

December 10, 2018

Caregiver and Patient Status Requirements for Certain Licensed Medical Marijuana Facilities

Pursuant to the Medical Marijuana Facilities Licensing Act (MMFLA), there are restrictions on certain employees, licensees and investors related to their registration with the state's Michigan Medical Marijuana Program.

The following persons may **not** be a registered primary caregiver but may continue to be a registered qualifying patient with the state of Michigan's Michigan Medical Marijuana Program:

- Processors: employees, licensees
- Growers: employees, licensees
- Secure Transporters: employees

[When a registered primary caregiver is hired as an employee of a grower, processor, or secure transporter, the individual shall withdraw registration as a registered primary caregiver.]

The following persons may **not** be a registered primary caregiver or a registered qualifying patient with the state of Michigan's Michigan Medical Marijuana Program:

- Secure Transporters: licensees, investors

These restrictions do not apply to employees, licensees, or investors of safety compliance facilities or provisioning centers.

Bureau of Marijuana Regulation (BMR) inspectors will ask for proof of card status withdrawal during an inspection of a licensed grower, processor, or secure transporter.

The MMFLA also requires the following that, until December 31, 2021, licensed growers and processors must have a minimum of 2 years' experience as a registered primary caregiver or employ someone who does. Until December 31, 2021, BMR inspectors will verify the designated person's caregiver experience during an inspection of a licensed grower or processor.

Any non-compliance with these requirements may result in failed inspections or sanctions, including, but not limited to, license denial, limitation, fines, revocation, suspension, nonrenewal, administrative holds, and orders to cease operations.

A complete copy of the Administrative Rules and additional information on BMR can be found at www.michigan.gov/bmr

For more information about LARA, please visit www.michigan.gov/lara