



State of Rhode Island
DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation
560 Jefferson Blvd Suite 204
Warwick, RI 02886

Bulletin 2024-01 Supersedes Medical Marijuana Program Bulletin Number 2020-1 Compassion Center Permitted Curbside Pickup Procedures

Effective Date: 2/5/2024

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Office of Cannabis Regulation (“OCR”) to provide guidance regarding permissible curbside pickup of cannabis preorders by qualified registered patients, caregivers, authorized purchasers, and adult-use consumers 21 years of age or older at licensed compassion centers. 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”). Curbside pickup of cannabis products 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, and 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.

Subject to the foregoing, OCR will accept from a licensed compassion center a proposed plan for curbside pickup of cannabis products by qualified registered patients, caregivers, authorized purchasers, and adult-use consumers 21 years of age or older in limited, designated and approved areas of the compassion center’s parking lot premises, subject to all terms and conditions in this Bulletin and any plan approval issued by OCR. Such curbside pickup of cannabis products shall be deemed “permitted sales” and “permitted compassion center activity” under the Regulations provided all such 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 must submit a variance request and receive OCR approval of its plan and security protocols including but not limited to pick up vehicle verification procedures, patient status and/or age verification process, security camera locations, and patient priority procedures.
- Cannabis shall only be made available for curbside pick-up 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 or the issuing cannabis authority of another state, or an adult-use consumer 21 years of age or older with a valid government identification card.
- 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.
- The purchaser may place the order before they arrive for the pick-up.

- At the time of preorder, the compassion center will inform the purchaser the total amount for purchase and the designated pick-up time. Purchases may be paid for in advance.
- At the time of preorder, the compassion center will inform the 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's authorized representative will verify the patient/caregiver/authorized purchaser registration card with a second form of valid identification or that the adult-use consumer is of 21 years of age or older and possesses a valid government issued identification card.
- 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 during their current operating hours.
- Compassion centers may not charge a fee for preorder curbside pickups.
- Compassion centers shall prioritize patient, caregiver, or authorized purchaser pick-up orders.
- Cannabis 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.