



**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 2018-3

**Guidance Regarding Licensed Compassion Centers Sale of Medical
Marijuana to Out of State Patient Cardholders**

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Medical Marijuana Program (“Program”) to provide guidance regarding licensed compassion center sales of medical marijuana to out of state patient cardholders in accordance with Rhode Island General Laws § 21-28.6-1 *et seq.*, as amended by P.L. 2018, ch. 047, Article 14 (as so amended, the “Act”) and the *Rules and Regulations Related to the Medical Marijuana Program Administered by the Department of Business Regulation 230-RICR-80-5-1* (the “Regulations”). Effective June 22, 2018, a compassion center licensee may dispense and sell marijuana to out of state patient cardholders, and such sales shall be deemed “permitted sales” under § 1.4C of the Regulations, provided marijuana is dispensed and sold in compliance with the Act and the Regulations, including the following:

- The compassion center uses reasonable good faith efforts to verify that each out of state patient cardholder possesses a current, valid registration card issued lawfully under the issuing state’s medical marijuana program. These good faith efforts shall include requiring presentation of the patient’s medical marijuana registration card (or equivalent document provided by the issuing state) and one other form of government issued photo identification. Copies of such cards shall be maintained for the compassion center’s records.
- The compassion center requires each out of state patient cardholder to complete an intake form (which form is acceptable to the Department) and inputs the intake information, including the home state card registration number (or if the home state registration number is not available, a unique identifier assigned by the compassion center), into the compassion’s center tracking system.
- The compassion center logs and tracks all transactions with each out of state patient cardholder in the tracking system by the issuing state’s patient card registration number and otherwise in the same manner as it uses to log and track transactions with Rhode Island resident patient cardholders.
- The compassion center maintains the same standards of confidentiality as to each out of state patient cardholder’s information as it does for information regarding Rhode Island patient cardholders.

- The compassion center provides to each out of state patient cardholder a disclosure form (which form is acceptable to the Department) regarding requirements and prohibitions under the Act and Regulations that are applicable to dispensing and use of medical marijuana within the State of Rhode Island, including without limitation disclosures regarding marijuana dispensing and possession limits, prohibition of taking marijuana and marijuana products across state lines and prohibition of smoking in public places.
- The compassion center provides training to compassion center employees, agents and volunteers regarding its policies and procedures for dispensing to and transactions with out of state patient cardholders.
- Records regarding dispensing and transactions with out of state patient cardholders and applicable policies and procedures shall be maintained in compliance with and subject to inspection and review in accordance with the compassion center's records retention policies and the Regulations.

The information in this Bulletin is provided for general information purposes only and reflects the current law applicable to licensed compassion centers under the Act and the Regulations. No information contained herein is intended or should be construed as legal advice or as guidance with respect to other state or federal laws. Readers are encouraged to consult their legal advisors.

Any questions concerning this Bulletin should be directed to dbm.mmpcompliance@dbm.ri.gov.



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