

NOTICE OF FEDERAL LEGAL STATUS & NONDISCRIMINATION RIGHTS OF MEDICAL CANNABIS PATIENT

This letter is provided to inform covered entities, employers, housing providers, healthcare providers, government agencies, federally funded programs, and service providers of the changed federal legal status of medical cannabis patients following **AG Order No. 6754-2026*** and the need to review medical cannabis policies under federal civil rights and disability nondiscrimination standards.

On April 28, 2026, the U.S. Department of Justice published AG Order No. 6754-2026, which placed cannabis products regulated by state medical cannabis licenses into Schedule III of the federal Controlled Substances Act, recognizing their medical use. The Order recognizes state medical cannabis programs as part of the federal healthcare framework and acknowledges that licensed medical professionals oversee patient qualification under state medical cannabis laws.

The Order also gives federal legal effect to state medical cannabis patient documentation. By amending federal controlled substances regulations, including 21 C.F.R. § 1301.13, the Order provides for state-authorized medical cannabis certifications and similar patient documents to be recognized under federal law. In practical terms, participation in a qualifying state medical cannabis program may not be treated the same as unauthorized or nonmedical cannabis use.

The legal status of medical cannabis is now recognized under this federal framework; **policies affecting medical cannabis patients must be reviewed through the lens of disability nondiscrimination. The Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act** require accommodations to ensure equal treatment and access to housing, healthcare, employment, services, and benefits.

A violation of these rights may result in federal enforcement, civil liability, loss of eligibility for federal funding, fines, and corrective action. Entities covered by these laws should review medical cannabis policies to ensure they do not rely on outdated Schedule I assumptions, stigma, or categorical exclusion of patients solely because their medicine is cannabis. Decisions involving medical cannabis patients must include an individualized assessment and consideration of reasonable accommodations.

Blanket policies that exclude, penalize, or deny accommodation to a medical cannabis patient solely because of participation in a state-approved medical cannabis program raise serious federal civil rights concerns. This is especially true when the patient is seeking a reasonable accommodation related to their medication, medical condition, housing need, employment requirement, healthcare access, or participation in a federally funded program.

Contact Americans for Safe Access at info@safeaccessnow.org for support with updating your company, organization, or institution's medical cannabis policies.



*** AG Order No. 6754-2026" 91 Fed. Reg. 22714, April 28, 2026.**

www.federalregister.gov/documents/2026/04/28/2026-08176/schedules-of-controlled-substances-rescheduling-of-food-and-drug-administration-approved-products

PATIENT NOTICE OF FEDERAL STATUS & CIVIL RIGHTS PROTECTIONS

To Whom It May Concern:

I am a caregiver for a medical cannabis patient participating in a state-approved medical cannabis program. **Their medical cannabis use is authorized under state law and recognized under the federal legal framework established by AG Order No. 6754-2026.**

Documentation of my registration with a state medical cannabis program now has federal legal effect. I respectfully request that their medical cannabis patient status be considered through an individualized review process and in compliance with applicable federal disability nondiscrimination laws, including **the Americans with Disabilities Act, the Fair Housing Act, and Section 504 of the Rehabilitation Act.**

I am willing to provide appropriate documentation of my patient's current medical cannabis status if needed. I also request that any questions about their status, accommodation needs, or participation in a state medical cannabis program be handled confidentially and consistent with applicable privacy and disability rights protections.

If any service, housing, healthcare, employment, benefit, federal program participation, or reasonable accommodation is denied based on the medical cannabis patient status, I request that the denial be provided in writing. Please include the specific basis for the decision and explain how the decision complies with my rights, protections, and privileges under applicable federal civil rights and disability nondiscrimination laws.

Sincerely,

Caregiver Name: _____

Patient Name: _____

State Medical Cannabis Program: _____

Patient Registration/Card Number, if applicable: _____

Date: _____

www.SafeAccessNow.org/Notice_of_Federal_Legal_Status_Nondiscrimination_Rights



Please contact Americans for Safe Access info@safeaccessnow.org with any questions concerning the application of AG Order No. 6754-2026" 91 Fed. Reg. 22714, April 28, 2026, to your company or organization's cannabis policies.