

February 9, 2021

South Dakota Department of Revenue  
445 East Capitol Avenue  
Pierre, South Dakota 57501

To Whom it May Concern,

In response to the request for an assessment of an accelerated timeframe for the implementation of a successful medical marijuana program, Cannabis Public Policy Consulting offers the following considerations.

Based on our experience with over 15 governments, the fastest timeline to create an effective, sustainable, and functioning medical marijuana system, without any existing licensing system, while balancing the need for patient access to safe marijuana with the need for public safety, preventing underage use and divergence into the illicit market, is between 14 to 20 months.

Medical marijuana systems are complicated to implement, as the formation and enforcement of the regulatory framework requires the involvement of multiple state agencies with shared responsibilities. In addition to state agencies, local governments with their own multiple agencies play pivotal roles in the establishment of a system, sharing concerns in public health and safety and implementing local procedures that best serve their communities. Furthermore, our experience shows that engaging patients and public health groups in the development of the regulatory framework is a necessary best practice.

Robust stakeholder engagement requires thoughtful, structured consideration that extends implementation timelines. In our experience, the most successful implementations of a regulated marijuana system have prioritized public education, stakeholder outreach, and consumer safety, all of which are difficult to accomplish in an accelerated timeline.