

## Operations Manual

**Procedures for the organization, administration, command, and control of the compassion center or licensed cultivator (including but not limited to organizational chart, chain of command protocols, etc.).**

Organizational Chart, Chain of Command Documents forthcoming pending advice from legal counsel.

## Tracking System

South County Compassion's [REDACTED] tracking system. SCC [REDACTED] for purposes of point-of-sale tracking, inventory tracking, and all compliance related information.

The COO [REDACTED] Each department manager, and all employees [REDACTED] will be fully trained [REDACTED]

South County Compassion will ensure all employees are trained on the use of the medical marijuana program tracking system for all information related to the acquisition, propagation, cultivation, transfer, manufacturing, processing, testing, storage, destruction, wholesale and/or retail sale of all marijuana and medical marijuana products possessed by South County Compassion in accordance with the Act , which will be kept completely up-to-date in the Medical Marijuana Program Tracking System, including but not limited to:

1. Planting and propagation of plants;
2. Transition of immature to mature plants;
3. Harvest dates with yield documentation;
4. Destructions of immature plants, mature plants and medical marijuana products;
5. Transportation of immature plants, mature plants, and medical marijuana products;
6. Theft of immature plants, mature plants, and medical marijuana

- products;
7. Adjustment of product quantities and/or weights;
  8. Conversion of product types including waste documentation;
  9. Required test results as reported by a cannabis testing laboratory;
  10. Retail and wholesale transaction data;
  11. Product compliance data;
  12. A complete inventory including, but not limited to:
    - a. Batches or lots of useable marijuana;
    - b. Batches or lots of concentrates;
    - c. Batches or lots of extracts;
    - d. Batches or lots of marijuana infused products;
    - e. Immature plants,
    - f. Mature plants;
    - g. Marijuana waste; and
  13. Any other information or technical functions DBR deems appropriate

Upon completion of all training, each recipient will sign a statement attesting to receipt of the training and acknowledging the date, time and place he or she received said training, topics discussed, and the name and title of presenters in accordance with Section G.E.3 of the Regulation. Refer to Appendix E for a sample Training Attestation.

Please refer to Appendix A for marketing, training and compliance collateral provided by [REDACTED]

### **South County Compassion Tracking System Policy:**

Upon direction by the DBR and in accordance with R.I. Gen. Laws §§ 21-28.6- 12(g)(3), and 21-28.6-16(d) South County Compassion will utilize the state approved Medical Marijuana Program Tracking System to document and monitor compliance with the Act and all regulations promulgated . South County Compassion will pay costs associated with use of the Medical Marijuana Program Tracking System.

- All information related to the acquisition, propagation, cultivation, transfer, manufacturing, processing, testing, storage, destruction, wholesale and/or retail sale of all marijuana and medical marijuana products possessed by South County Compassion and/or distributed to registered cardholders in accordance with the Act will be kept completely up-to-date [REDACTED] including but not limited to:

- Planting and propagation of plants;
  - Transition of immature to mature plants;
  - Harvest dates with yield documentation;
  - Destructions of immature plants, mature plants and medical marijuana products;
- Transportation of immature plants, mature plants, and medical marijuana products;
- Theft of immature plants, mature plants, and medical marijuana products;
- Adjustment of product quantities and/or weights;
- Conversion of product types including waste documentation;
- Required test results as reported by a cannabis testing laboratory;
- Retail and wholesale transaction data;
- Product compliance data;
- A complete inventory including, but not limited to:
  - Batches or lots of useable marijuana;
  - Batches or lots of concentrates;
  - Batches or lots of extracts;
  - Batches or lots of marijuana infused products;
  - Immature plants,
  - Mature plants;
  - Marijuana waste; and Any other information or technical functions DBR deems appropriate.

**Refer to Appendix A, Leaf Logix Informational Material**

**Dispensing and Sales Transactions Overview**

South County Compassion’s Chief Operating Officer will implement policies and procedures to ensure all dispensing and sales transactions are to registered qualifying patients, primary caregivers, authorized purchasers and verified out-of-state patient cardholders. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

South County Compassion has developed a detailed patient intake procedure which

may be referred to in Appendix C. [REDACTED]

## **South County Compassion Dispensing and Sales Transactions Policy:**

South County Compassion's sales to qualifying patients or authorized purchasers, are only permitted if those qualifying patients or authorized purchasers are registered and compliant with R.I. Gen. Laws Chapter 21-28.6 entitled, "The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act," as amended and all regulation promulgated thereunder. Only marijuana products that have been designated as medical marijuana in accordance with § 1.7 of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation may be sold or distributed. For such sales, South County Compassion will be strictly bound by the dispensing limits set forth in R.I. Gen. Laws § 21-28.6-12(g).

### **Sales to Out-of-State Patients**

South County Compassion may conduct sales to out-of-state patient cardholders in accordance with R.I. Gen. Laws § 21-28.6-4(o), provided the receiving or purchasing patient has a valid medical marijuana card, or its equivalent, which has been issued by the applicable regulating authority for the medical marijuana program of the issuing U.S. state/jurisdiction/territory. The patient must also possess and present valid government issued identification matching the name on their medical marijuana card.

Each patient verified pursuant to § 1.6.3(E)(2)(a) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation, shall complete an intake form (upon a form acceptable to DBR) which includes at minimum the home state card registration number (or if the home state registration number is not available, a unique identifier assigned by South County Compassion).

South County Compassion will log and track all transactions with each out-of-state patient cardholder in the Medical Marijuana Program Tracking System according to the issuing state's patient card registration number or the unique identifier assigned to that person by South County Compassion.

Out-of-state patient information shall be maintained confidentially in accordance with § 1.6.6(D)(2) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation .

South County Compassion will provide each out-of-state patient cardholder with a notice regarding the requirements and prohibitions under the Act and any regulations promulgated thereunder that apply to dispensing and use of medical marijuana within the State of Rhode Island, including without limitation notice of medical marijuana dispensing and possession limits, prohibition of taking medical marijuana and medical marijuana products across state lines and

prohibition of smoking in public places.

Sales for delivery to a qualifying patient cardholder's residence are deemed permitted provided that such sales comply with § 1.6.9 of this Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation

## Reference Appendix C - Patient Intake Procedure

### Limits for Usable Marijuana and Marijuana Product Equivalency Limits

[REDACTED]  
[REDACTED] South County  
Compassion will set the purchase limits to the limits set by the Act, 2.5 ounces in any 15 day period. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] The seed-to-sale system will not allow a sale to be completed if the sale would be in excess of limits [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Marijuana Flower Weight	Equivalent Number of 10mgs of THC Single Serving Units
5 ounces	415 THC single serving units
2.5 ounces	125 THC single serving units
1 ounce	83 THC single serving units
.25 ounces	21 THC single serving units
1 gram	3 THC single serving units

Marijuana Flower Weight	Equivalent Concentrate grams of
5 ounces	38.5 grams
2.5 ounces	19.25 grams
1 ounce	7.7 grams
.25 ounces	1.9 grams
1 gram	0.3 grams
Wet Flower Weight	Dry Flower Weight (20% of Wet Flower Weight)
50 ounces	10 ounces
37.5 ounces	7.5 ounces
25 ounces	5 ounces
12.5 ounces	2.5 ounces

### **Voluntary and Involuntary Recalls**

DBR or DOH may require South County Compassion to recall any marijuana or marijuana product that it has sold or transferred upon a finding that circumstances exist that pose a risk to public health, safety and welfare.

- a. The recall will be initiated by South County Compassion immediately as determined by their approved recall plan; and
- b. South County Compassion will comply with any additional instructions made by DBR.

A recall may be based on, without limitation, evidence that the marijuana, marijuana product, or medical marijuana product:

- a. Contains unauthorized pesticide(s);

- b. Failed a mandatory test and was not mitigated pursuant to testing protocols;
- c. Is contaminated or otherwise unfit for human use, consumption or application;
- d. Is not properly packaged or labeled;
- e. Was not cultivated, processed or manufactured by a licensee or otherwise is not in accordance with the The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act, as amended, DBR regulations or DOH regulations; or
- f. Otherwise poses a threat to public health or safety as determined by DBR or DOH.

DBR may at any time require the destruction of medical marijuana product or marijuana product upon a finding that circumstances exist that pose a risk to public safety and health.

If DBR finds that a recall is required, DBR:

- a. Must notify the public and licensees of the recall;
- b. Must affect an administrative hold on all affected medical marijuana and/or medical marijuana products in the tracking system;
- c. May require South County Compassion to place all marijuana, marijuana product, medical marijuana and medical marijuana product in quarantine itself or with a third-party custodian at SCC's expense.
- d. May require South County Compassion to notify all individuals to whom such medical marijuana or a medical marijuana product was sold; and
- e. May require that South County Compassion destroy the recalled product.

## **Refer to Appendix E: Recall Plan**

### **Product Inspection, Quarantine Protocols and Procedure**

South County Compassion takes care to ensure that all medical marijuana and medical marijuana product inventory is effectively and compliantly managed. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

Guidance for ensuring the prevention of the entrance of defective and/or contaminated cannabis flower or products/materials into South County Compassion facilities is as follows:

a. Receipt procedures

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**Inspection for contaminants**

[Redacted]



[REDACTED]

In the event that marijuana or marijuana product(s) are found to be outdated, damaged, deteriorated, mislabeled, or contaminated, SCC will immediately quarantine the marijuana or marijuana product(s) from other marijuana, and destroy the marijuana or marijuana product(s) in accordance with the Regulations.

Quarantine procedure:

[REDACTED]

- Quarantined products will be held until further direction is given by DBR to either retest, remediate, or destroy the quarantined product(s).

**South County Compassion Safe Disposal of Medical Marijuana Waste and Safe Destruction of Usable Medical Marijuana**

South County Compassion’s Compliance Officer will ensure that the disposal of medical marijuana waste and destruction of usable medical marijuana are performed in compliance with the Regulations. Marijuana and marijuana product waste, including but not limited to, all liquid,

chemical, hazardous, pesticide, manufacturing solvent and chemical waste containing any traces of marijuana) will be stored, secured, and managed in accordance with all applicable federal, state, and local statutes, regulations, ordinances, or other legal requirements.

Prior to disposal, marijuana and marijuana product waste will be made unusable and any marijuana plant material made indistinguishable from other plant material. This will be accomplished by grinding and incorporating the marijuana plant waste with other non-consumable solid waste or other ground materials, so the resulting mixture is at least 50% non-marijuana waste by volume. Other methods to render marijuana waste unusable will be approved by DBR before implementing. Marijuana waste rendered unusable following an approved method may be delivered to a licensed solid waste disposal facility in Rhode Island for final disposition or disposed of in an alternative manner approved by DBR. C. Destruction of marijuana and marijuana materials other than waste generated in the regular course of processing and/or manufacturing (such as destruction of whole plants, wet, or usable marijuana that are found to be in excess of statutory possession limits or destruction of a contaminated batch of medical marijuana product) will be in a manner acceptable to DBR, which may include consultation with law enforcement.

Destruction of marijuana and marijuana materials upon revocation or abandonment of the license will be specifically governed by DBR order or agreement and/or coordinated efforts with law enforcement.

South County Compassion will maintain accurate and comprehensive records regarding waste material that accounts for, reconciles, and evidences all waste activity related to the disposal of marijuana and marijuana products (including any waste material produced through the trimming or pruning of a marijuana plant prior to harvest). DBR may mandate storage of any such records or summaries of such records to be through the Medical Marijuana Program Tracking System or any other electronic system DBR designates.

All actions in compliance with § 1.6.16 of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation must comply with any applicable DEM laws, regulations or policies.

## **Records retention policies**

### Personnel Records

[REDACTED]

[REDACTED]

- Additional Records to be Maintained

[REDACTED]

All records maintained by South County Compassion which pertain to one or more registered qualifying patients, registered primary caregivers or authorized purchasers will be:

- Considered confidential health care information under applicable Rhode Island

- law; and
- Protected as health care information in accordance with the Federal Health Insurance Portability and Accountability Act of 1996, as amended.

#### Records Storage and Responsibility for Loss of Records and Data

- Records pertaining to transactions occurring within the last six (6) months shall be stored on the licensed premises. Records dating further back may be stored off the premises with DBR’s approval.
- South County Compassion will exercise due diligence and reasonable care in preserving and maintaining all required records to guard against loss of records and data, including cybersecurity of electronically-maintained records.

#### **Ethics and Compliance policies.**

**See Appendix H - Ethics and Compliance Policy**

#### **Alcohol and drug free workplace policy**

#### **Drug and Alcohol Policy**



#### **Work Rules**

#### **South County Compassion prohibits:**

The use, unauthorized distribution, unauthorized manufacture, unauthorized transfer, unauthorized sale, unauthorized purchase or unauthorized possession of any controlled substance, illegal drug, intoxicant, drug paraphernalia or alcohol, or the improper use of prescription medication while on South County Compassion premises or work sites, using South County Compassion property –

including SCC vehicles and private vehicles parked on South County Compassion premises or work sites – or at any time while conducting South County Compassion business (except alcohol available at South County Compassion-sponsored functions with the approval of Management)

Employees from reporting to work or performing their duties while under the influence of a controlled substance or alcohol, or while abusing prescription medication.

This policy does not prohibit employees from the lawful possession and responsible, safe use of prescribed medications. Employees have the responsibility to consult with their doctors or other licensed health care professionals about the effect of prescribed medications on their ability to perform their specific job duties in a safe manner, and to promptly disclose any work restrictions to their supervisors or Human Resources. Employees should not, however, disclose underlying medical conditions, impairments or disabilities to their supervisors or Human Resources unless specifically directed to do so by their doctors or other licensed health care professionals.

### **Voluntary Requests for Assistance**

Employees with drug and alcohol problems are encouraged to seek help before they become subject to discipline for violating this or other South County Compassion policies. South County Compassion will support, assist, and accommodate such employees to the extent required by applicable law. Human Resources can assist employees in a confidential manner, by referring them to the Employee Assistance Program, providing them with information about other community resources for evaluation, counseling, and treatment and helping them utilize any available employee benefits. Employees will not be disciplined by the South County Compassion because they request assistance. Employees may not, however, escape discipline by requesting assistance after they violate the South County Compassion's policies. In addition, employees who request assistance will not be excused from complying with the South County Compassion's policies, including its standards for employee performance and conduct.

### **Consequences**

Employees who violate this policy will be subject to appropriate disciplinary

action up to and including termination of employment. Depending on the circumstances, an employee's return to work, reinstatement and/or continued employment may be conditioned on the employee's successful participation in and/or completion of any and all evaluations, counseling, treatment, and rehabilitation programs, passing of return-to-duty and follow-up drug and alcohol tests, and/or other appropriate conditions as determined by the South County Compassion.

## **Testing**

South County Compassion reserves the right to conduct reasonable suspicion and other drug and alcohol tests in accordance with the requirements of applicable law.

## **Reporting Convictions**

Employees who are convicted of, plead guilty to (including a plea of nolo contendere or no contest), or are sentenced for a crime involving illegal drugs must report the conviction, plea or sentence to Management within five (5) days after such conviction, plea or sentence. If an employee who is convicted of, pleads guilty to or is sentenced for a crime involving illegal drugs performs work directly relating to the South County Compassion's contracts, permits, or grants with a state or the federal government, the South County Compassion will report such conviction, plea or sentence to the appropriate agency within ten (10) days after it receives notice.

## **Employee Assistance Program**

When there is reason to believe that an employee has a substance or alcohol abuse problem that interferes with his or her ability to perform the essential functions of the job, the South County Compassion may, at its discretion, refer the employee to the Employee Assistance Program for counseling or to a substance abuse rehabilitation facility, as appropriate. An employee's refusal to comply with recommendations to seek assistance may be further grounds for disciplinary action, including termination of employment, consistent with applicable law.

## **Odor Control and Mitigation**

All South County Compassion cultivation, manufacturing, packaging and any

other area(s) deemed necessary by DBR will have ventilation and filtration systems installed that prevent medical marijuana plant odors from exiting the interior of the structure to an extent that would significantly alter the environmental odor outside, while addressing the potential for mold.

[REDACTED]

## **Refer to Appendix F - Odor Control and Mitigation Plan**

### **Pesticides**

South County Compassion's Chief Operating Officer will implement policies and procedures related to the use of pesticides by any SCC agent or employee. [REDACTED]

[REDACTED]

South County Compassion will maintain strict compliance with Policies and Procedures for pesticide use requirements for compassion centers promulgated by the Department of Business Regulation pursuant to R.I. Gen Laws 21-28-6-12(f)(11) and 21-28-6-16(g).

[REDACTED]

The use of pesticides on marijuana plants in Rhode Island by South County Compassion will not

be considered a violation of these regulations provided that the products satisfy all of the following criteria:

- The product must be a “minimum risk pesticide” under 40 C.F.R. §152.25(f), incorporated above at § 1.1.7(C) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation
- The product must be labelled for use on all plants, other plants, bedding plants, unspecified plants, or unspecified crops.
- The label must not prohibit indoor or greenhouse use, as applicable.
- All active ingredients must be eligible for food use as determined by the federal Environmental Protection Agency’s list of (EPA) Active Ingredients Eligible for Minimum Risk Pesticide Products, incorporated above at § 1.1.7(D) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation . <https://www.epa.gov/sites/production/files/2015-12/documents/minrisk-active-ingredients-tolerances-2015-12-15.pdf>
- All inert/other ingredients must be eligible for food use in accordance with EPA’s Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products, incorporated above at § 1.1.7(E) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation. [https://www.epa.gov/sites/production/files/2016-11/documents/minrisk\\_inert\\_ingredients\\_w\\_tolerances\\_2016-11-16.pdf](https://www.epa.gov/sites/production/files/2016-11/documents/minrisk_inert_ingredients_w_tolerances_2016-11-16.pdf).
- The product must be a currently registered pesticide product eligible for sale in Rhode Island as determined by DEM. To verify a product’s registration in Rhode Island, please consult the online National Pesticide Information Retrieval System through the Center for Environmental and Regulatory Information Systems. [http://npirspublic.ceris.purdue.edu/state/state\\_menu.aspx?state=RI](http://npirspublic.ceris.purdue.edu/state/state_menu.aspx?state=RI).
- The product must be used in accordance with any and all use instructions on the label.

No application of pesticides shall be made after the vegetative stage of growth of the cannabis plant. The vegetative stage of growth should be determined by visual buds or flower or by proxy of the plant receiving less than eighteen (18) hours of light in a twenty-four (24) hour period.

Pesticides will be identified, held, stored and disposed of in a manner that protects against contamination of medical marijuana and marijuana products and in a manner that is in accordance with any applicable local, state, or federal law, rule, regulation, or ordinance.

As a DBR record-keeping requirement, South County Compassion will keep detailed records of any pesticide products used and application regiments, including video recording during pesticide applications which must cease if there is a failure or disruption of the video surveillance system. This record-keeping requirement is independent of that required of commercial pesticide applicators by DEM and is intended to apply in addition to that



requirement, where relevant.

## **Outreach Activities**

South County Compassion recognizes the importance of patient outreach and the pivotal role that it plays in patient education and the continued expansion of the medical marijuana program in Rhode Island. As such, SCC will maintain a public presence, performing outreach activities in the community on a regular basis. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **South County Compassion Patient Outreach Policy:**

South County Compassion's outreach activities to registered qualifying patients, registered primary caregivers, and authorized purchasers will, at a minimum, include:

- Providing each new registered qualifying patient who visits South County Compassion with a frequently asked questions sheet that explains the limitations on the right to use medical marijuana under state law in accordance with R.I. Gen. Laws § 21-28.6-12(f)(9);
- Providing a list of ingestion options for usable marijuana;
- Providing applicable usage techniques and any corresponding safety information to registered qualifying patients;
- Communicating potential side effects; and
- Upon the request of DOH and/or DBR, e-mailing or otherwise disseminating information to SCC clients regarding changes in the medical marijuana program, or disseminating customer surveys.

## **Appendix G - Patient Handbook**

### **Complaints**

South County Compassion takes patient complaints - and customer satisfaction - seriously. SCC has standardized our complaint format [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

### **Safe Dispensing of Medical Marijuana**

South County Compassion takes patient identification and validation seriously. Only patients, caregivers, and authorized purchasers who display a valid, unexpired, state-issued identification, as well as a valid medical marijuana license will be permitted into SCC's facilities.

South County Compassion's sales to qualifying patients, directly or through their caregivers or authorized purchasers, are only permitted if those qualifying patients, caregivers, or authorized purchasers are registered and compliant with R.I. Gen. Laws Chapter 21-28.6 entitled, "The Edward O.Hawkins and Thomas C. Slater Medical Marijuana Act," as amended and all regulation promulgated thereunder. Only marijuana products that have been designated as medical marijuana in accordance with § 1.7 of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation may be sold or distributed. For such sales, South County Compassion will be strictly bound by the dispensing limits set forth in R.I. Gen. Laws § 21-28.6-12(g).

### **Sales to out-of-state patients**

South County Compassion may conduct sales to out-of-state patient cardholders in accordance with R.I. Gen. Laws § 21-28.6-4(o), provided the receiving or purchasing patient has a valid medical marijuana card, or its equivalent, which has been issued by the applicable regulating authority for the medical marijuana program of the issuing U.S. state/jurisdiction/territory. The patient must also possess and present valid government issued identification matching the name on their medical marijuana card.

Each patient verified pursuant to § 1.6.3(E)(2)(a) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation, shall complete an intake form (upon a form acceptable to DBR) which includes at minimum the home state card registration number (or if the home state registration number is not available, a unique identifier assigned by South County Compassion).

South County Compassion will log and track all transactions with each out-of-state patient cardholder in the Medical Marijuana Program Tracking System according to the issuing state's patient card registration number or the unique identifier assigned to that person by South County Compassion.

Out-of-state patient information shall be maintained confidentially in accordance with § 1.6.6(D)(2) of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation .

South County Compassion will provide each out-of-state patient cardholder with a notice regarding the requirements and prohibitions under the Act and any regulations promulgated thereunder that apply to dispensing and use of medical marijuana within the State of Rhode Island, including without limitation notice of medical marijuana dispensing and possession limits, prohibition of taking medical marijuana and medical marijuana products across state lines and prohibition of smoking in public places.

Sales for delivery to a qualifying patient cardholder's residence are deemed permitted provided that such sales comply with § 1.6.9 of this Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation

## **Reference Appendix C - Patient Intake Procedure**

### **Packaging and Labeling**

South County Compassion will maintain strict compliance with retail-ready marijuana product packaging and labeling requirements for compassion centers promulgated by the Department of Business Regulation pursuant to R.I. Gen Laws

21-28-6-12(f)(11) and 21-28.6-16(g). [REDACTED]

[REDACTED]

SCC recognizes the importance of compliant, safe retail marijuana packaging. SCC's Chief Operating Officer will be responsible for all functions related to packaging and labeling. [REDACTED]

[REDACTED]

SCC's Packaging and Labeling Manager will oversee the Packaging and Labeling Department, ensuring that all internally packaged retail-ready marijuana products meet all packaging and labeling requirements. [REDACTED]

### **Packaging**

- SCC will ensure all retail-ready medical marijuana products are in compliant packaging upon entering the compassion center retail sale space.

[REDACTED]

- Exit Package
  1. Except for medical marijuana edibles and ingestibles, upon DBR approval, any other retail-ready medical marijuana product placed into a container that is not child-resistant will be placed into a child-resistant Exit Package at the point of sale.
- Additional Requirements for South County Compassion **Retail-Ready Medical Marijuana Edibles**
  1. A single serving size will not exceed ten (10) milligrams of active THC.
  2. When selling an individual single serving size unit, we will place the unit into a child-resistant container.

[REDACTED]

5. We will seal Medical Marijuana edibles in liquid form packaged as a singles serving size using a metal crown cork style bottle cap.

6. For Medical Marijuana Edibles in liquid form containing multiple serving units, the container will have a resealing cap or closure which maintains child resistance compliance.

7. Medical Marijuana Edibles in liquid form containing multiple serving units will include a measuring device such as a measuring cap, cup or dropper with the package containing the medical marijuana product.

**E. Packaging Requirements for South County Compassion Medical Marijuana Ingestibles**

1. When a single serving unit of a Medical Marijuana Ingestible is sold individually , it will be placed into a child resistant container.

[REDACTED]

6. All Medical Marijuana ingestibles in liquid for with multiple serving units will include within the packaging :
  - A measuring device such as a measuring cap, cup or dropper that is capable of dispensing a ten(10)mg serving unit
  - A “Hash Mark” on the package will not be used as a measuring device

**Additional Packaging Requirements for Retail Ready Medical Concentrates for SCC**

- Cartridges and any other devices, as determined by the DBR, shall receive a consumer testing certificate which is subject to DBR review.
- Electronic vaporization devices will have internal and external temperature controls to prevent combustion and have heating elements made of inert material.
- The total THC per package will not exceed 500 mgs.

**Labeling Requirements for SCC**

1. Each package containing retail ready medical marijuana products at SCC will be labeled with all required information pursuant to 1.5 of Rules and Regulation Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation before being sold to a registered patient, registered primary caregiver or authorized purchaser.
2. Labeling text will be:

- No smaller than size 6 font, unless otherwise specified.
  - In Times New Roman, Calibri, Arial, Helvetica or any other font determined by DBR to be easily read.
  - In black or white, unless otherwise specified.
  - Clearly written or printed in the English language.
  - In addition to the required English label, SCC may include an additional, accurate foreign language translation on the label that otherwise complies with these rules.
3. All required information will be unobstructed and conspicuous. When multiple labels are affixed to the packages none of the information required will be obstructed.
  4. Required information may be stated in a peel-back accordion, expandable, or extendable style so long as the label can be easily identified by a consumer as containing important information.
  5. All packages containing retail-ready medical marijuana products will be clearly labeled with the following information:
    - The business(s) or tradename(s) and licenses number(s) of the licensee(s) who produced the product;
    - South County Compassion or any trade name developed and our license number of SCC.
    - The unique identifier generated by the Medical Marijuana Program Tracking System;
    - Total THC and Total CBD as provided by a licensed cannabis testing laboratory ;
    - Upon request, SCC will disclose the name of the licensed cannabis testing lab that conducted the tests and provide the results of all required tests for any medical marijuana or medical marijuana product.
    - A DBR- selected universal warning symbol will appear on the front or most predominantly displayed area of the package, no smaller than one inch (1)by one inch (1).
    - Any Vape cartridges sole containing medical marijuana product will include the DBR-approved symbol in a manner that is clear and conspicuous;
    - When applicable, the recommended expiration date, or “use by”date;
    - Poison Control Contact Information :”American Association of Poison Control Center (800)222-1222”
    - For smokable and vapable products; the net weight of the medical marijuana product prior to its placement in the package, using a standard of measure compatible with the tracking system.
  6. **Additional Labeling Requirements for Retail-Ready Marijuana Infused Products for SCC:**
    - A. The total contents of THC and CBD will be stated per serving unit in milligrams (mgs), and in font larger than size 6, bolded, underlined and in red, so as to stand from surrounding text to the customer;

- B. Total contents of THC and CBD must be stated per package, in milligrams (mgs), in font larger than size 6, bolded, underlined and in red, so as to stand from surrounding text to the customer;
  - C. The serving size; and
  - D. The number of servings per package.
7. The following information may be placed on an insert but will accompany each retail-ready medical marijuana product sold:
- A. A complete list of all non organic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product;
  - B. For medical marijuana infused products, the net weight of the medical marijuana or medical marijuana product prior to its placement in a package, using a standard of measure compatible with the tracking system;
  - C. For the medical marijuana products consisting in whole or in part of marijuana flower or trim, the date of the harvest batch;
  - D. For medical marijuana products including concentrates and marijuana infused products that were manufactured, the date on which the manufacturing batch was created;
  - E. For the processed medical marijuana products, the processing technique or solvent(s) used to produce the product;
  - F. For processed medical marijuana products, a list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the medical marijuana product or that were added to the medical marijuana product;
  - G. For medical marijuana infused products, a list of all ingredients used to manufacture the marijuana infused product, including identification of any major allergens contained in the product in accordance with the Food Allergen Labeling and Consumer Protection Act of 2004, 21 U.S.C. § 343 (2010), specifically milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans;
  - H. For medical marijuana edibles and ingestibles, a nutritional fact panel in accordance with 21 C.F.R. Part 101, incorporated above at § 1.1.7(B) of compassion centers promulgated by the Department of Business Regulation pursuant to R.I. Gen Laws 21-28-6-12(f)(11) and 21-28-6-16(g)
  - I. For medical marijuana topicals, a list of all ingredients in descending order of predominance by weight or volume as applicable; and
  - J. For medical marijuana topicals, the amount recommended for use at any one time.

## **Universal Symbol**



As directed by DBR, unless deemed impracticable by DBR, each single a standardized serving unit of a medical marijuana infused product will be marked, stamped or otherwise imprinted with a DBR-selected universal symbol directly on at least one side of the medical marijuana infused product in a manner to cause the universal symbol to be distinguishable and easily recognizable. The universal symbol marking will:

1. Be centered either horizontally or vertically on each standardized serving of marijuana; and
2. If only imprinted on one-side, the imprinted side must be the front or most predominantly displayed area of medical marijuana infused product; and
3. If centered horizontally on a serving, the height and width of the universal symbol shall be of a size that is at least 25% of the serving's width, but not less than 1/4 inch by 1/4 inch; or
4. If centered vertically on a serving, the height and width of the universal symbol will be of a size that is at least twenty-five percent (25%) of the serving's height, but not less than 1/4 inch by 1/4 inch.

**Unless determined by DBR to be impractical, the following categories of marijuana infused product are considered to be per se practicable to mark with the universal symbol:**

- Chocolate;
- Soft confections;
- Hard confections or lozenges;
- Consolidated baked goods (e.g. cookie, brownie, cupcake, granola bar)
- Pressed pills and capsules.

## **WARNINGS**

- We will maintain strict compliance with Warnings on all retail-ready medical marijuana (and products) requirements for compassion centers promulgated by the Department of

Business Regulation pursuant to R.I. Gen Laws 21-28-6-12(f)(11) and 21-28.6-16(g). It is South County Compassions responsibility to ensure all retail ready medical marijuana products:

1. Be in the English language;
2. Be in Times New Roman, Calibri, Arial, Helvetica or any other font that can be easily read;
3. Be in text no smaller than size 8 font and bolded;
4. Not be covered or obscured; and
5. Be displayed in a bright yellow box as to stand out from other labeling requirements, unless otherwise stated.

**The following warnings will be displayed on all medical marijuana products at SCC, when applicable;**

- “Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”
- “Warning: It is unlawful to transport this product outside of Rhode Island.”
- “Warning: For medical use by a registered patient only. Not for resale.”

**For medical marijuana products intended to be smoked or vaporized:**

- “Warning: Smoking and Vaping is hazardous to your health.”
- “Warning; Vaping can expose you to toxic chemicals that may lead to death”.

**For all medical marijuana infused products, it must state in slightly larger or bolded font as to stand out from surrounding text, with priority placement,**

- “Effects of this product may be delayed by 3 or more hours.”

**For all topical products, it must state:**

- “For Topical Application – Do Not Eat or Smoke.”

-In addition to the warnings above, rotating warnings must accompany all retail- ready medical marijuana products at the point of sale.

**Rotating warnings will:**

- Be in the English language;
- Be in Times New Roman, Calibri, Arial, Helvetica or any other font that can be easily read;
- Be in text no smaller than size 10 font and bolded; and
- Not cover or obscure any required information pursuant to § 1.5 of Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation.
- Accompany all retail-ready medical marijuana products at the point of sale

based on a rotating schedule as determined by DBR.


**South County Compassion will post any additional warnings at the point of sale as determined by DBR.**

**See Appendix I - Examples of Proposed Packaging**

**SCC Protocols and Policies for Transportation of Medical Marijuana Product**

South County Compassion intends to regularly transport medical marijuana products. SCC will transport medical marijuana while performing home delivery services, as well as in the process of obtaining wholesale products from Cultivators licensed by the Department of Business Regulation located within the state, or transporting products from SCC's production facility. SCC recognizes the importance of safety and security throughout the transportation process, and has developed policies and procedures with these points in mind.



- 
- South County Compassion will maintain strict compliance with the Transportation of Medical Marijuana Products for compassion centers promulgated by the Department of Business Regulation pursuant to R.I. Gen Laws 21-28-6-12(f)(11) and 21-28-6-16(g).

### **Authorized Transport Vehicle**

1. SCC will ensure Authorized transports will be conducted in such a manner that marijuana and marijuana products are secured and safe at all times during transport.
2. SCC will ensure our “authorized transport vehicle” will be in compliance and at all times be meeting all the following criteria:
  - The vehicle bears no markings that indicate that the vehicle is being used to transport marijuana nor indicates the name of the marijuana establishment licensee;
  - The vehicle is equipped with a global positioning system monitoring device that is monitored by the originating marijuana establishment licensee during an authorized transport;
  - The vehicle is equipped with an alarm system;
  - The vehicle is equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for storage of marijuana products;
  - Marijuana products will not be visible from outside the vehicle;
  - Marijuana products will be stored and transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products. However, the trunk of a vehicle does not qualify as a “locked storage compartment.”

3. When transporting marijuana products, SCC will have no other products transported or stored in the same vehicle.
4. SCC will have a strict firearms policy, this will be included in our transportation SOPs, no firearms will be located within the vehicle or on the person of the authorized transport cardholder.
5. Any other security and safety requirements as determined by DBR.

### **Transport Manifests**

SCC will create and maintain detailed transport manifests for all authorized transports, which DBR may require be generated through and/or maintained in the Medical Marijuana Program Tracking System.

The detailed transport manifest will be prepared by the originating marijuana establishment licensee and transmitted in advance to the receiving license. Mediflor partnering licensees will retain copies of detailed transport manifests as part of their record retention responsibilities.

The detailed transport manifest will include the following minimum information:

- Departure date and approximate time of departure.
- Names, location addresses, and registration/license numbers of the originating and receiving marijuana establishment facilities.
- Unique identifier generated by the Medical Marijuana Program Tracking System.
- Product names or descriptions.
- Quantities (by weight or unit) of each product to be delivered.
- Product name or descriptions and quantities (by weight or unit) of each product which was received by the marijuana establishment licensee.
- Arrival date and approximate time of arrival.
- Delivery vehicle make, model and license plate number.
- Names, registry identification card numbers, and signatures of the authorized transport cardholders.

### **Authorized Transportation Requirements**

1. When SCC is the originating marijuana establishment licensee shall ensure that all delivery times and routes are randomized.

2. When SCC is the originating marijuana establishment licensee we will ensure that all transport routes remain within the state of Rhode Island.
3. SCC Authorized transports may only be made by authorized transport cardholders affiliated with the particular marijuana establishment licensee that is the source or recipient party to an authorized transaction.
4. When using one SCC authorized transport vehicle, the vehicle shall be operated/occupied by a minimum of two authorized transport cardholders and at least one such cardholder shall remain in the authorized transport vehicle at all times until the vehicle returns to the originating marijuana establishment licensee.
5. When two authorized transport vehicles, the authorized transport vehicles shall travel together at all times during the authorized transport and each vehicle shall be operated/occupied by at least one authorized transport cardholder. These vehicles shall not be left unattended for any period of time during any authorized transportation.
6. During all SCC authorized transports:
  - a. The authorized transport cardholders must have on their persons their compassion center registry identification cards and the detailed transport manifest; and
  - b. A copy of the detailed transport manifest shall also accompany the marijuana and marijuana products in the locked storage compartment of the authorized Mediflor transport vehicle.
7. Any and all SCC authorized transport vehicles carrying marijuana and marijuana products shall travel directly from the originating marijuana establishment licensee to the receiving marijuana establishment licensee.
8. In case of an emergency stop, SCC will immediately prepare a detailed written account that must be maintained describing the reason for the event, the duration, the location, any activities occurring during the stop, and any personnel exiting the vehicle during the stop.
9. Prior to leaving the originating marijuana establishment licensee for an

authorized transport to another marijuana establishment licensee, the originating marijuana establishment licensee must weigh, inventory, and account for on video all marijuana and marijuana product to be transported.

10. SCC will ensure authorized transports to and from a marijuana establishment licensee, the transport manifest will be accompanied by a copy of any contract/purchase order for which the transport is being made and documentation of the actual payment date, if prepaid.

11. SCC will ensure Upon arrival at the destination marijuana establishment licensee, the Receiving party shall confirm receipt of each item in the presence of the delivering authorized transport cardholder and then initial each received line item on both the originating licensee's manifest and the receiving licensee's manifest. The receiving party shall then immediately re-weigh, re-inventory, and account on video for all marijuana and marijuana product transported.

12. SCC will make certain Both the originating and recipient marijuana establishment licensees shall timely adjust their records to reflect in its records the completed authorized transport of marijuana, including logging such information in the Medical Marijuana Program Tracking System. All records and entries in the Medical vMarijuana Program Tracking System shall be easily reconciled by unique identifier, product name and quantity, with the applicable detailed transport manifest.

13. In the case that SCC finds any unusual discrepancies in the quantity described in the detailed transport manifest and the quantities received will be reported to DBR and municipal and/or state law enforcement within twenty-four (24) hours.

14. In the case of any vehicle accidents, diversions, or losses during authorized transports of marijuana SCC shall report to DBR and law enforcement as an "emergency event" pursuant to § 1.6.5(l) of requirements for compassion centers promulgated by the Department of Business Regulation pursuant to R.I. Gen Laws 21-28-6-12(f)(11) and 21-28.6-16(g)

15. Transportation to or from a third-party testing provider shall be in accordance with the DOH Testing Regulations.

## **Patient feedback and product selection**

SCC recognizes the importance of patient feedback in better serving patients' needs. [REDACTED]

[REDACTED]

[REDACTED] [info@southcountycompassion.org](mailto:info@southcountycompassion.org)

[REDACTED]

[REDACTED]

[REDACTED]

**Other services to be provided** - South County Compassion takes a holistic approach to care for its patient base. SCC recognizes that physical and mental health are as important as therapy with medical marijuana. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Advertising:**

South County Compassion recognizes the importance of taking care in advertising practices. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED] SCC has designed policies and procedures to ensure all advertising and marketing practices are performed in a compliant manner.



- South County Compassion will not advertise in a manner which is observed by or targets the general public. All advertising will be restricted to a registered patient audience.
- In the course of promoting SCC's brand, medical marijuana or medical marijuana products, SCC will not advertise or cause any advertising or agent to advertise in a manner that:
  - Is attractive to persons under twenty-one (21) years of age;
  - Promotes non-medical use;
  - Promotes activity that is illegal under Rhode Island law;
  - Is contrary to or in direct violation of state or federal consumer protections; or
  - Otherwise presents a significant risk to public health and safety.
- Any advertising by or on behalf of South County Compassion will not:
  - Contain statements that are deceptive, false or misleading;
  - Display images or representations of marijuana plants, marijuana or marijuana products;
  - Display the consumption, use or transfer of marijuana or marijuana products;
  - Include claims related to potency (beyond listing of cannabinoid content);
  - Include any prices or the term "sale," "discount," "coupon," "special" or similar terms;
    - SCC's website may include prices of product and reference to services offered for discounted products
    - Product Menus available to patients once in South County Compassion may show prices as well.
  - Depict activities or persons in conditions under the influence of marijuana, including but not limited to operating a motorized vehicle, boat or machinery, or persons who are pregnant or breastfeeding;
  - Contain any content that can reasonably be considered to target individuals under the age of twenty-one (21), including but not limited to
    - images of persons under twenty-one (21) years of age
    - cartoons, toys or similar images and items typically marketed towards persons under twenty-one (21) years of age or
    - references to products that are commonly associated with persons under twenty-one (21) years of age or marketed to persons under twenty-one (21) years of age;
    - contain any imitation of candy advertising
    - include the term "candy" or "candies"
  - Encourage the transportation of marijuana or marijuana products across state lines or otherwise encourage illegal activity;
  - Assert that marijuana or marijuana products are safe because they

are regulated by DBR or have been tested by a testing facility or otherwise make claims that any government agency endorses or supports marijuana;

- Make claims that marijuana has curative or therapeutic effects;
  - Contain any health or physical benefit claims, including but not limited to health or physical benefit claims on labels or packaging; or
  - Contain material that encourages excessive or rapid consumption.
  - Make any deceptive, false or misleading assertions or statements on any informational material, any sign or any document provided to a patient, registered caregiver or authorized purchaser;
- 
- South County Compassion will not:
    - Distribute handbills in public areas or on publicly owned property;
    - Advertise within the prohibited distance of one thousand (1,000) feet (or such greater distance if prescribed by the municipality in which the advertising is located) of the property line of an existing public or private school;
    - Advertise on television, radio, or print media;
    - Advertise in any manner that is viewable or can otherwise be perceived in a public space, including but not limited to billboards, bus wraps, benches, adopt a highway signs, or any format that may be viewable from roads or walkways;
    - Engage in advertising via marketing directed towards location-based devices or electronic devices, including but not limited to cellular phones, unless the marketing is a mobile device application targeted to a registered patient audience and not a public audience, and that is installed on the device by the owner of the device who is a registered patient and includes a permanent and easy opt-out feature;
    - Engage in any form of advertising which promotes application or enrollment into the program or the services of the practitioner or any other party which facilitates patient registration; or
    - Permit use of the South County Compassion's trademarks, brands, names, locations or other distinguishing characteristics for third-party use on advertising in a manner that does not comply with § 1.10 of this Part or any other statute, rule or regulation.
  - In the event a third party has used SCC's brand, trademark, brand name, location or other distinguishing characteristics in an advertisement that does not comply with § 1.10 of this Part or any other statute, rule or regulation, SCC will immediately notify DBR and issue a cease-and-desist notice to such third party.

- Digital, Electronic and Web-based Advertising
  - In addition to complying with the advertisement criteria and prohibitions outlined above, while advertising on a digital, electronic or web-based platform, SCC will:
    - Utilize appropriate measures to ensure that individuals visiting the platform are over twenty-one (21) years of age and are authorized to use and/or purchase listed products. If appropriate measures to ensure that individuals visiting the platform are over twenty-one (21) years of age are not available, SCC will not advertise on such a platform.
    - Not utilize unsolicited pop-up or banner advertising on the platform other than on age-restricted websites for people twenty-one (21) years of age and over who consent to view marijuana-related material.
- Required Statements on all Advertising
  - South County Compassion include the following statements on all advertising regardless of the medium:
    - "For use only by qualified patients"; and
    - The license number of SCC.

## Return Policy

SCC will accept medical marijuana product returns at its sole discretion, or at the direction of the Department of Business Regulation in the event of a product recall.

If the package's tamper seal is intact, and the product is not expired or otherwise unfit for sale, a full refund will be issued and the product will be returned to inventory for resale.

If the package's tamper seal is broken, and any amount of the product has been used, SCC's Retail Manager or Supervisors may, at their discretion, issue a full or partial refund in the form of store credit. As a guideline, if less than 1/4 of the package has been used, some type of refund is likely in order. However, if 90% of the package has been used, for instance, there is less reason for any amount to be refunded. In the case that a package is returned with its tamper seal broken, the product will be immediately quarantined in line with SCC's quarantine procedure, and destroyed in accordance with SCC's destruction procedure.

For each return, the patient will be required to fill out a Complaint Form, in line with our Complaint Procedure, in order for management to review weekly. Should the patient refuse to complete the form, the employee receiving the complaint will be responsible for ensuring necessary information is collected and aggregated according to SCC's Complaint Policy. Should the employee receiving the complaint believe that it warrants

immediate escalation to management, the employee may seek approval from their direct supervisor to escalate immediately. In the case that SCC finds evidence that the complaint may warrant a recall, SCC will immediately quarantine the batch and notify DPR through appropriate channels.

## **Proposed Medical Marijuana Varieties and Product Types proposed to be Offered**

South County Compassion will source medical marijuana and medical marijuana products primarily from the State's 60+ licensed cultivators.

A brief description of SCC's intended product offering is included below:

- Raw Cannabis Flower - Prepackaged raw cannabis flower, or "bud." Dried flower which may be smoked or vaporized
  - Sativa - Sativa is a primary marijuana strain type known to be energizing and cerebral. Sativa strains are ideal for activities during the daytime that require physical activity or a high level of social interaction. In terms of effects, sativa strains provide a high for your mind, jumpstarting creativity, focus and mental energy.
  - Indica - Indica is a primary marijuana strain type known to be calming and relaxing. Indica strains are ideal for activities during the evening that require little to no physical activity or social interaction. In terms of effects, indica strains provide a high for your mind and body, creating a sedated and sleepy state of mind.
  - Hybrid - Hybrids are a primary marijuana strain type that live between indicas and sativas. Hybrid strains are classified by their ability to produce a unique balance of indica and sativa effects. Hybrids can be both energizing and relaxing, depending on their specific strain lineage.
  - CBD Rich - The many benefits of CBD hemp flower that people have reported include relaxation, improved clear-mindedness, and more. It has been known to

provide a relaxing and “chill” experience without the more intense and intoxicating effects associated with its sister plant, marijuana.

- Prerolled joints - dried flower rolled in papers with or without a support/mouthpiece, or “crutch”
- Kief - mechanically separated extract from the cannabis plant. Kief is produced when dry flower is passed over a micron screen of an appropriate size. It is most often smoked, used to “top off” a bowl of flower or rolled into a joint.
- Bubble Hash - mechanically separated extract from the cannabis plant. Bubble hash is produced using ice and water to freeze trichomes (resinous glands containing cannabinoids) contained in material which can then be separated from plant material through agitation. Following filtration, the hash is collected and dried, and is most often smoked in a pipe or rolled into a joint.
- Live Rosin - Live rosin is resin extracted from flower, kief, or bubble hash that is “pressed” using heat and pressure to remove the essential oils contained within trichomes. The product is most often “dabbed” or vaporized.
- CO2 Shatter - CO2 shatter is extract that is produced utilizing supercritical fluid extraction using carbon dioxide. The oil is treated similarly to how hydrocarbon-extracted concentrates are treated, resulting in a product that is very tacky to the touch and extremely potent.
- Rick Simpson Oil (RSO) - A cannabis concentrate used for many different medical benefits, including relieving cancer symptoms. It has a thick, syrupy consistency and can be applied as a topical or ingested in food or drinks.
- Vape Cartridges - A vape cart is a glass cartridge pre-filled with a gram or half-gram of cannabis oil. This oil contain various combinations of cannabinoids and terpenes extracted from cannabis.
- Edibles - foods infused with activated cannabinoids.
  - Lozenges
  - Chocolates
  - Chews
  - Beverages

## **Pricing**

South County Compassion plans to maintain a pricing plan that strikes a balance between patient access and affordability and viability from a business standpoint.

[REDACTED]

[REDACTED]

[REDACTED]

### **Discounting**

South County Compassion recognizes that patients in the State come from all walks of life, social classes, and income levels. As such, SCC intends to adopt programs to offer discounted or free medical marijuana or medical marijuana products to patients who meet certain qualifying criteria. All patients will receive materials on discount qualification as part of their patient education materials (see Patient Handbook).

### **Covid19**

South County Compassion's COO will ensure strict compliance with all recommended or mandatory state and federal protocols, requirements and guidance with respect to the COVID-19 health pandemic. Providing a safe and sanitary environment for both employees and patients is SCCs top priority on a daily basis. The COO will conduct daily review of current and/or any new guidance provided by but not limited to;

- The DBR
- The Occupational Safety and Health Administration (OSHA)
- Commerce RIs website and;

- The Governors Executive Orders

[REDACTED]

**Notification to DBR of an Inventory Discrepancy**

South County Compassion will perform inventory reconciliations on a continual basis. These inventory reconciliations, in essence, will match up physical, on-hand inventory counts with stated values recorded in the Medical Marijuana Tracking System. In the event that during any inventory reconciliation, South County Compassion discovers a verified, unexplainable inventory discrepancy, SCC will immediately launch an internal investigation and promptly notify the Department of Business Regulation/Office of Cannabis Regulation of the inventory discrepancy's discovery.

[REDACTED]

**Emergency Alternative Tracking Procedures**

South County Compassion understands that the accurate, real-time tracking of all cannabis products is requisite to a transparent, compliant operation. In the event that South County Compassion is unable to access the Medical Marijuana Program Tracking system, SCC will employ alternative measures to ensure all information required by regulation is recorded in real-time. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Throughout the duration that SCC is unable to access the Tracking System, SCC will:

- a. Immediately conduct an initial comprehensive inventory of all medical marijuana, including usable marijuana available for dispensing and/or sale, marijuana plants and seedlings, unusable marijuana, and wet marijuana, at each authorized location on the date the compassion center first dispenses, or the licensed cultivator first cultivates medical marijuana or as of another date certain set by DBR.
- b. Conduct daily subsequent comprehensive inventories.
- c. Conduct a monthly inventory review of stored, usable marijuana, seedlings, plants, and wet marijuana.

## Appendices

Appendix A: Leaf Logix Informational Material

Appendix B: Patient Intake Form

Appendix C: Patient Intake Standard Operating Procedures

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Appendix D: Training Procedures

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**Appendix E - Recall Plan**

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**Appendix F - Odor Control and Mitigation Plan**

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**Appendix G - Patient Handbook**

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**Appendix H- Ethics and Compliance Policy**

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- Appendix I- Example of packaging
- Appendix J - Perimeter Lighting Plan
- Appendix K - Security Plan
- App

**Section 8 – Procedures for Safely Dispensing Medical Marijuana to Registered Qualifying Patients or Their Other Registered Primary Caregiver**

Procedures for safely dispensing medical marijuana only to registered qualifying patients, registered primary caregivers, and authorized purchasers, including procedures for verifying authenticity of registry identification cards and other forms of identification.

Security- External security, lighting, cameras, hourly security rounds (perimeter checks, etc.), regular monitoring of parking lot.

[REDACTED]

- [REDACTED]

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Refer to Appendix N - Building Layouts

**Intake Procedure - process of id check, first time patient(patient info, education)**

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**Product Safety -** [Redacted text block]

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Point of sale - packaging(warnings), limits, patient education at budtender level,

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HIPAA-

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**Appendix L - Proposed Pricing Grid**

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**Appendix M Traffic Study**

**Traffic and mitigation of community impact**

South County Compassion is committed to being a good neighbor in the community. SCC recognizes that traffic, odors, light pollution, noise pollution, and litter may have potentially negative impacts on South Kingstown and the surrounding communities. SCC has taken appropriate steps to ensure that any and all negative impacts on the community are appropriately mitigated.

[REDACTED]

Reference Appendix \_\_ Odor Control and Mitigation Plan

Light Pollution - Refer to Appendix P - Lighting plans and equipment specs

**Appendix N Building Layouts**

**Appendix O Incident Report**

**Date of Incident**

**Time of Incident**

**Reported By:**

**Details of Incident:**

**Reviewed By:**

**Submitted to DBR on:**

**Filed:**