



**DEPARTMENT OF BUSINESS REGULATION  
Office of Cannabis Regulation**

**Title: Brief Summary of Certain Identical Comments received during the November 21, 2019 to December 21, 2019 Comment Period for Proposed Amendments to 230-RICR-80-05-1, Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation.**

**Date: February 4, 2020**

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During the public comment period (11/21/2019 to 12/21/2019) for amendments to 230-RICR-80-05-1, the Department of Business Regulation (“DBR”) received 1169 letters from persons identifying as patients who submitted commentary regarding opposition to proposed restrictions on the use of out-of-state medical marijuana cards at Rhode Island compassion centers. Of the 1169 letters, DBR reviewed and sorted each letter and identified 11 different letter templates that were each signed by different individuals. A representative sample of each of the distinct letter templates is attached, with the patients’ name and any personal information redacted. Please refer to the number in the top right corner to determine how many identical copies were received in total.

- Letter #001 – 210 letters
- Letter #002 – 180 letters
- Letter #003 – 67 letters
- Letter #004 – 65 letters
- Letter #005 – 68 letters
- Letter #006 – 67 letters
- Letter #007 – 70 letters
- Letter #008 – 194 letters
- Letter #009 – 56 letters
- Letter #010 – 73 letters
- Letter #011 – 119 letters

**Business Regulation  
MMP Compliance**

**DEC 02 2019**

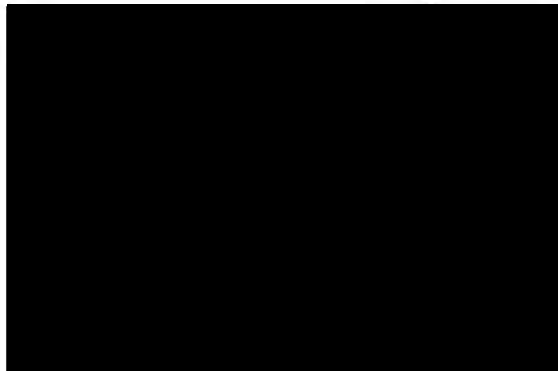
11/30/19

**RECEIVED**

To the Regulators for the State of RI MMP;

If you require out-of-state patient recommendations to be matched by a form of identification from the state in which the recommendation came, our medical marijuana program will end. Thousands of frustrated patients like me took advantage of the out-of-state proposal you put forward because it saved us money and came with no delay. Your process at the Health Department is slow, costly, and still uses paper. If you make this change, none of us will stay in the RI program. You will lose all the tax revenue to the black market or to Massachusetts stores. This is a terrible provision, especially when you set us up to use the out-of-state recommendations in the first place.

Cordially,



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DEC 16 2019

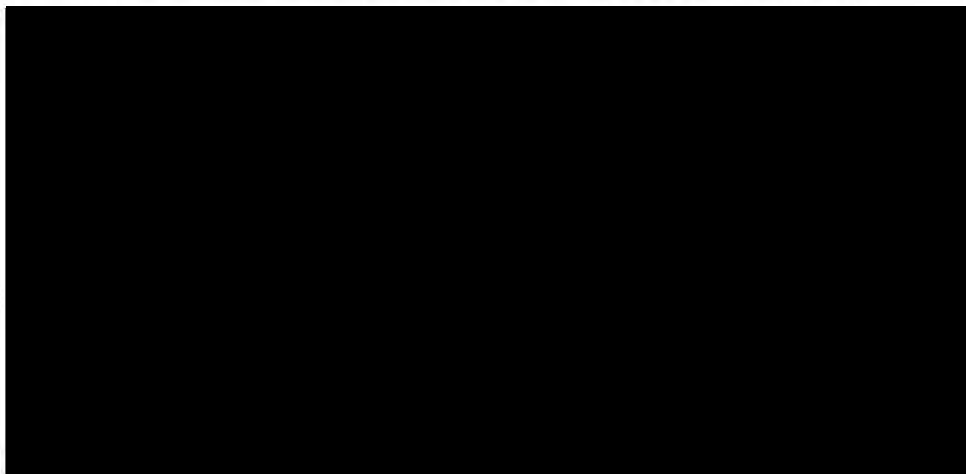
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Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

I am a current medical cannabis patient. My medicine is very important to me. I am asking that you please do not require patients with out-of-state recommendations to have to submit a second form of identification that matches the state in which my recommendation was received. This change will cause me to no longer receive my medicine in Rhode Island because of the difficulties with finding a medical provider willing to sign for my condition. The expense of obtaining a recommendation from a local clinic is also a significant barrier. If this change goes through I would probably be forced back to unregulated sources for my medicine or perhaps crossing over to Massachusetts. This is something that I do not want to do.



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DEC 19 2019

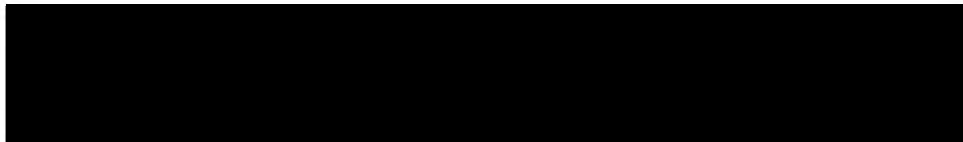
RECEIVED

Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

I am writing to ask that you please consider the needs of patients and do not change the rules for out-of-state recommendations. It will cause people like me to no longer get medicine. You allowed us to benefit from the ease and small expense of out-of-state recommendations. This was a good thing for those of us who are sick and don't have lots of resources. Now you are taking it away in such an immediate and cold-hearted fashion. This move will cause lots of patients like me to go without the medicine we need.



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DEC 09 2019

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Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

I am a patient. I believe in this program. Your changes to the out-of-state recommendations (requiring an ID from the state of the recommendation) is so harmful. It will cause people like me to leave the RI program and find meds elsewhere. Please do not do this.



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DEC 19 2019

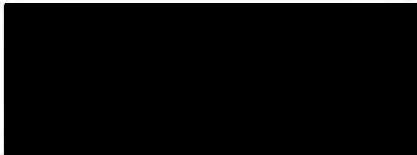
RECEIVED

Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

If you change the allowance for out-of-state recommendations, there will be massive disruption in our program. Patients will not deal with the expense and delay of the antiquated system of the DOH. We'll just have to get meds elsewhere. This is such a harmful thing to do to us. Please do not change the compassionate provision that currently exists for out-of-state recommendations.



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**DEC 02 2019**

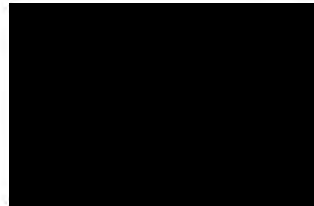
**RECEIVED**

Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

Please do not put in your final regulations the requirement for a second form of identification from the state where my recommendation comes from. This will result in my not being able to get my medicine because of the expense and delay in receiving a recommendation in RI. If you do make this change, I respectfully ask that you either recognize our existing recommendations until they expire or provide us with a period of time between 9 months and a year to try to find a pathway to obtaining a recommendation here.



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DEC 09 2019

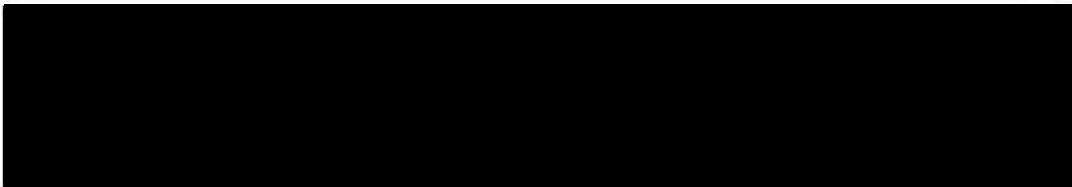
RECEIVED

Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

Please do not make a change to the requirements for out of state patient recommendations. This is anti-patient. Why would you put barriers for us when you made the out-of-state recommendations an option? This will end our program as we know it and will hurt patients.





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12/01/2019

To whom it may concern at the RI DBR,

I am a Rhode Island medical marijuana patient and my card will be up for renewal within the year. I am writing to you to formally request that you streamline the process for obtaining a medical marijuana card and create a more user-friendly system. Currently, the experience of obtaining a legitimate Rhode Island medical marijuana card is expensive, time consuming and extremely difficult to navigate.

My primary care physician will not engage in conversation regarding the program nor sign the MMP application. My local dispensary has informed me that they are not allowed (per DBR instruction) to advise or refer me to a clinic that specializes in approving MMP conditions. I do not know where to obtain this information or ANY information regarding access to MMJ consultants. This intentional absence of information is disheartening, and the process is intimidating to people new to the program and in need.

I have been told by other patients that the easiest way to get one's card is online through a clinic in California. If this is no longer the case, I sincerely urge the DBR to follow suit with Mass and make the process user-friendly. The current application process is so laborious, it is easier to buy on the street.

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

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DEC 19 2019

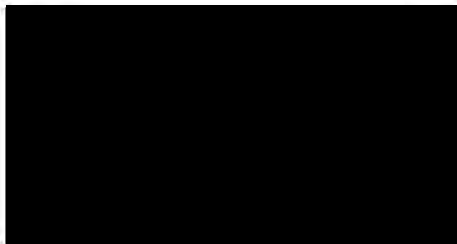
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Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

When the state allowed for out of state patient recommendations it was done as a way to target CannaCare. CannaCare's recommendations in RI allowed us to grow. Many people in the state said they wanted this to stop because they didn't want patients to have home grow rights. I feel like the state has set us down a path to get out-of-state recommendations as a way to cut back on grow rights, but now is looking to change the rules. This move will result in thousands of people leaving the RI market. It will harm cultivators too because no one will be left to buy their meds. This change cannot be implemented so soon without an ability for patients to get a RI MMJ license. Why are you trying to ruin this program? And why did you set up patients with a good provisions only to now take it away? This is such an anti-patient change. It is a gift to black market drug dealers and recreational stores in Mass. I urge you not to do it.



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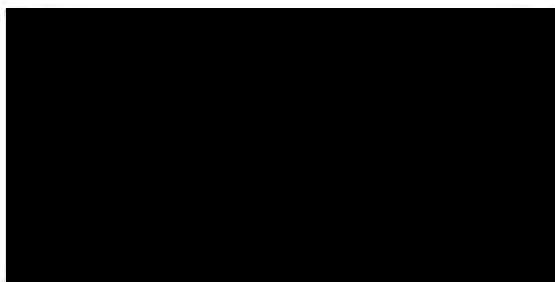
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Erica Ferrelli  
Department of Business  
1511 Pontiac Ave, Bldg 68-1  
Cranston, RI 02920

RE: Proposed Rules for Medical Marijuana Program

Dear Ms. Ferrelli:

When the state allowed for us to go get an out-of-state recommendation from a doctor I was so relieved. None of my doctors would write a recommendation for me here. The ones that would wanted too much money. The ease and low cost of my out-of-state recommendation has been a lifeline for me. Now you are looking to take it away immediately. This will have a terrible impact of a lot of patients like me, who will simply no longer be able to buy medicine in Rhode Island. Please do not make this change. It is so harmful to patients like me.



**Business Regulation  
MMP Compliance**

DEC 02 2019

**RECEIVED**

ERICA FERRELLI  
DEPARTMENT OF BUSINESS  
1511 PONTIAC AVE, BLDG 68-1  
CRANSTON, RI 02920

RE: PROPOSED RULES FOR MEDICAL MARIJUANA PROGRAM

DEAR MS. FERRELLI:

I AM WRITING IN OPPOSITION TO THE PROPOSAL TO HAVE OUT-OF-STATE RECOMMENDATION BE MATCHED BY A FORM OF ID FROM THE STATE WHERE THE RECOMMENDATION CAME. THE OUT-OF-STATE RECOMMENDATION IS MY LIFELINE, AS I CANNOT AFFORD THE EXPENSE OF A RECOMMENDATION HERE. THE STATE ALLOWED THIS PRACTICE TO TAKE PLACE AND MANY PATIENTS LIKE ME WERE SO GRATEFUL BECAUSE IT WAS COST EFFECTIVE AND DID NOT RESULT IN DELAY IN GETTING MY MEDICINE. NOW WE COULD BE LEFT OUT IN THE COLD AND NO LONGER ABLE TO GET MEDICINE HERE. THIS IS A HARMFUL PROPOSAL THAT WILL FORCE PATIENTS BACK INTO THE BLACK MARKET OR TO REC STORES IN MA. PLEASE DO NOT HARM PATIENTS IN THIS WAY – ESPECIALLY AFTER YOU OPENED THE DOOR FOR US WITH THIS ALLOWANCE.

