulatory capabilities.

I. Policy Rationale and Decision Context

A. Business Vitality and Regulatory Accountability (shared objective)

The cost of registering and onboarding agents represents a recurring financial and administrative burden for Massachusetts cannabis businesses, particularly those experiencing frequent employee turnover. Feedback received through public meetings and discussions with industry operators has consistently identified registration costs and administrative requirements as central concerns. These expenses can be especially challenging for smaller operators with limited financial flexibility. Commissioner Wilson's proposal appropriately raises the need to reassess existing requirements and identify opportunities to reduce costs, improve efficiency, and support the industry's long-term economic vitality.

At the same time, agents are an integral component of the industry's operational infrastructure, participating across cultivation, product manufacturing, transportation, testing, retail, and emerging license categories. Agent registration reform should therefore consider both immediate financial relief and the development of a workforce infrastructure capable of supporting the industry's continued evolution.

The Commission's September 2026 public discussion identified two potential approaches: an employee roster model that would replace routine individual registration with licensee reporting and an agent-centric portable registration model that would retain individual accountability. This memorandum explores an alternative that builds upon these objectives while maintaining the Commission's essential regulatory capabilities.[1]

B. Preserving Individual Accountability, Suitability, and Regulatory Transparency

Agents perform functions directly connected to public health and safety, including responsible cultivation practices, safe product handling, and assisting patients and consumers within the scope of their regulated responsibilities. The proposed repeal of 935 CMR 500.032, 500.033, and 500.802 warrants careful consideration beyond the administrative and financial implications of physical agent badges. These provisions serve distinct regulatory functions related to individual accountability, employment authorization, suitability, and enforcement.[2] [3]

Individual agent registration establishes a direct regulatory relationship between the Commission and employees, supporting individual accountability independent of enforcement against licensees. Under M.G.L. c. 94G, § 4(a)(xiii), the Commission's authority to impose fines extends to individuals who are licensed, registered, found suitable, or approved for licensure. Eliminating individual agent registration for employees who do not otherwise qualify under these categories could therefore limit the Commission's ability to impose direct financial penalties for individual misconduct, increasing reliance on establishment-level enforcement.

- *935 CMR 500.032 – Revocation of a Marijuana Establishment Agent Registration Card.*
  This provision establishes grounds for revocation of individual agent registration, including certain violations of cannabis laws and regulations. Recent amendments strengthen the Commission's ability to address ownership and control transparency by establishing additional grounds for action involving:
  - Failure to disclose direct or indirect control or controlling-person status.
  - Misrepresentation of de facto control or authority over a marijuana establishment.
  - Exercise of control or authority disproportionate to an individual's equity or voting interest or beyond the rights established through governing agreements.

  These protections are particularly relevant as Massachusetts implements updated ownership and license concentration provisions under Chapter 65 of the Acts of 2026. The statutory exception involving equity interests below 20% does not independently eliminate oversight of individuals exercising direct or indirect control. Likewise, the regulatory definition of a controlling person incorporates separate disclosure considerations, including certain interests at or above 10%.

  Importantly, individuals with ownership interests below these thresholds may still exercise significant control through management arrangements, financial agreements, contractual rights, or other mechanisms. Thus, maintaining the ability to identify and address undisclosed or misrepresented authority is essential to regulatory transparency and the integrity of the Commonwealth's licensing structure.

  Potential repeal consequence: Elimination of 500.032 without equivalent replacement authority could remove an express registration-based mechanism for addressing individual misconduct, including diversion, inversion, and conduct involving undisclosed or misrepresented control.

- *935 CMR 500.033 – Void registration cards.*
  This provision addresses circumstances in which an agent's registration card becomes void, including termination of the individual's association with a licensed establishment.

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[1] CCC, *"Seeks Informal Public Input on Agent Registration Requirements,"* Sept. 28, 2026. https://masscannabiscontrol.com/2026/09/cannabis-control-commission-seeks-informal-public-input-on-agent-registration-requirements/

[2] 935 CMR 500.000, *adult use*, effective Sept. 11, 2026 (especially §§ 500.005, .030, .032, .033, .802). https://masscannabiscontrol.com/wp-content/uploads/2026/09/20260911-935-CMR-500.000.pdf

[3] 935 CMR 501.000, *medical use*, effective Sept. 11, 2026 (corresponding agent registration and suitability provisions). https://masscannabiscontrol.com/wp-content/uploads/2026/09/20260911-935-CMR-501.000.pdf

Although the existing language is tied to physical cards and employer-specific registration, the underlying regulatory function remains important: maintaining accurate information regarding an individual's authorization to participate in regulated activities. A digital registration system should preserve timely updates to employment affiliations, registration status, and any applicable restrictions.

Potential repeal consequence: Repeal without replacement could create gaps in the Commission's ability to maintain accurate, current records of employment authorization and registration status.

- *935 CMR 500.802 – Suitability Standard for Registration as a Marijuana Establishment Agent.* This provision establishes agent-specific suitability standards and associated regulatory responsibilities. While individuals with ownership or control interests remain subject to applicable licensure suitability standards under 935 CMR 500.801, the repeal of 500.802 without replacement would remove the existing suitability framework specifically applicable to Marijuana Establishment Agents. Any changes must remain consistent with statutory protections governing employment eligibility and criminal history.

  Potential repeal consequence: Repeal without an appropriate replacement framework could reduce individual-level suitability oversight and create uncertainty regarding continuing eligibility, monitoring, and enforcement responsibilities.

Equity Implications of Shifting Enforcement Responsibility

Eliminating direct individual enforcement mechanisms could increase reliance on establishment-level enforcement, even when misconduct is primarily attributable to an individual agent. For example, diversion or theft may occur despite an establishment maintaining documented training, security protocols, and reasonable supervision. While licensees remain responsible for their own regulatory obligations, enforcement responses should distinguish between institutional compliance failures and independently attributable individual misconduct. This concern also extends to circumstances involving coercion, undisclosed influence, or other misconduct in which a licensee may itself be adversely affected by an individual's actions.

The financial consequences of establishment-level enforcement, including penalties, legal expenses, corrective actions, and operational disruptions, may affect businesses differently depending on their financial capacity. This presents an important **equity consideration** for smaller and independently operated establishments, which may have fewer resources available to absorb unexpected regulatory costs.

Preliminary information provided by commission staff indicates that approximately **34 agent registration related Notices of Deficiency** over the preceding year provides a useful baseline for assessing current compliance activity and informing modernization.

Preserving the substantive protections associated with 935 CMR 500.032, 500.033, and 500.802 is essential to maintaining safety, equity, and transparency within the Commission's regulatory framework. Modernization should retain these safeguards while reducing unnecessary administrative and financial burdens on business establishments.

C. Federal Policy Uncertainty and Regulatory Resilience

Federal cannabis policy continues to evolve, with important distinctions between medical and adult-use cannabis and ongoing uncertainty regarding broader federal scheduling and regulatory requirements.[4] [5]

Recent federal developments illustrate the potential for changes in compliance expectations, oversight responsibilities, and the relationship between state-regulated cannabis markets and federal requirements.

Although future federal action cannot be assumed to require Massachusetts to retain its existing agent registration structure, eliminating established regulatory capabilities before determining their long-term necessity could limit the

[4] U.S. Department of Justice, *Medical Marijuana Scheduling Announcement,* April 23, 2026. https://www.justice.gov/opa/pr/justice-department-places-fda-approved-marijuana-products-and-products-containing-marijuana

[5] Drug Enforcement Administration, *Marijuana Rescheduling Regulatory Actions*, accessed October 29, 2026. https://www.dea.gov/marijuana-rescheduling-regulatory-actions

Commission's flexibility to respond to changing requirements. Maintaining reliable agent identification, suitability records, regulatory audit trails, and enforceable authorization statuses would allow the Commission to adapt its oversight processes as the legal and operational environment change.

The objective is not to preserve physical badges or unnecessary administrative requirements; instead, to retain the regulatory capabilities necessary to protect public safety, preserve accountability, and support compliance as federal and state policies evolve.

D. Workforce challenges extend beyond agent badging

High employee turnover and frequent movement between establishments have resulted in financial and operational challenges that extend beyond the agent registration process.

Potential contributing factors include compensation, scheduling, career advancement opportunities, management practices, training access, and the availability of industry-recognized credentials. Reducing registration costs can provide immediate relief, but a sustainable workforce strategy should also address the conditions that influence employee retention, professional development, and long-term participation.

While workforce development extends beyond the Commission's statutory and regulatory responsibilities, partnerships with stakeholders, such as community colleges, workforce development boards, industry employers, and training organizations could support the development of transferable credentials and career pathways across the cannabis supply chain.

Such programs could establish more consistent professional standards, support advancement into higher-skilled positions, and strengthen the industry's talent pipeline. The Commission's role would be to explore opportunities for coordination, data-informed planning, and partnerships consistent with the Commission’s statutory responsibilities and available resources.

II. Long-Term Vision: Portable Agent Registration and Integrated Workforce Infrastructure

The long-term vision is to establish a centralized, self-service agent registration portal within the Commission's technology infrastructure. Modeled after the new medical patient portal, this approach would allow prospective agents to register directly with the Commission and receive a unique, permanent identifier that follows them throughout their careers in the Massachusetts cannabis industry, regardless of employer, position, or license type.

The proposed model would fundamentally modernize how agents enter and move within the regulated workforce while preserving individual registration, applicable suitability requirements, and the Commission's enforcement authority. It would also reduce duplicative administrative processes and provide a scalable foundation for future industry growth.

Importantly, initial registration would not constitute authorization to work or a suitability determination. Employment authorization would remain contingent upon an employer initiating the required onboarding process and completion of applicable regulatory reviews.

Proposed Registration and Employment Workflow

1. **Individual Registration:** A prospective agent creates a secure account, submits required identifying information, and receives a unique registration identifier, Individual Identification Number (IIN).
2. **Employer Initiation:** Upon selecting a candidate, a licensee submits the individual's IIN and required employment information through the Commission's system, which is expected to reduce administrative work by the licensee.
3. **Required Verification:** The licensee completes applicable CORI and background check requirements. Commission staff review the necessary information and conduct applicable suitability determinations consistent with existing legal requirements.
4. **Employment Authorization:** Following completion of required reviews, the individual's status becomes active and is associated with the employing establishment and applicable licenses.

5. **Portable Registration:** The individual retains the same IIN when transitioning between employers, positions, or license types. Employment affiliations and any required additional reviews are recorded without duplicating the individual's underlying registration record.
6. **Ongoing Regulatory Oversight:** The system maintains current authorization statuses, employment affiliations, and applicable regulatory restrictions, supporting Commission oversight and enforcement across participating establishments.

Workforce Development and EquityWorks Integration

The proposed portal presents an opportunity to connect regulatory modernization with workforce development. Through potential integration with the existing EquityWorks Career Hub, agents could voluntarily make professional profiles available to prospective employers, explore employment opportunities, and access relevant training and career advancement resources.[6]

This functionality could support more efficient recruitment while helping businesses access a broader pool of qualified candidates across the cannabis supply chain. It could also strengthen the Commission's ability to collect reliable workforce demographic and employment data, supporting statutory research responsibilities and a better understanding of industry participation and workforce mobility.

Any integration should maintain appropriate separation between voluntary career information and confidential regulatory records, including criminal history, suitability, and enforcement information.

Technology Readiness and Long-Term Sustainability

Existing Commission technology may provide a foundation for this model, subject to further assessment by the Chief Technology and Innovation Officer (CTIO) and relevant staff. As the Commission evaluates future IT investments and potential supplemental funding, the development of an agent portal should be considered within a broader technology strategy that prioritizes interoperability, security, operational efficiency, and adaptability.

The system should be capable of accommodating changing workforce demands, emerging license categories, and future regulatory requirements without requiring repeated structural redesign. Input from Commissioners and operational staff would help establish the functional requirements and long-term technology priorities necessary to support a sustainable regulatory environment.

Where legally and operationally feasible, the long-term model should support a consistent registration experience across adult-use and medical operations, reducing unnecessary duplication for agents, licensees, and Commission staff.

Financial and Operational Considerations

The cost of onboarding agents extends beyond the $115 registration fee. Background checks, CORI-related processing, and repeated onboarding requirements can create substantial expenses for businesses experiencing frequent employee turnover.

The existing Chapter 65 agent badging working group, in coordination with the Chief Financial and Administrative Officer (CFAO), should assess actual onboarding costs, opportunities to reduce duplicative processing, and the legal feasibility of reusing qualifying background-check information across employers and license types. This assessment should also establish a sustainable financial model for the proposed infrastructure, including development, staffing, cybersecurity, maintenance, and future expansion. Potential workforce training resources and Commission technology funding should be evaluated separately.

Ultimately, the proposed long-term model would establish a portable, centralized registration system that reduces administrative duplication, supports workforce mobility, and preserves the Commission's ability to maintain reliable regulatory oversight as the industry evolves.

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[6] CCC, *EquityWorks Career Hub*, accessed October 29, 2026. https://masscannabiscontrol.com/equity/equityworks/

III. Short-Term Solution: Immediate Cost Relief Through Digital Registration

As an immediate measure, the Commission could eliminate physical agent badges and the associated $115 registration fee while preserving the existing licensee-led registration process, suitability requirements, and enforcement safeguards under 935 CMR 500.032, 500.033, and 500.802 until a long-term solution is implemented.

The Commission already issues temporary digital registration credentials in PDF format before agents receive their physical cards. This existing process demonstrates the potential to transition to permanent digital credentials using current infrastructure, with appropriate updates to credential language and regulatory requirements, without fundamentally changing the current registration and verification framework (see Appendix A).

Under this approach, licensees would continue submitting agent information through the existing system, and Commission staff would maintain applicable verification and suitability responsibilities. Upon approval, agents would receive a permanent digital credential in place of a physical badge, with a mechanism for verifying current registration and employment authorization status.

This transition could reduce administrative processing, physical production, and distribution costs while providing immediate financial relief to licensees. It would also maintain the Commission's existing regulatory safeguards and workforce information necessary to support oversight and research.

Financial and Operational Considerations

The proposed elimination of the $115 registration fee requires an assessment of the Commission's current revenue, administrative expenses, and long-term funding needs. The CFAO should evaluate the fiscal impact of fee elimination, potential operational savings from discontinuing physical badges, and available funding mechanisms to sustain registration services.

The existing $115 fee is established under 935 CMR 500.005 as a registration fee rather than solely a physical badge production fee. Its elimination would therefore require appropriate regulatory and fiscal review. General Counsel should also confirm the scope of the proposed fee elimination, including its application to laboratory agents and medical-use registration requirements, with the intent to establish consistency across all programs.

IV. Final Considerations and Recommended Path Forward

The Commission has an opportunity to provide meaningful and timely financial relief to cannabis businesses without compromising the regulatory safeguards that support public safety, equity, and transparency.

The short-term digital registration solution warrants immediate consideration. Replacing physical agent badges with permanent digital credentials and pursuing elimination of the $115 registration fee would directly address a central concern raised by industry stakeholders while preserving the existing registration, suitability, and enforcement framework.

Simultaneously, the established Chapter 65 Agent Badging Working Group should continue evaluating the long-term vision for a centralized, portable agent registration portal. This assessment should consider technology readiness, workforce integration, operational efficiencies, regulatory requirements, and fiscal sustainability.

Advancing these efforts in parallel would allow the Commission to pursue near-term cost relief while thoughtfully developing the infrastructure necessary to support an evolving cannabis industry. The objective is to modernize how the Commission regulates without diminishing its ability to regulate effectively.

Appendix A: Existing Temporary Agent Registration Credential (PDF Example)



Restor

Temporary Agent Registration Card

Registered Agent: [redacted]
Registration Number: [redacted]

Name of Marijuana Establishment: [redacted]
Marijuana Establishment License Number: [redacted]
Type of Marijuana Establishment: Marijuana Retailer

Registration Approval Date: 11-03-2026
Registration Expiration Date: 02-01-2027

This document will serve as your temporary agent registration card. A Marijuana Establishment Agent must carry this temporary registration card associated with the appropriate Marijuana Establishment at all times while in possession of marijuana products, including at all times while at the establishment or while transporting marijuana products. 935 CMR 500.029(8) and 935 CMR 500.030(7). A Marijuana Establishment Agent must also carry a government-issued photo I.D. at all times they are required to carry this temporary registration card.

This temporary registration card will expire and no longer be valid 90 days from the approval date listed above. You should receive your "hard copy" registered agent identification badge prior to the expiration of this temporary registration card. Your "hard copy" registration card will expire one year from the approval date listed above and will need to be renewed by the Marijuana Establishment.

Your Industry Identification Number (IIN) required for METRC access will be available within the next 24 hours. You can retrieve your IIN by going into your approved agent application in MassCIP.

Temporary Agent Registration Card

Olivia Koval
Director of Licensing
Massachusetts Cannabis Control Commission

Figure A1. Example of the Commission's existing temporary digital agent registration credential, illustrating an available format that could be adapted to replace physical badges.