



Title: PETITION FOR ADOPTION OF ADMINISTRATIVE RULES

Submitted pursuant to RCW 34.05.330

Date: August 13, 2026

To: Washington State Liquor and Cannabis Board

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Authority: RCW 34.05.330; RCW 69.50.342; RCW 69.50.375; Chapter 69.51A RCW

Introduction

The Cannabis Alliance petitions the Washington State Liquor and Cannabis Board to adopt the administrative rules described in this petition pursuant to RCW 34.05.330. Each proposed rule is designed to be adopted through Board rulemaking without legislative action. The Board is requested to respond within 60 days of receipt as required by RCW 34.05.330(3).

Proposed Rules**1. Medical Cannabis Participation Verification****Subject of Rule**

A mechanism for documenting and verifying existing state-authorized medical cannabis activities conducted pursuant to chapters 69.50 RCW and 69.51A RCW. Proposed as WAC 314-55-XXX under WAC 314-55.

Why the Rule Is Needed

Washington operates an integrated medical and adult-use cannabis market that includes medical endorsements for retailers, Department of Health product standards for producers and processors, certified medical cannabis consultants, and a recognition

card and authorization database for qualifying patients. Despite this framework, no current rule establishes a process for LCB to document or verify a licensee's regulatory status and activities relating to medical cannabis under Washington law.

This gap has practical consequences. For example, a Washington cannabis business seeking federal registration may need to document the activities it is licensed to conduct under state law; a researcher seeking federal authorization to conduct cannabis research may need documentation regarding the regulatory status of a Washington licensee supplying cannabis or cannabis products; and a financial institution or insurer conducting due diligence may need reliable confirmation of a licensee's state regulatory status. A licensee seeking rights, protections, registrations, or other benefits available under federal law may likewise need official state documentation establishing the scope of activities authorized under Washington law. In each circumstance, the underlying information exists within Washington's regulatory framework, but there is currently no standardized process for obtaining official verification of that information from the Board.

The proposed rule addresses this administrative gap without altering federal eligibility requirements or creating a new state license category or endorsement. Its purpose is not to respond to any particular federal event, but to improve the documentation and administration of Washington's existing medical cannabis framework, making the system legible to the licensees, patients, regulators, researchers, and institutions that depend on it. As federal cannabis law evolves, the legal significance of a licensee's state-authorized activities may change. A standardized verification process would provide Washington licensees with accurate, state-issued documentation of their regulatory status while leaving determinations regarding the federal legal significance of that status to the appropriate federal agency.

People and Groups Affected

- Cannabis retailers holding medical cannabis endorsements under RCW 69.50.375;
- Licensed cannabis producers and processors engaged in activities relating to cannabis products regulated under chapter 69.51A RCW and chapter 246-70 WAC;
- Qualifying patients and designated providers;
- Certified medical cannabis consultants employed or contracted by endorsed retailers;
- Federal agencies, financial institutions, insurers, and researchers seeking verified information about Washington licensee status; and
- The Washington State Department of Health.

Rulemaking Authority

The proposed rule falls within the Board's existing authority under RCW 69.50.342, RCW 69.50.375, and chapter 69.51A RCW. No legislative action is required. The rule establishes administrative procedures — verification processes, documentation formats,

response protocols — within the Board's existing authority to manage its licensing records and respond to lawful inquiries.

Suggested WAC Language — WAC 314-55-XXX

WAC 314-55-XXX Medical Cannabis Participation Verification

(1) Purpose. The purpose of this rule is not to create a new category of cannabis license or endorsement, but to provide a mechanism for documenting and verifying existing state-authorized medical cannabis activities conducted pursuant to chapters 69.50 RCW and 69.51A RCW. The board shall establish a process by which licensed cannabis businesses may request verification of their regulatory status and activities authorized under chapters 69.50 RCW and 69.51A RCW for use in governmental, regulatory, financial, research, insurance, litigation, or other lawful purposes, including federal registration processes.

(2) Designation of Verification Coordinator. The board shall designate one or more existing employees to administer this section and shall identify a primary point of contact for verification requests. Administration of this section shall be assigned as part of the designated employee's existing duties and shall not require the creation of a new position or organizational unit. The designated employee or employees shall be responsible for:

- (a) Receiving and responding to verification requests submitted under this section;
- (b) Responding to inquiries from federal agencies and other governmental entities regarding verification of Washington cannabis licensees;
- (c) Coordinating, when necessary, with the Washington State Department of Health regarding information maintained by each agency relating to medical cannabis activities under Washington law;
- (d) Maintaining records of verification requests and the board's responses in accordance with applicable records retention requirements; and
- (e) Coordinating the issuance of Medical Cannabis Verification Certificates under this section.

The board shall publish on its website the name or office, telephone number, email address, and other appropriate contact information for the primary point of contact designated under this section and shall update that information within five business days of any change.

(3) Mandatory Verification. Upon written request by a licensee, or by a federal agency acting with the written authorization of the licensee, the board shall verify information contained in its licensing and endorsement records regarding the

licensee's regulatory status and activities authorized under chapters 69.50 RCW and 69.51A RCW. Unless otherwise requested, the board shall satisfy this requirement by issuing a Medical Cannabis Verification Certificate under subsection (4) of this section or other written verification based upon the board's official records.

(4) Medical Cannabis Verification Certificate. Upon written request by a licensee, the board shall issue a Medical Cannabis Verification Certificate verifying information contained in the board's official licensing and endorsement records regarding the licensee's regulatory status and activities authorized under chapters 69.50 RCW and 69.51A RCW. Issuance of a certificate under this section does not create a new license category or endorsement. The certificate shall be based solely on information contained in the board's official records and shall not constitute a determination of eligibility for any federal program or compliance with federal law.

(a) The certificate shall identify, as applicable to the licensee's license type:

(i) the licensee's name, license number, license type, and period of licensure;

(ii) for retailers, as applicable:

(A) that the retailer holds a valid medical cannabis endorsement issued under RCW 69.50.375;

(B) that the retailer is authorized under Washington law to sell cannabis and cannabis products to qualifying patients and designated providers;

(C) that the retailer employs or contracts with certified medical cannabis consultants, as required by law; and

(D) that the retailer participates in the medical cannabis authorization database and recognition card system established under chapter 69.51A RCW;

(iii) for producers, as applicable:

(A) that the producer holds a valid producer license issued under chapter 69.50 RCW;

(B) that the producer is authorized to engage in producer activities under Washington law with respect to cannabis products regulated under chapter 69.51A RCW and chapter 246-70 WAC;

(C) that the producer may transfer cannabis to licensed processors and medically endorsed retailers as provided by Washington law;

(iv) for processors, as applicable:

(A) that the processor holds a valid processor license issued under chapter 69.50 RCW;

- (B) that the processor is authorized to engage in processor activities under Washington law with respect to cannabis products regulated under chapter 69.51A RCW and chapter 246-70 WAC;
 - (C) that the processor may transfer such products to medically endorsed retailers as provided by Washington law;
 - (v) any other endorsements, certifications, or regulatory designations maintained in the board's official records that are relevant to the licensee's medical cannabis activities under Washington law; and
 - (vi) any additional factual information contained in the board's official licensing and endorsement records that the board determines is reasonably necessary to verify the licensee's regulatory status under Washington law.
 - (b) The certificate shall be signed by the Verification Coordinator or the coordinator's designee and shall include the date of issuance.
 - (c) The board shall issue the certificate, or provide a written denial stating the specific grounds for denial and identifying the procedure for administrative review, within fifteen business days after receiving a complete request.
 - (d) A certificate issued under this section shall remain valid for one year from the date of issuance unless the underlying license, medical cannabis endorsement, or other information reflected in the certificate is suspended, revoked, expired, or otherwise materially modified. If such a change occurs before the certificate expires, the board shall notify the licensee within five business days.
- (5) Appeal of Denial. A licensee whose request for a certificate is denied may appeal the denial to the board within thirty days of the denial notice. The board shall issue a written decision on the appeal within thirty days of receiving it. Nothing in this section limits a licensee's rights under chapter 34.05 RCW.
- (6) Department of Health Coordination. The board shall coordinate with the Washington State Department of Health when necessary to verify information maintained by each agency relating to medical cannabis activities under Washington law.
- (7) Limitation. Nothing in this section:
- (a) requires the board to determine whether a licensee qualifies for any federal program;
 - (b) constitutes an endorsement by the board of any federal registration program or requirement;
 - (c) represents that a licensee is in compliance with federal law; or

(d) waives the board's enforcement authority under state law.

Certification and Submission

The undersigned hereby petitions the Washington State Liquor and Cannabis Board to initiate rulemaking to adopt the rules described in this petition, or such portions thereof as the Board determines appropriate, pursuant to RCW 34.05.330 and the Board's authority under chapter 69.50 RCW and chapter 69.51A RCW.

The Board is requested to respond in writing within 60 days of receipt of this petition, as required by RCW 34.05.330(3), indicating whether it will initiate rulemaking and, if not, the reasons for the denial.