



# IDFPR

## Illinois Department of Financial and Professional Regulation

Division of Professional Regulation

[idfpr.illinois.gov](http://idfpr.illinois.gov)

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Governor

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Secretary

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Director

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### **SB3222 Fact Sheet – Impacts to Licensed Dispensing Organizations**

**Disclaimer:** *This fact sheet is informational only, non-exhaustive, and should not be construed as legal advice, administrative rulemaking, or making binding statements of law. The Department of Financial and Professional Regulation recommends all licensees coordinate with their own legal counsel and comprehensively review all relevant laws and regulations to ensure continued compliance.*

**Did Illinois change its cannabis laws?** On June 12, 2026, Governor Pritzker signed Public Act 104-0463 ([SB 3222](#)), which makes important changes, updates, and clarifications to the Cannabis Regulation and Tax Act and the Compassionate Use of Medical Cannabis Program Act (“Cannabis Acts”). These statutory updates will impact how Illinois dispensaries are regulated by the Illinois Department of Financial and Professional Regulation (“IDFPR” or “Department”) and how consumers purchase cannabis in Illinois.

More information about these specific changes is identified by subject matter in the below informational charts: **Security; Licensing; Ownership; and Medical Licenses.**

**When will these changes take effect?** Most took effect immediately upon SB 3222’s signing, but one important change authorizing all licensed dispensaries to opt-in for a medical dispensary license will be available starting September 10, 2026.

**Is IDFPR doing anything additional to help licensees with these changes?** The Department is exploring providing additional outreach on the changes in SB3222, including hosting a potential town hall.

Additionally, IDFPR is reviewing its existing administrative rules and anticipates proposing any rules needed because of SB 3222 through the formal rulemaking process in the coming months.

Finally, many of these changes may require updates in the State’s seed-to-sale system, Metrc. IDFPR is working on providing more formal information on any Metrc changes in collaboration with our colleagues at the Illinois Department of Agriculture.

**What should dispensaries be doing right now?** Dispensaries should review the changes brought by SB 3222 with their operational staff and legal counsel. If a dispensary decides to update or change any of their dispensary floor plans, systems, or policies because of SB 3222, the designated

primary or alternate contact should contact IDFPR regarding those changes prior to implementation.

**What about hemp or grow licenses?** While these are important topics, this fact sheet is limited to those changes brought by SB 3222 most immediately impacting IDFPR dispensary licensees. IDFPR anticipates more information on both these topics will be forthcoming.

**Who can I reach out to with questions?** Questions about any of these changes should be directed to the specific inbox if noted in the charts below, or more generally to [FPR.AdultUseCannabis@illinois.gov](mailto:FPR.AdultUseCannabis@illinois.gov).

**Effective Immediately (June 12, 2026)**

<b>Security</b>	<b>Explanation</b>	<b>Citation</b>
<b>Drive-Through Windows and Curbside Pickup</b>	<p>Dispensaries may begin offering curbside pick-up and drive-through services. However, prior to offering drive-through or curbside, licensees need to have their systems reviewed and approved by IDFPR.</p> <p>To start the review process, send a request for review including an updated floor plan with a clear indication of where these services will be offered, an updated security plan, and standard operating procedures related to these services to <a href="mailto:FPR.AdultUseCannabis@illinois.gov">FPR.AdultUseCannabis@illinois.gov</a>.</p>	<p>410 ILCS 705/15-70(p)(7)(prohibition deleted);</p> <p>410 ILCS 705/15-85(d);</p> <p>410 ILCS 705/15-100(c)(5.5)</p>
<b>Security Guards</b>	<p>Dispensaries are no longer required to contract with third party security companies, and instead may hire their own security guards. Security guards must be present and provide security at all times that dispensaries are open for business. Dispensaries without a contract with a third-party security company must badge their security guards as agents to provide them with access to all areas of the dispensary.</p> <p>Additionally, dispensaries should review the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004, to ensure continued compliance with that Act.</p>	<p>410 ILCS 705/15-70(m);</p> <p>225 ILCS 447/;</p> <p>68 Ill. Adm. Code 1240</p>
<b>Camera Footage</b>	<p>Dispensaries may begin storing sixty (60) days of security footage rather than ninety (90) days.</p> <p>This does not impact any outstanding requests to store security camera footage for other reasons, such as active investigations.</p>	<p>410 ILCS 705/15-100 (i)(4)</p>

<b>Hours of Operation</b>	<p>Dispensaries may expand their hours of operations to 2am with local municipal approval.</p> <p>Licensed dispensing organizations must notify the Department of its operating hour changes by emailing <a href="mailto:FPR.CannabisEnforcement@illinois.gov">FPR.CannabisEnforcement@illinois.gov</a> with their new hours and proof of municipal approval for those hours.</p>	410 ILCS 705/15-70(j)
<b>In-State Possession Limits and Seed Purchases</b>	<p>Cannabis flower has been increased from 30 grams to 60 grams.</p> <p>Cannabis infused products have been increased from 500 milligrams of THC to 1,000 milligrams of THC.</p> <p>Cannabis concentrate has been increased from 5 grams to 10 grams.</p> <p>Additionally, registered medical patients in Illinois are authorized to purchase seeds from licensed dispensaries.</p>	<p>410 ILCS 705/10-10(a)</p> <p>410 ILCS 705/15-70(p)(16)</p>
<b>Out-of-State Possession Limits</b>	<p>Cannabis flower has been increased from 15 grams to 30 grams.</p> <p>Cannabis infused products have been increased from 250 milligrams of THC to 500 milligrams of THC.</p> <p>Cannabis concentrate has been increased from 2.5 grams to 5 grams.</p>	410 ILCS 705/10-10(b)
<b>Product Labeling Changes</b>	The specific dispensary name is no longer required to be included on cannabis products prior to sale.	410 ILCS 705/15-70(b)(deleted)

<b>Licensing</b>	<b>Explanation</b>	<b>Citation</b>
<b>Universal Badging</b>	Agent badges are no longer tied to individual dispensaries. As such, when an agent is terminated for any reason, their badge does not need to be returned to IDFPR. Terminations must still be reported to IDFPR within 5 business days, however. Additionally, agents-in-charge and principal officers remain tied to individual dispensaries.	410 ILCS 705/15-40(d)(struck) & (h)
<b>Electronic Badging</b>	Agents, agents-in-charge, and principal officers no longer need to physically display their badge, they can simply have it electronically available upon request.	410 ILCS 705/15-40(b)

<b>Medical Excluded Offenses</b>	Agents, agents-in-charge, and principal officers who previously were barred from holding a medical cannabis license solely due to a criminal conviction referred to as an “excluded offense” are no longer barred from holding such license. This is also true of future applicants.	410 ILCS 130/10 (deleted definition and all references to “excluded offense”)
<b>Responsible Vendor Program</b>	<p>There is now a year-round application submission window for Responsible Vendor Programs, rather than a limited window every other year. All RVPs will be on a two-year cycle from the date they were originally approved.</p> <p>Entities seeking to be approved as a Responsible Vendor Program should contact <a href="mailto:FPR.AdultUseCannabis@illinois.gov">FPR.AdultUseCannabis@illinois.gov</a> for more information and next steps.</p>	410 ILCS 705/15-40(n) and (q)

<b>Ownership</b>	<b>Explanation</b>	<b>Citation</b>
<b>Principal Officer Percentage</b>	<p>The definition of a principal officer increased the ownership percentage threshold from 1% to 5% for privately held companies. There may be some individuals who no longer meet the definition of a principal officer.</p> <p>If you need to update your table of organization and/or list of principal officers based on the threshold increase, please contact <a href="mailto:FPR.CannabisBusiness@illinois.gov">FPR.CannabisBusiness@illinois.gov</a>.</p>	410 ILCS 705/1-10 (definition of a “Principal Officer”)
<b>Consulting Agreements</b>	<p>There are new statutory financial thresholds and definitions for consultant or management agreements that trigger when an individual involved in such an agreement must register and be approved by IDFPR as a principal officer.</p> <p>Questions regarding management or consultant agreements and these thresholds can be sent to <a href="mailto:FPR.CannabisBusiness@illinois.gov">FPR.CannabisBusiness@illinois.gov</a>. Additional time may be required to process these agreements depending on the volume and complexity of the requests.</p>	410 ILCS 705/15-36

**Effective Beginning September 10, 2026**

<b>Medical Licenses</b>	<b>Explanation</b>	<b>Citation</b>
<p><b>Medical Dispensary License Opt-In</b></p>	<p>Any adult use dispensary holding an active license in good standing may opt-in for a medical dispensary license. This medical dispensary license will allow the dispensary to sell cannabis to medical cannabis patients at the medical tax rate up to the medical patient’s allotment.</p> <p>Additional information will be made available regarding the application and approval process for current 15-36 license holders. Conditional license holders who choose to opt-in should do so when submitting their 15-36 application after September 10, 2026, or at any time thereafter as this will be a rolling application process instead of a limited window.</p> <p>The law also prevents dispensaries from separating their adult use license from its medical license, either in the facility itself or in the ownership structure.</p>	<p>410 ILCS 705/15-37)(new)</p>
<p><b>Product Warning Label</b></p>	<p>All cannabis products sold to medical cannabis patients must contain a federally mandated warning label. This label must be applied prior to the sale to the patient and dispensaries are responsible for ensuring the label is properly affixed to the product.</p>	<p>410 ILCS 705/55-22)(new)</p>