

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**DISPENSARY REQUIREMENTS—MEETING SUMMARY**

**REDDING**

**September 19, 2016**

**Topic 1: Subtypes of Dispensary Licenses**

**BMCR Thoughts: Establish a subtype of dispensary license that is delivery-only. The delivery-only dispensary license would require a brick and mortar premises but would allow for delivery, non-storefront retail sales to qualified patients and primary caregivers. BMCR and law enforcement would maintain the right to inspect the premises at any time.**

**COMMENTS:**

- It is a good idea to have separate delivery-only dispensary licenses.
- Currently, the role of the distributor is not well defined.

**Topic 2: Employee Requirements**

**BMCR Thoughts: Require licensees to maintain an accurate, up-to-date roster of all employees (i.e. contractors, full-time and part-time employees, delivery employees, etc.) and accompanying information on each employee as part of their records. The information would include data such as the date the employee started, all applicable training, job description and any employee information maintained by the licensee.**

**COMMENTS:**

- There is currently no industry standard when it comes to training dispensary employees.
- There should be basic training requirements for dispensary employees. (repeated twice)
- The state should provide more guidance on what kind of training is required.
- Confused as to the role of a distributor.
- Concerned that there may be a monopoly created for providing state-approved training.
- Do not like the idea of possibly limiting approved training companies. There should be many options for the industry to choose from when it comes to employee training.
- Like the idea of Bureau-approved training programs but want to ensure that there are enough options that a monopoly is not created.
- Would like to have the ability to have the cannabis business become certified to train, and then they could provide approved training to their own employees.
- It would be beneficial to have managers “certified.” This essentially means that managers of dispensaries would have to undergo specified training and then be responsible for ensuring that their employees are trained.
- Suggestion that the Bureau run the training programs.
- Dispensary employees should have something similar to continuing education credits to ensure

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<p>that they are up-to-date.</p> <ul style="list-style-type: none"> <li>• Approve of the idea of maintaining employee rosters. (repeated once)</li> </ul>
<p><b>QUESTIONS:</b></p> <ul style="list-style-type: none"> <li>• Who would qualify as an employee under this rule? Does it include contractors?</li> <li>• What kind of training requirements will there be?</li> <li>• How do you define training?</li> </ul>
<p><b>MAIN THEMES:</b></p> <ul style="list-style-type: none"> <li>• The issue of required training for employees should be addressed.</li> </ul>

**Topic 3: Delivery Requirements: Manifests, Storage**

**BMCR Thoughts:**

- 1. Require the following information on all delivery manifests:**
  - a. Name and license number of dispensary;**
  - b. Name of primary caregiver or qualified patient who ordered the medical cannabis or medical cannabis products;**
  - c. Number of units or weight of items being transported;**
  - d. Strain and product type of medical cannabis and medical cannabis products in shipment;**
  - e. Unique identifiers of all products in shipment;**
  - f. Travel route, start and end time; and**
  - g. All planned stops on travel route.**
- 2. All dispensary delivery vehicles shall be equipped with the following:**
  - a. Refrigeration;**
  - b. Specialized locking system for storage of medical cannabis and medical cannabis products;**
  - c. Vehicle alarm system; and**
  - d. Separation between the people in the vehicle (i.e., drivers and passengers) and the shipment.**

<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• Concern that there are not enough safeguards in place to ensure that the delivery is going to the proper place.</li> <li>• Cannabis delivery should be treated the same as pharmaceutical deliveries. (repeated once)</li> <li>• There are concerns about mistreatment by law enforcement during traffic stops.</li> <li>• Deliveries should be done in a discreet way. Identifiable “exit bags” should not be used.</li> <li>• There is currently no universal identification number used for all cannabis patients.</li> <li>• Suggestion to limit deliveries to homes or nursing homes.</li> <li>• Currently, couriers are willing to deliver cannabis products all over the state.</li> <li>• Suggestion to limit the number of deliveries a driver is allowed to make in a single day or a single trip.</li> <li>• Suggestion to require a ratio of drivers to patients.</li> <li>• It should be a business’s decision to properly staff deliveries. State should not require ratios.</li> <li>• The proposed manifest is overregulation. There is no need to list the travel route and planned stops.</li> <li>• The purpose of delivery is more than just to transport the cannabis to the patients. It also</li> </ul>
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includes the treatment of sick patients. There should be some time allotted for compassionate-care duties.

- There is a concern that strict time-keeping during deliveries will harm patients.
- Unsure whether there is a need to list the strain on the manifest.
- Refrigeration devices in the delivery vehicle should only be required if the specific products being delivered require refrigeration.
- Adding refrigeration to a vehicle is not very difficult or expensive.
- Concerns about keeping cash and receipts in a delivery vehicle.
- Suggestion to require keeping cash in a lockbox during delivery.
- Concerns about insurance and the requirements of having a lockbox for insurance purposes.
- Suggestion to disallow labeling on the outside of delivery vehicles.
- Suggestion to require cameras inside the delivery vehicle.
- Suggestion to require registration of delivery vehicles with the dispensary and with the Bureau.
- Suggestion: use of a one-way lockbox.
- A standard for delivery vehicles is required and does not currently exist.
- Suggestion to require technology that allows the vehicle's location to be tracked by the dispensary via GPS.

**QUESTIONS:**

- Will there be a limit placed on the amount of product a delivery employee can carry at any given time?
- Will the transfer of a license from one owner to another be allowed?
- Will special insurance for delivery vehicles be required by the bureau?

**MAIN THEMES:**

- Deliveries should be allowed to be flexible to deal with changing circumstances.

#### Topic 4: Transaction Limits

**BMCR Thoughts: Set the transaction limit for an individual patient within the following range for all dispensaries, based on other states:**

1. **2.5 oz. per month of usable medical cannabis, regardless of product type;**
2. **5 oz. per month of usable medical cannabis, regardless of product type; or,**
3. **Limitations as follows:**
  - a. **24 ounces of dried flower;**
  - b. **16 ounces solid or 72 fluid ounces of liquid medical cannabis product;**
  - c. **16 ounces of cannabinoid concentrate whether sold alone or in an inhalant delivery system;**
  - d. **Five grams of a cannabinoid extract whether sold alone or in an inhalant delivery system;**
  - e. **Four immature medical cannabis plants; and, 50 seeds.**

**COMMENTS:**

- Want exemptions for maximum limits. Some patients require more medication.
- Do not want to get into the practice of tracking patients and their buying habits.
- It is too onerous to keep track of monthly purchase amounts for each patient.
- Suggestion: Compare to limits in pharmaceutical industry.
- Understand the need for limits but suggest larger limits over smaller limits.

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| <ul style="list-style-type: none"><li>• The industry should wait on more science to determine whether limits are necessary before placing limits.</li><li>• Suggestion: base the limit on the maximum amount that an individual can physically consume in a certain amount of time.</li><li>• Patient confidentiality is important. Must think of the patients first when deciding on any rules.</li></ul> |
| <b>QUESTIONS:</b> <ul style="list-style-type: none"><li>• Request for more clarity on the topic of cross licensing.</li></ul>  |
| <b>MAIN THEMES:</b> <ul style="list-style-type: none"><li>• Any limits set should allow patients to get the medication they require.</li></ul>   |






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