
Bulletin – Licensees’ preparation for COVID-19

To: Marijuana Establishments, Medical Marijuana Treatment Centers, and Certifying Health Care Providers
From: Shawn Collins, Executive Director
Date: March 13, 2020
Subject: COVID-19 (“Coronavirus”) State of Emergency

On March 10, 2020, Governor Charlie Baker declared a [State of Emergency in Massachusetts](#) to support the Commonwealth’s response to Coronavirus (“COVID-19”). The Cannabis Control Commission (“Commission”) is providing this bulletin to licensees and certifying health care providers for information and assistance.

Licensees are encouraged to review their standard operating procedures to ensure consistency with the Governor’s [State of Emergency](#) declaration and continued adherence to the State Sanitary Code. The Commission urges licensees to consider appropriate mitigating measures to ensure, preserve, and promote public health. In particular, the Commission urges licensees to review the Commonwealth’s COVID-19 Guidance and Recommendations for Businesses/Employers ([available here](#)), the Center for Disease Prevention and Control’s (“CDC”) Interim Guidance for Businesses and Employers ([available here](#)), and U.S. Department of Labor Occupational Safety and Health Administration’s (“OSHA”) Guidance on Preparing Workplaces for COVID-19 ([available here](#)). These publications advise employers to encourage good hygiene, urge employees to stay home when they feel sick and be flexible and considerate with sick leave benefits, amongst other precautions. Such guidance is important due to the potential for agents to handle marijuana and marijuana products during the cultivation and manufacturing processes, in addition to potential interactions with patients and adult-use customers, particularly those that are immunocompromised or otherwise vulnerable.

The Commission urges licensees to consider, evaluate, and appropriately publicize protocols relative to agent interactions with patients and customers. Relevant procedures include how establishments manage lines and queues, the utilization of mobile or order-ahead features that may reduce the risk of exposure, considering appointment-only operations, and the increased frequency of cleaning and sterilization efforts. Similarly, where applicable, Medical Marijuana Treatment Centers that offer patient delivery may consider the promotion and geographic expansion of their service and remind patients of the ability to acquire up to a 60-day supply.



At all times, licensees are required to follow standard operating procedures demonstrating compliance with the Commission's operational sanitary requirements. See [regulations](#) 935 CMR 500.101(1)(c)(10): Management and Operations Profile; 935 CMR 500.105(3)(b): Requirements for the Handling of Marijuana; and 105 CMR 590.000: State Sanitary Code, Chapter X – Minimum Sanitation Standards for Food Establishments. Licensees should also remain in touch with the local Board of Health in their host municipality to determine any further measures that may be necessary for ongoing operations.

Certifying health care providers are reminded that, pursuant to [935 CMR 501.010](#), patient renewal certifications may be submitted after telephonic consultation, so long as a clinical visit has occurred within the past year.

Finally, this bulletin specifically requests your patience with the Commission as we, too, implement many of the recommendations we are referencing and sharing. As many of our employees visit your facilities and interact with the public and your agents in the course of their day-to-day responsibilities, we appreciate your consideration of their health and wellbeing. We have recently directed many of our staff to work remotely and are currently evaluating our protocols with respect to inspections and the conduct of other business, including public meetings. We will undertake every effort to ensure there is minimal disruption to productivity while ensuring the safe operation of the Commission.

Licensees and certifying health care providers may contact the Commission at Commission@CCCMass.com regarding questions about this bulletin.

References

Governor Baker's State of Emergency, available at <https://www.mass.gov/executive-orders/no-591-declaration-of-a-state-of-emergency-to-respond-to-covid-19>.

COVID-19 Guidance and Recommendations for Massachusetts Businesses/Employers, available at www.mass.gov/info-details/covid-19-guidance-and-recommendations#for-businesses/employers.

CDC Interim Guidance for Businesses and Employers, available at https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fspecific-groups%2Fguidance-business-response.html.

OSHA Guidance on Preparing Workplaces for COVID-19, available at <https://www.osha.gov/Publications/OSHA3990.pdf>.

