



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

Memorandum

VIA E-MAIL

DATE: April 1, 2020

TO: Senator Peter Lucido, Chairperson, JCAR
Representative Matt Maddock, Alternate Chairperson, JCAR
Evan Keimach, Senate Majority Policy Office
Jimmy Biehl, House Republican Policy Office
Tim Reeves, Counsel, JCAR
Elizabeth Edberg, Counsel, JCAR

FROM: Marlon I. Brown, Director of Policy and Legislative Affairs *MB*

SUBJECT: Joint Committee on Administrative Rules (JCAR) Briefing Memo for Rule Set 2019-75 LR Marihuana Disciplinary Proceedings

Rules Primer

The general purpose of the proposed rules is to create and codify the agency's disciplinary proceeding system.

Summary of the Final Proposed Rule

The proposed rule set codifies the agency's disciplinary proceeding system for licensees who have been licensed under the Medical Marihuana Facilities Licensing Act (MMFLA) and the Michigan Regulation and Taxation of Marihuana Act (MRTMA).

Stakeholder Engagement

There was no specific engagement of stakeholders in the drafting of the pre-public hearing draft of the proposed rules.

Public Engagement and Public Hearing / Comment / Information

The public comment period began on February 2, 2020 and ended on February 17, 2020. The notice of public comment period, in addition to being posted in various newspapers as required, was distributed via email to interested parties signed up to receive such notices. The public hearing was held at the Marijuana Regulatory Agency, Jupiter Conference Room on February 12, 2020. There were no comments made in support or opposition to the proposed rules. There were minimal comments requesting modifications to the proposed rules.

Modifications Made Due to Public Comment

The proposed disciplinary action of a citation was removed from this rule set based upon public comment received by the agency. The provisions allowing the agency to discipline a licensee for not having a labor peace agreement were removed based upon the removal of those provisions from the Licenses rule set.

Significant Issues Not Incorporated in the Final Proposed Rules

Any provisions related to labor peace agreements, as it pertains to discipline, were removed from this rule set.

cc/att: Kim Gaedeke, Chief Deputy Director, LARA
 Adam Sandoval, Deputy Director, LARA
 Andrew Brisbo, Executive Director, MRA
 Elizabeth Arasim, Regulatory Affairs Officer, LARA