



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**
Division of Cannabis Regulation



**PATH TO COMPLIANCE GUIDE:
Corrective actions and expectations**

August 2026

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Introduction

Article XIV of the Missouri Constitution and the department's rules outline the requirements for safe and compliant operations within Missouri's regulated cannabis industry. This guide provides licensees with an overview of the Division of Cannabis Regulation's (DCR) violation and disciplinary process. It is intended to answer frequently asked questions, explain how DCR identifies and addresses violations, and describe the types of actions and penalties that may occur.

This guide is for informational purposes only and does not create new requirements on licensees or the department, or replace the need for department approval where applicable. All licensees are responsible for understanding and complying with the final requirements outlined in Article XIV and 19 CSR 100-1.

Licensees may find additional information and references at the links below:

- [Article XIV, Section 1.](#)
- [Article XIV, Section 2.](#)
- [19 CSR 100-1.](#)
- [Facility communications and guidance webpage.](#)

Violation of Rule

A violation of rule is when a licensee does not comply with a rule requirement. Under Article XIV and 19 CSR 100-1, DCR has the authority to take corrective action or impose penalties when there is a violation, including limiting or restricting operations, imposing fines, suspending a license, or revoking a license altogether. The purpose of penalties and notices of violation is to encourage rule compliance.

DCR can also issue immediate orders to suspend all or part of a licensee's operations, including placing an administrative hold on marijuana product, if there's a credible and imminent threat to public safety.

As provided in rule, a credible and imminent threat to public safety includes, but is not limited to:

- A dangerous condition at the facility that is likely to harm employees or the public.
- A credible report, such as from law enforcement, that diversion or inversion of marijuana product is occurring at the licensed facility.
- A credible report that a facility's practices are permitting marijuana products to enter the regulated market without being compliantly tested.

Designated Contact

DCR sends notices to the licensee's Designated Contact (DC) using the email address listed in the Missouri online registry. Generally, notices are provided as a letter attached to an email. Notices are considered received on the date they are sent to the DC email. It is very important that facilities keep their DC email address up to date.

Timeframes

Unless otherwise specified in rule or in a notice issued by DCR, all timeframes are measured in calendar days. Deadlines begin on the day following the action, event, or date of issuance referenced in the notice.

Administrative Hearing Commission

The Administrative Hearing Commission (AHC) is an independent administrative tribunal responsible for reviewing disputes between state agencies and affected parties, including licensees. A licensee may seek AHC review of any penalty imposed by DCR.

A complaint to the AHC must be filed within 30 days from the date the department's decision is sent to the licensee. Per rule, complaints submitted after the 30-day deadline will not be considered.

For additional information, please visit [AHC – Administrative Hearing Commission](#)

Street Address:

United States Post Office Bldg.
Third Floor
131 West High Street
Jefferson City, MO 65101

Email: AHC@oa.mo.gov

Mailing Address:

P.O. Box 1557
Jefferson City, MO 65102-1557

Telephone: (573) 751-2422

Fax: (573) 751-5018

Violations

Educational Warnings, Initial Notices of Violation (INOVs), and Final Notices of Violation (FNOVs) notify licensees of non-compliance and often require the licensee to take corrective action.

Educational Warning

If DCR identifies a violation of rule, it may issue an Educational Warning. An Educational Warning is not required before an INOV is issued. When issued, the licensee is usually expected to come into compliance within 15 days.

Educational Warnings are sent in the body of an email rather than as an attached letter.

Purpose: To help licensees address minor compliance issues by identifying the violation.

The notice includes:

- A description of the compliance concern.

Initial Notice of Violation

If DCR determines that a violation of rule has occurred, it may issue an INOV. Licensees have 15 days to complete all requested remedial actions and must provide a written response to DCR documenting the corrective measures taken. A licensee may request additional time before the deadline.

Purpose: To formally communicate the violation and outline the corrective steps required to return to compliance.

The notice includes:

- The rule authority supporting the issuance of the INOV.
- A description of how the licensee violated rule.
- All remedial actions expected of the licensee and the associated deadlines.
- Instructions for submitting the written response.

If DCR determines that the licensee has completed the requested remedial actions, it will issue a letter confirming that the INOV has been satisfied.

Final Notice of Violation

Following an INOV, DCR may issue an FNOV if violations persist or if requested remedial actions were not completed. If the violations are not corrected within 30 days of the FNOV, the licensee may be subject to penalties, including suspension or fines. The licensee must submit a written response to DCR documenting the actions taken to address the violation.

Purpose: To notify the licensee that violations identified in an INOV remain unresolved and to provide a final opportunity to correct them before penalties may be imposed.

The notice includes:

- A statement of the violation.
- The remedial actions required of the licensee and the associated deadlines.
- Instructions for submitting the written response.

If DCR determines that the licensee has completed the requested remedial actions, it will issue a notice confirming that the FNOV has been satisfied.

Violation Terms

Repeat Violations

If a licensee receives INOVs for more than three separate rules, or more than one INOV for the same rule within a rolling 12-month period, DCR may require the licensee to take additional corrective steps. These may include:

- Obtaining accreditation or certification for a quality management system (QMS), and/or
- Undergoing a third-party audit.

Both the QMS provider and the third-party auditor are selected by DCR, and all associated costs are the responsibility of the licensee.

Remedial Actions

Remedial actions are the steps a licensee must take to correct a violation and return to compliance. While DCR may identify the minimum corrective actions required, it is the licensee's responsibility to ensure full compliance with all applicable rule requirements.

Satisfied Letter

A satisfied letter is a notice from DCR to the Licensee confirming that the required remedial actions were successfully completed.

Withdrawal of a Notice

A licensee may submit a written rebuttal to an INOV explaining why there is no violation. If submitted in a timely manner, DCR will review the written rebuttal and withdraw the INOV upon a determination that it should not have been issued.

Extension

A licensee may request additional time to respond or to fulfill a remedial action prior to the expiration of the respective deadline, which may be granted or denied.

Penalties

DCR may impose penalties when a licensee fails to comply with applicable rules or when violations pose a risk to public health or safety. Penalties vary in severity depending on the nature, scope, and impact of the violation and may include administrative holds, fines, suspension, nonrenewal, or revocation of a license.

If DCR identifies a credible and imminent threat to health or public safety, it may issue an immediate order to suspend operations and/or place an administrative hold on marijuana product.

Licensees may appeal penalties to the AHC.

Examples of violations that may lead to restriction/suspension/revocation:

- Ownership disputes that impair the operations of the facility or Department review of an application (19 CSR 100-1.070(1)(H)).
- Loss of control of approved location, facility or license (19 CSR 100-1.100(4)(F)).
- Failure to report required information (19 CSR 100-1.100(6)).
- Testing or sampling violation, including manipulation or interference (19 CSR 100-1.110(6)(H)).
- Failure to comply with the statewide track and trace requirements, including intentional misuse or falsification of tracking data (19 CSR 100-1.130(2)(E)2).

Limitations or Restrictions

DCR may limit or restrict activities that would otherwise be permitted under a license. These limitations may apply to broad operational areas—such as purchasing, possessing, producing, selling, or distributing marijuana—or to specific activities, such as creating pre-rolls or infusing products.

When a limitation or restriction is issued, any affected product must remain in place and may not be moved or altered until DCR lifts the restriction in writing. The notice will explain the basis for the limitation, describe the specific prohibited activities, and may be included in

another notice, such as an INOV.

Purpose: To notify the licensee that certain activities are restricted due to a rule violation or compliance concern.

The notice includes:

- A statement of the violation.
- Limitations or restrictions on the license.
- Any exceptions to the limitation or restriction, if applicable.

Fines

DCR may impose fines when a licensee violates rule. Fines may be assessed for each day the violations continue. The issuance or payment of a fine does not bar further penalties or investigation. The amount of the fine is determined by a number of factors and specific circumstances such as: the minimum fine amount for a specific violation in rule, the average daily gross receipts of the facility, the seriousness of the violation, and whether there have been repeated violations.

Purpose: To impose a financial penalty for violations to encourage future compliance.

The notice includes:

- A statement of violation.
- The total fine amount and applicable deadlines for payment.
- Instructions for remitting payment.

Specific maximums outlined in rule:

- Up to \$5,000 per day for failure to provide documents or records requested within the required timeframe (19 CSR 100-1.030(2)(B)3.A).
- Up to \$10,000 for failure to report required information (19 CSR 100-1.100(6)).
- Up to \$50,000 for failure to comply with the statewide track-and-trace requirements, or for each intentional misuse or falsification of track-and-trace data 19 CSR 100-1.130(2)(E)2.).
- Up to \$100,000 for failure to comply with testing or sampling requirements, or for sample manipulation (19 CSR 100-1.110(6)(H)).

Suspension

A suspension may be appropriate for serious or repeated violations. When a license is suspended, the licensee must immediately cease all licensed operations, secure all marijuana products, and may not enter the facility unless DCR authorizes access. During the suspension period, the licensee must continue to comply with all applicable requirements in 19 CSR 100-1, including facility security requirements, such as video monitoring and access controls.

During suspension, a licensee is prohibited from transferring or accepting marijuana products, conducting marijuana related operations, and entering information into the statewide track and trace system.

Before a suspension takes effect, DCR will issue a Notice of Pending Suspension (NOPS) at least 30 days prior to issuing a Notice of Suspension (NOS). If there is a credible and imminent threat to public safety, the suspension may take effect sooner.

Purpose: To require the licensee to cease all activities under the license and maintain compliance with all applicable rules until the suspension is lifted.

The NOPS includes:

- A statement of violation.
- An opportunity for the licensee to cure the deficiencies, which may include an opportunity to provide a written response with supporting documentation.
- Instructions for submitting the response and any required materials.

If DCR determines that the licensee has adequately addressed the deficiencies, it will issue a notice confirming that the NOPS has been satisfied. If deficiencies remain, DCR will issue an immediate suspension order.

If DCR discovers additional violations, an amended NOPS will be issued, and the licensee will receive a new 30-day cure opportunity unless a public health or public safety risk exists, in which case the suspension may be immediate.

The NOS includes:

- A statement of violation.
- An order requiring all operations under the license to cease immediately, including specific actions the licensee must take to comply.
- Ongoing expectations for compliance with all applicable rules during the suspension period.
- An opportunity for the licensee to cure the deficiencies, which may include an opportunity to provide a written rebuttal with supporting documentation.
- Information regarding the right to seek review before the AHC.
- Instructions on how to surrender the license.

Upon issuance of a suspension, DCR staff will be onsite at the licensed facility to ensure all operations stop immediately. A suspension remains in effect until all deficiencies are corrected, any identified threat is resolved, or the license is surrendered or revoked.

Revocation

Revocation is the most severe penalty and may be necessary for repeated or serious violations. When a license is revoked, the licensee and facility are no longer authorized to possess marijuana product or engage in any marijuana related activity. Unauthorized possession following revocation may constitute a criminal violation under Missouri law (e.g., §579.020, RSMo).

Licensees will receive a Notice of Pending Revocation (NOPR) at least 30 days before issuance of a Notice of Revocation (NOR). If there is a credible and imminent threat to public safety, the revocation may take effect sooner.

Purpose: To formally remove the licensee's authority to participate in Missouri's regulated cannabis industry.

The NOPR includes:

- A statement of violation.
- An opportunity to discuss the NOPR with DCR staff via call.
- An opportunity for the licensee to cure the deficiencies, which may include an opportunity to provide a written rebuttal with supporting documentation.
- Instructions for submitting the response and any required materials.

If DCR determines that the licensee has adequately addressed the deficiencies, it will issue a notice confirming that the NOPR has been satisfied. If deficiencies remain, DCR will issue an order revoking the license immediately.

If DCR discovers new violations to support revocation, an amended NOPR may be issued, and the licensee will receive a new 30-day cure opportunity unless a public health or public safety risk exists in which case the revocation may be immediate.

The NOR includes:

- A statement of violation.
- A statement of revocation with applicable effective dates.
- An order requiring all operations to cease and specifying all actions the licensee must take to comply.
- Information regarding the right to seek review before the AHC.

Upon issuance of a revocation, DCR staff will be on site at the licensee's facility to ensure all operations stop immediately. Once revoked, the entity and its facility may not possess or engage in any activity involving marijuana product. Unauthorized possession of a controlled substance may subject individuals to criminal violations under §579.020, RSMo.

Other Notices

Notice of Investigation

Where appropriate and as required by rule, DCR will issue a licensee a Notice of Investigation (NOI) upon the initiation of an investigation of the licensee's compliance with its regulatory requirements. A NOI instructs a licensee to preserve all records related to the subject of an investigation, including video footage, access logs, and any other relevant materials. These records must be maintained at the licensee's expense until DCR confirms that the investigation has concluded. Failure to preserve required records or to respond appropriately may result in penalties.

A NOI is sent in the body of an email rather than as an attached letter.

Purpose: To inform the licensee that an investigation has begun and to initiate record preservation requirements.

The notice includes:

- The rule authority supporting issuance of the notice.
- All required actions the licensee must take and associated deadlines.
- Instructions for submitting any required responses or documentation.

Notice of Administrative Hold

DCR may place an administrative hold on marijuana product to prevent further activity involving the product until compliance concerns are resolved. An administrative hold prohibits all movement or handling of the affected product, including sale, transfer, or disposal. Products subject to a hold must remain quarantined and may not be altered or accessed unless and until the administrative hold is lifted.

A Notice of Administrative Hold is often tied to a recall event, as licensees are notified of administrative holds through the statewide track and trace system.

Purpose: To prevent any activity involving specific marijuana product while DCR evaluates compliance issues or investigates potential risks.

The notice includes:

- The rule authority supporting issuance of the notice.
- A description of why the marijuana product has been placed on administrative hold.
- All required actions the licensee must take and associated deadlines.

Conclusion

This guide was developed to support licensees by offering technical assistance, outlining expectations, and providing clear guidance on corrective actions. It does not change, modify, supplement or supplant the law and rules applicable to licensees. Licensees can find additional information, updates, and guidance on [our website](#).

Compliance is an ongoing obligation. Licensees are expected to remain informed of current requirements, maintain accurate records, correct violations promptly, and respond to DCR notices within required timeframes. Understanding how notices function, what they require, and how to respond supports a compliant and well-regulated cannabis industry.

For questions related to a specific notice, reference the DCR email listed in that notice.