State of Rhode Island and Providence Plantations
DEPARTMENT OF BUSINESS REGULATION
1511 Pontiac Avenue, Bldg. 68-1
Cranston, Rhode Island 02920

Medical Marijuana Program Bulletin Number 2020-1

Compassion Center Temporary Permitted Pickup Procedures

This Bulletin is issued by the Rhode Island Department of Business Regulation ("DBR"), Office of Cannabis Regulation ("OCR") to provide guidance regarding limited permissible curbside pickup of medical marijuana preorders by qualified registered patients, caregivers and authorized purchasers at licensed compassion centers, on a temporary basis during the COVID-19 public health emergency. This guidance is issued in accordance with Rhode Island General Laws § 21-28.6-12 *et seq*., and the Rules and Regulations Related to the Medical Marijuana Program Administered by the Department of Business Regulation 230-RICR-80-5-1, as amended (the "Regulations"). Preorder curbside pickup and delivery of medical marijuana pursuant to this Bulletin shall only be permitted during the pendency of this Bulletin and shall be subject to compliance with all terms and conditions herein, a compassion center's plan submitted and approved by OCR, the Act and the Regulations. Upon OCR's notification to a compassion center that OCR has terminated this guidance and/or any approval issued hereunder, the compassion center shall immediately cease all curbside pickup and delivery.

Compassion center licensees must comply with the interim guidance for businesses and employers issued by the Department of Health with respect to planning, preparing and responding to the coronavirus disease (COVID-19) including cleaning, disinfection, hygiene and social distancing practices as the same may be updated from time to time. See the following link for further information. https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/businesses-employers.html Licensees shall also comply with all current and future Executive Orders issued concerning the COVID-19 public health emergency – centers shall keep apprised of such orders available at http://www.governor.ri.gov/ and updates made through announcements on local news outlets.

Subject to the foregoing, effective March 17, 2020, OCR will accept from a licensed compassion center a proposed plan for preorder curbside pickup of medical marijuana by qualified registered patients, caregivers and authorized purchasers in limited, designated and approved areas of the compassion center's parking lot premises, on a temporary basis during the COVID-19 public health emergency, subject to all terms and conditions in this Bulletin and any plan approval issued by OCR. Such preorder curbside pickup and delivery of medical marijuana shall be deemed "permitted sales" and "permitted compassion center activity" under the Regulations provided all such medical marijuana sales are in compliance with the plan approved by OCR, the Act, the Regulations and this Bulletin including the following:

- Prior to implementation, the compassion center's proposed curbside pickup plan has been approved by the Office of Cannabis Regulation.

- Medical marijuana shall only be delivered to a valid qualifying patient cardholder, registered caregiver or authorized purchaser who has been issued a valid registration card by the Rhode Island Department of Health.
- The patient/caregiver/authorized purchaser must have visited the compassion center before this "pick-up" visit and must have all their information up to date in the compassion center's system.
- The patient/caregiver/authorized purchaser will call ahead/order online before they arrive for the pick-up.
- The compassion center will give the patient/caregiver/authorized purchaser a designated time for the pick-up.
- At the time of preorder, the compassion center will inform the patient/caregiver/authorized purchaser the total amount for purchase and the designated pick up time. Purchases must be paid for in advance.
- At the time of preorder, the compassion center will inform the patient/caregiver/authorized purchaser of the limited, designated pickup areas and that they are required to pick-up their preorder in such designated area.
- At pickup, the compassion center representative person will verify the patient/caregiver/authorized purchaser registration card with a second form of identification.
- All purchases and curbside pickups shall be tracked properly in the track and trace system and records will be made available to the OCR upon request.
- Compassion centers may only conduct such curbside pickup and delivery between the hours of 8:00 am and 8:00 pm.
- The compassion center's plan shall include appropriate measures to avoid traffic congestion and lot overflow. The compassion center shall comply with local and law enforcement traffic regulation requirements.
- Before commencing preorder pickup and delivery hereunder, the compassion center must receive OCR approval of its plan and security protocols including pickup vehicle verification procedures and security camera locations and remote access systems.
- Delivery personnel may not accept tips or compensation of any kind from the registered patient, caregiver or authorized purchaser to whom they are delivering.
- Compassion centers may not charge a fee for preorder curbside pickups.
- Products available for preorder pickup must follow the same pricing structure as products sold to walk-in registrants at the compassion center's retail location.

Any questions concerning this Bulletin or requirements under the Act and Regulations should be directed to dbr.mmpcompliance@dbr.ri.gov.

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Dated: March 17, 2020