The Virginia License Readiness Checklist

Work through this before February 1, 2027. Check items off as you go, and keep it with your application file.

FLOW CHART

From application to license, step by step

The process the statute sets out. The lottery only happens when more qualified applicants apply than there are licenses, which is likely for retail stores.

1

File the application

Sworn statement plus the nonrefundable application fee. One application per license type.

Once the CCA opens a licensing period

2

Background checks

Every applicant, officer, director and principal (5% owners and managers). A past marijuana conviction alone cannot disqualify you.

3

Labor peace attestation

Signed by you and a bona fide labor organization. Without it the application is denied.

4

Fix any deficiencies

Answer the CCA's requests for information.

10 calendar days

?

More qualified applicants than licenses?

Yes: lottery

An impartial random drawing. Impact applicants are drawn first. If you are not picked, your application stays on file for one year at no new fee.

No

Every qualified applicant moves ahead.

5

Preliminary approval

Now you supply the site, the locality, an updated security plan and any VDACS inspection.

18 months, one 6-month extension

6

Local notice

The county, city or town can object.

30 days

7

Inspection and license fee

The CCA inspects the site and you pay the initial license fee.

8

License issued or denied

A denial comes with written reasons.

Within 90 days

✓

Open for business

The draft rules give you 18 months from the license to become operational. Sales to adults can begin July 1, 2027.

Source: Code of Virginia § 4.1-1000 as amended by HB 30; CCA draft regulations, September 9, 2026 (not final).

The Virginia Cannabis Control Authority (CCA) may start accepting license applications on February 1, 2027. First-round microbusiness and conversion applications must open by then. Final rules are expected in December 2026 or January 2027. What you do before then decides whether you can file a clean application on day one. This checklist follows the statute and the September 9, 2026 draft rules.

1. Entity and ownership

- [ ] Form the legal entity that will apply. You may file only one application per license type, so decide which entity files for which license.
- [ ] Map every owner down to the ultimate beneficial owners. The rules must trace ownership through every intermediate entity.
- [ ] Identify every **principal**: anyone owning or controlling 5% or more, or anyone managing operations. Every officer, director and principal is background checked.
- [ ] Check the multi-license limits: an “interest” (10% or more, or a management role) in no more than five licenses (transporters excluded) and no more than one Tier V. Microbusiness and testing-lab owners may hold nothing else.
- [ ] If you are an impact applicant, make sure the qualifying owners have at least 51% ownership **and direct control**, with no side letters that give control away.
- [ ] Have counsel review investor, management and brand-licensing agreements. The Board must approve them and may look at price-setting, shelf space, financing dependency and shared staff. Passive stakes under 10% are presumed fine.

2. Background checks

- [ ] Run checks on all owners early. By statute, the Board must refuse a license if the applicant or any 10%+ owner has a felony (other than § 18.2-248.1) or a moral-turpitude offense within seven years, or has not finished the sentence.
- [ ] Note the draft rule: no one with a felony in the last five years may be a material owner, employee or agent of a marijuana establishment.
- [ ] A past marijuana conviction cannot by itself disqualify an applicant.
- [ ] If you use a third-party check instead of fingerprints, it must be requested no more than 60 days before you apply.
- [ ] Check local tax status. Being 90 or more days delinquent on local taxes is grounds for refusal.

3. Capital

- [ ] Budget for the draft fees. Retail is $4,000 to apply, $20,000 at initial authorization and $15,000 a year. Cultivation runs up to $7,500 / $50,000 / $45,000. Microbusiness is $1,000 / $2,500 / $6,000.
- [ ] Budget for the build-out, the 18-month preliminary-approval window and the time before revenue starts.
- [ ] Applicants must show financial responsibility. Impact applicants are excused from proof of funds at application.

- [ ] Plan for federal tax. Adult-use marijuana remained in Schedule I as of November 2026. The April 2026 federal order moved only FDA-approved products and state-licensed **medical** marijuana to Schedule III, so plan for Section 280E exposure.

4. Real estate and zoning

- [ ] Shortlist sites. You do not need a site to apply: under § 4.1-810 you must secure premises only at the final stage, and selected applicants have 18 months.
- [ ] Screen out sites within 1,000 feet of a hospital, school, college or child day program (retail and microbusiness). Localities can shrink, but not grow, that buffer. The draft rules also use 1,000 feet from schools and daycares for any establishment.
- [ ] Avoid sites where alcohol or tobacco is made, sold or used, and private residences.
- [ ] Talk to local planning staff about which zoning districts allow cannabis uses. The CCA can deny final approval if a site fails local zoning.
- [ ] Use contingent leases or options so you are not paying rent before you win.

See Finding Property: Zoning and Local Rules.

5. Labor peace agreement

- [ ] Every applicant must submit a labor peace agreement attestation signed by the applicant and a bona fide labor organization. Without it, the application is denied. Start these talks now.

6. Security plan

- [ ] Plan for commercial-grade locks, secured secondary entrances, approved safes or vaults, restricted key and code access, cameras, alarms and visitor logs. The draft rules list these in 3VAC10-40-140.
- [ ] Applicants selected in a lottery must file an updated security plan.
- [ ] Outdoor and greenhouse growers: plan lighting, fencing (8 feet for a greenhouse to count as indoor) and alarms.

7. Standard operating procedures

- [ ] Draft SOPs for inventory and seed-to-sale tracking, storage, recalls, waste disposal, transport manifests, ID checks, and sanitation.
- [ ] Draft an employee training program. The draft rules require training before anyone starts work and refreshers every year.
- [ ] Processors: plan for product registration and testing workflows.

8. Team

- [ ] Name a **responsible party**, who oversees operations, and designated supervisors.
- [ ] Line up key hires. All staff must be 21 or older.
- [ ] Testing labs: start ISO/IEC 17025 accreditation now.

9. Insurance and banking

- [ ] Get quotes for property, general liability, product liability and crop coverage from carriers that write cannabis.
- [ ] Open talks with a bank or credit union that serves cannabis businesses. Plan for cash handling and armored transport.
- [ ] Set up books that can track state marijuana tax (6%), local tax (1% to 3.5%) and sales tax separately. Returns are due monthly.

10. Stay current

- [ ] Read the final rules when they post (target: December 2026 to January 2027).
- [ ] Watch for the CCA's first licensing-period announcement, which will list

license types, numbers and dates.

- Attend or watch CCA Board meetings. The next one is December 16, 2026.

Who can help

- A Virginia-licensed cannabis attorney: entity, ownership, contracts, labor peace.
- A CPA: capital plan, Section 280E, tax systems.
- A licensing or operations consultant: SOPs, application narrative.
- A security consultant or integrator: the security plan.
- A commercial real estate broker: zoning-ready sites.
- An insurance broker that writes cannabis risks.
- A cannabis-serving bank or credit union.

This guide is general information, not legal advice.