

Utah Medical Cannabis Approved Dosage Forms

To: Medical Cannabis Policy Advisory Board
From: Nanette Berezchnyy
Released: June 9, 2026

Summary

This memo reviews Utah's currently approved medical cannabis dosage forms under Utah Code §26B-4-201(39) and compares them with approved forms in 15 other medical-only cannabis states. This is just an evaluation of where gaps exist between Utah's approved forms and those available to patients in comparable programs and to reflect what patients have asked for.

Utah's Currently Approved Dosage Forms

Under Utah Code §26B-4-201(39), the following constitute approved medicinal dosage forms for processed medical cannabis. Each processed form must have a specific and consistent cannabinoid content:

- Tablet
- Capsule
- Gelatinous cube / lozenge in cube or rectangular cuboid shape
- Concentrated liquid or viscous oil
- Liquid suspension (not to exceed 30 mL)
- Topical preparation
- Transdermal preparation
- Sublingual preparation
- Resin or wax
- Aerosol
- Suppository preparation
- Soft or hard confection (uniform rectangular cuboid or spherical shape, homogeneous, single-serving)
- Unprocessed cannabis flower (vaporization only, tamper-evident container)

Unprocessed cannabis flower is also approved when sold in a compliant, labeled, tamper-evident container for vaporization only.

The following are explicitly excluded regardless of form: combustion or smoking; any liquid suspension branded as a beverage; and any substance containing or covered with chocolate. Utah Code §26B-4-201(39)(c).

Dosage Forms Available in Other Medical-Only States but Not in Utah

The table below consolidates dosage form categories approved in at least one of the 15 medical-only states reviewed that are not currently available to Utah patients. State-specific statutory citations appear in Section III.

Category	Description	States Where Approved
Smoking / Combustible Forms	Whole or ground flower for smoking, pre-rolled products and concentrated cannabis in smokable form. Utah prohibits combustion.	Arkansas, Florida, Mississippi, Oklahoma, South Dakota
Infused / Edible Beverages	Cannabis-infused drinks, liquid beverage additives, powdered or syrup beverage mixes. Utah explicitly excludes any liquid suspension branded as a beverage.	Arkansas, Hawaii, Kentucky, Louisiana, Mississippi, Oklahoma
Liquids Exceeding 30 mL	Utah caps liquid suspensions at 30 mL per container. Several states permit larger volumes with no comparable cap.	Iowa, Louisiana, Pennsylvania, West Virginia
Non-Geometric / Unrestricted Edibles	Traditional food-format edibles not limited to uniform geometric shapes. Utah requires uniform rectangular cuboid or spherical single-serving shapes.	Arkansas, Florida, Kentucky, Louisiana, Mississippi, North Dakota, Oklahoma, South Dakota
Chocolate-Containing Products	Any substance covered to any degree with chocolate is explicitly excluded under Utah Code §26B-4-201(39)(c)(vi). Hawaii approves chocolates, cookies and brownies.	Hawaii
Other Food-Format Edibles	Honey, infused butters and similar food preparations not fitting Utah's confection shape requirement.	Hawaii
Pre-Rolled Flower Products	Pre-packaged, pre-rolled cannabis flower sold ready to smoke. Prohibited in Utah because combustion is prohibited.	Hawaii, New Hampshire, Oklahoma
Topical Dried Plant Material or Powder	Unprocessed cannabis flower or powder for topical application, distinct from processed topical preparations.	South Dakota

State-by-State Comparison

The following table shows, for each of the 15 medical-only states reviewed, which approved forms overlap with Utah and which do not.

State	Forms Shared with Utah	Forms Not Approved in Utah
Alabama	All Utah forms approved	None
Arkansas	Tablets, capsules, tinctures/oils, topicals, transdermal patches, suppositories, vaporizer formulations, flower (vaporization), geometric confections	Smoking/combustible forms; pre-rolls; infused beverages; unrestricted edibles
Florida	Inhalation (non-combustible), oral, sublingual, suppositories, topicals, geometric confections	Smoking; non-geometric/unrestricted edibles
Hawaii	Ointments/lotions, transdermal patches, aerosols, concentrates for inhalation, capsules, lozenges, pills, tinctures, gummies (geometric), hard molded confections (geometric)	Pre-rolls; infused butters; chocolates; cookies; brownies; honey; beverages; powdered/syrup beverage mixes
Iowa	All Utah forms; liquids ≤30 mL	Liquids exceeding 30 mL
Kentucky	Oils, topicals, tinctures, dermal patches, suppositories, flower (vaporization), capsules, geometric confections	Beverages; non-geometric/unrestricted food edibles
Louisiana	Oils/extracts/tinctures/sprays, solid oral dosage forms, liquids ≤30 mL, geometric gelatin/pectin chewables, topicals, transdermal patches, suppositories, metered-dose inhalers	Combustible forms; liquids >30 mL; non-geometric/unrestricted edibles
Mississippi	Flower (vaporization), concentrates/extracts, topicals/oils, suppositories, lozenges, geometric confections	Smoking/combustible; infused beverages; non-geometric/unrestricted edibles
New Hampshire	Flower (vaporization), concentrates/oils, topicals/patches, tinctures, geometric confections	Smoking/combustible; pre-rolls; infused beverages; non-geometric/unrestricted edibles
North Dakota	Cannabinoid solution, capsule, transdermal patch, topical, geometric confections	Non-geometric/unrestricted edible products
Oklahoma	Flower (vaporization), concentrates/vape cartridges, tinctures/liquid drops, topicals, geometric confections	Smoking/combustible; pre-rolls; infused beverages; non-geometric/unrestricted edibles
Pennsylvania	Pills, oils, topicals, tinctures, liquids ≤30 mL, dry leaf/flower for vaporization, concentrates for vaporization	Liquids exceeding 30 mL
South Dakota	Vaporizer products, cannabis oil/tincture (capsule/oral syringe), geometric	Concentrated cannabis in smokable form; topical dried plant material or powder; non-geometric/unrestricted edibles

State	Forms Shared with Utah	Forms Not Approved in Utah
	confections, topical ointment/cream/lotion, transdermal patches	
Texas	Low-THC tablets/capsules/pills, tinctures/solutions, topicals/lotions, transdermal patches, suppositories, non-smoked aerosols/vaporizers, geometric confections	Smoking/combustible; non-geometric/unrestricted edibles
West Virginia	Pills, oils, topicals, tinctures, liquids ≤30 mL, dermal patches, dry leaf/flower for vaporization	Liquids exceeding 30 mL

What Other States Are Doing

Among the 15 states reviewed, Utah's approved form list is among the more comprehensive for processed pharmaceutical-style products. Alabama approves every form Utah approves and nothing beyond. Iowa, Pennsylvania and West Virginia align closely with Utah, with the principal difference being liquid volume caps.

The most common categories of forms not available in Utah are:

- **Non-geometric edibles** — approved in some form in 8 of 15 states
- **Smoking or combustible forms** — approved in 5 of 15 states
- **Infused or edible beverages** — approved in at least 6 of 15 states in some form
- **Liquids exceeding 30 mL** — permitted in 4 of 15 states

Utah's prohibition on combustion is consistent across its statutory framework and reflects a deliberate public health posture shared by several other states, including Iowa, Alabama, Texas and North Dakota.

What Patients Are Asking For

Patient feedback and the current subsidy waitlist both reflect ongoing affordability and access pressure. The dosage form gaps most relevant to patient-raised concerns are:

- **Combustion/smoking:** This is the most frequently requested form by patients. Five of the 15 states reviewed permit some form of smokable cannabis. Patients consistently cite familiarity, cost and immediate onset as reasons for the request.
- **Liquid volume cap (30 mL):** Patients who rely on liquid suspensions for dosing flexibility — particularly pediatric patients or those with swallowing difficulties — report that the 30 mL limit requires more frequent pharmacy visits and increases per-dose cost. Four states (Iowa, Louisiana, Pennsylvania, West Virginia) impose no comparable cap.
- **Non-geometric confections:** Patients report that the geometric shape requirement limits product variety and that some patients, particularly those with swallowing or dexterity limitations, find non-geometric formats easier to dose. Eight states permit unrestricted or less restricted edible formats.
- **Infused beverages:** A consistent cohort of patients — particularly those managing nausea or requiring precise low-dose titration — have raised interest in cannabis-infused beverages as an alternative to current forms. At least six states permit some form of infused beverage.

Sources

- [Utah Code §26B-4-201\(41\)\(a\)](#), effective May 6, 2026
- State statutory and regulatory citations: [Alabama Code §20-2A-3](#); [Ark. Const. Amend. 98](#); [FAC 64ER22-8 \(FL\)](#); [HAR §11-850-72 & 76 \(HI\)](#); [Iowa Admin. Code r. 641-154.13](#); [915 KAR 1:040 \(KY\)](#); [LAC 51:XXIX:21 \(LA\)](#); [Miss. Code Ann. §41-137-39](#); [N.H. Rev. Stat. Ann. §126-X:1](#); [N.D. Cent. Code §19-24.1-01](#); [63 Okla. Stat. §427.2](#); [28 Pa. Code §1151a.28](#); [ARSD 44:90:02:16 \(SD\)](#); [Tex. Occ. Code §169.001](#); [W. Va. Code §16A-3-3](#)