

Medical Cannabidiol is a Schedule I controlled substance.

[21 U.S.C. § 812 \(2020\)](#)

[21 U.S.C. § 841 \(2020\)](#)

[21 U.S.C. § 848 \(2020\)](#)

§903. Application of State law

No provision of this subchapter shall be construed as indicating an intent on the part of the Congress to occupy the field in which that provision operates, including criminal penalties, to the exclusion of any State law on the same subject matter which would otherwise be within the authority of the State, unless there is a positive conflict between that provision of this subchapter and that State law so that the two cannot consistently stand together.

(Pub. L. 91–513, title II, §708, Oct. 27, 1970, 84 Stat. 1284.)

[21 U.S.C. § 903 \(2020\)](#)

A positive conflict is one that can't be reconciled.

§822. Persons required to register

(d) Waiver

The Attorney General may, by regulation, waive the requirement for registration of certain manufacturers, distributors, or dispensers if he finds it consistent with the public health and safety.

Federal law allows exemptions, which provides a path to reconcile state law (Iowa Code Chapter 124E) with federal law:

[21 U.S.C. § 822\(d\) \(2020\)](#)

An application for exemption can be found at

[21 C.F.R. § 1307.03 \(2021\)](#)

An exemption exists for a church at

[21 C.F.R. § 1307.31 \(2021\)](#)

Guidelines for applications for religious exemptions exist at:

[Guidance Regarding Petitions for Religious Exemption - February 26, 2018](#)

[DEA Registration for Religious Organizations](#)

The Obama Administration incorrectly encouraged states to authorize violation of federal drug law rather than applying for an exemption, at

[Cole Memorandum of August 29, 2013](#)

[Cole Memo author joins National Cannabis Roundtable as adviser](#) - December 17, 2021