

REGULATORY GUIDE UNDERSTANDING THE MARKET FOR CANNABIS INSURAINPEDA2022

NAIC White Paper

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Drafted by the Cannabis Insurance (C) Workitigoup of the Property and Casualty Insurance (C) Committee



I. INTRODUCTION

The cannabis industry continues to evolve and expand both in structure and in the number of states with legalized cannabis. The National Association of Insurance Commissioners (NAIC) Cannabis Insurance (C) Working Group's original white paper adopted 9, Regulatory Guide Understanding the Market for Cannabis Insurarfoend there are substantial gaps in insurance coverage for the cannabis industry. While gaps remain, much has transpired since the writing of the original white paper. This white paper seeks to provide an update on activities and trends since the adoption of the previous white paper.

The original white paper focused on the cannabis industry's architecture, insurance needs and gaps, and insurance regulator best practices to encourage insurers to enter the market. The cannabis industry has become more sophisticated since the origin**tel pda**per was published in 2019. Ithas also continued to rapidexpand. The maturation and expansion of the cannabis market are driving new product development, infrastructure changeand the need for businesses provide ancillary services. It is in these areas where insurance gaps most persist. As such.001 Ton TJ 0.003 Tc -0.003 Tw 4g 01 (re)-1 (lu)10 (hdg)2 (ap)-4 0 0 12 72 e f* EMC BT /P453

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Cannabis sativa grows taller and more highly branched than the other two species nabis sativa alsogrows narrow leaves and tends to produce higher yields than cannabis rus derali Additionally, itcan produce high levels of THC composition.

Cannabis indica grows with short and dense branch structuces nabis indica generally has the shortest flowering period of the species Cannabis indica also produces higher yields than cannabis ruderalis and can produce high levels of ¹⁷HC.

Historically the terms indica and sativa were introduced in theth 13 century to define different species of cannabi⁴. Sativa was used to describe cannabis hemp plants, which were cultivated for plant fibers and seed⁴. Indica was used to describe intoxicating cabisa which was harvested for seeds and hashi⁴ hThe terms have been adapted to modeday usage by allowing sativa to refer to cannabis with energizing properties and indica to be synonymous with cannabis that relaxes the consumer.

Recently, scientists have discovered that the effects of a cannabis planta consumer result from cannabinoids and terpenes. Cannabinoids are various naturally occurring, biologically active chemical constituents of cannabis, including some that possess psychoactive persoperti Examples of cannabinoids include destaTHC, a chemical psychoactive component of cannabis, and CBDa non-psychoactive and antinflammatory chemical component. THC is one of many chemical compounds found in the resin secreted they glands of the cannabis plant. THC can stimulate cells in the brain to release dopamine, creating euphore for a consumption of the consump

- ⁸ ld.
- ⁹ ld. ¹⁰ ld.

⁶ Id.

⁷ ld.

¹⁰ IQ.

¹¹ CollectiveCannabis Education: Cannabis Strains: Indica, Sativa, & Hybrid (accessed June 27(12022)ollectivecannabis.com/cannabistrainsindicasativa

hybrid/#:~:text=Cannabis%20Indica%20was%20used%20to,high%20THC%20(tetrahydrocannabinol)%20content ¹² Id.

¹³ Id.

¹⁴ Merriam-Webster: Defined Term Cannabinoid (December 13, 20<u>21tps://www.merriam-webster.com/dictionary/cannabinoid</u>

¹⁵ Alina Bradford, Live Science: What is THC? (May 18, 2011): <u>4/www.livescience.com/24553/hat-is-thc.html</u> ¹⁶ Kimberly Holland, Healthline: Sativa vs Indica: What to Expect Across Cannabis Types and Strains (March 22, 2021) – <u>https://www.healthline.com/health/sativavs-indica</u>

Cannabis also contains terpenes, which are aromatic chemical compounds produced and commonly found in plants. Each cannabis plant has a different terpene profile, and the profile of each plant can cause varied effectstbe consumer¹⁷.

Usable cannabis and hemp are derived from the same species of plant. However, hemp is defined as cannabis that has a THC concentration of no greater than .3% total, as measured in dry weight.¹⁸ Hemp is cultivated for use in the production of a various assortment of products, including foods and beverages, personal care **pcts**, nutritional supplements, fabrics and textiles, paper, construction materials, and other manufactured and industrial gbods.

Cannabis is produced in several different forms: seeds, clones, plant tissue, plants, harvested materials (i.e., leaves, flowers, stalks, stems, pollen, and concentrates), and consumer products (consumable flowers, concentrates), hash, kekieff, waxes, oils, and vapor), topical goods, and infused consumables). The main categories of consumer cannabis products inlokudes; f concentrates; andrifusedgoods²⁰

- <u>Cannabis Flow</u>er THC in cannabis plants is produced by resinous glands that tend to concentrate in the plant's flowers or budsCannabis farmers harvest the flower from the plant (removing bulky leaves and stems with less THC concentration) and dry the plant material of any moisture so it is prepared for consumption. Generally, canfladvier is often smoked in pipes or handled cigarettes called joints, prepled joints, or prerolls. Cannabis flowercan also be smoked in a cigar or combined with tobacco and smoked as a cigarette²²
- <u>Cannabis Concentrates</u>Cannabis can be harvest and processed through methods that produce cannabis concentrates. These products have been grown, harvested, and

chemical extractions, distillation, and pressurized heat applies. These methods employ different scientific strategies to extract, at highly concentrated ratios, THC from the cannabis plant. The final product of these extraction processes can result in a range of forms, from a dry and granular pollen powder similar to haskied to a sticky resinous wax material, which can resemble plant sap, and is known as cannabised, abu(ders, shatters, crumbles, sugars, distillates, or oils). These forms vary in properties as viscosity and density cannabis²⁶ In 2021, 25years after California first authorized medical cannabis, the majority of states in the U.S. now allow the use of cannabis for medical purposes.

Colorado was the first state in the U.S. to legalize cannabis for recreational purposes if 2012. Washington also passed marijuana reform legislation shortly after Coloima 20012, legalizing the recreational use of cannabis As of November 9, 2022, 21 states, two territories, and D.C. have enacted legislation to regulate cannabis for nonmedical or recreational Asseording to 2020 U.S. Census Bureau apportionment numbers, more than 145 million Americans now live in a state that has legalized cannabis.

The path toward legalizations not necessarily straightor is it quick. The following are examples of this experience.

Today, cannabis laws in Alaska allow a**dst**. The state first legalized medical marijuana in 1998, though for many years there was no way for patients to **let** purchase it²¹ Alaska was he second state in the U.S. to decriminalize possession of up to one ounce and the third to legalize recreational marijuana² Residents over 21 years old with a valid state ID can legally grow up to six plants at home and purchase up to one ounce of marijuana or 7 grams of concentrates from regulated dispensarie³³.Only cash is accepte³.

regulation/#:~:text=In%202012%2C%20Colorado%20and%20Washington,half%20of%20the%20U.S.%20population

²⁶ National Conference of State Legislators: State Cannabis Laws (September 12, 2022) – <u>https://www.ncsl.org/research/health/statemedicałmarijuanalaws.asp</u>x

²⁷ Claire Hansen, Horus Alas, and Elliott Davis Jr., US News: Where is Marijuana Legal? A Guide to Marijuana Legalization (October 14, 2021) <u>https://www.usnews.com/news/bestates/articles/whereis-marijuana-legab-guideto-marijuana-legab-guideto-marijuana-legalization</u>

²⁸ The Marijuana Policy ProjecColorado and Washington: Life After Legalization and Regulation (2023) – <u>https://www.mpp.org/issues/legalization/coloradand-washingtonlife-after-legalizationand-</u>

²⁹ National Organization for the Reform of Marijuana Laws (NORML): Legalization and State Laws Website (November 28, 202 – <u>Legalization NORML</u> The Marijuana Policy @ject: State Policy Website (November 28, 202 https://www.mpp.org/states/

³⁰ United States Census Bureau: 2020 Census Apportionment Results (September 12, 2022)

https://www.census.gov/data/tables/2020/dec/2028pportionmentdata.html ³¹ Alaska Medical Marijuana Act, Measure 8 (1998) (Accessed Augu20209 –

https://ballotpedia.org/Alaska_Medical_Marijuana_Act,_Measure_8_(1998)#:~:text=The%20Alaska%20Medical%20Marijuana %20Initiative,marijuana%20for%20certain%20medical%20purposes.%22

³² Alaska Marijuana Legalization, Ballot Measure 2 (2014) (Accessed August 19, 2022) -

https://ballotpedia.org/Alaska Marijuana Legalization, Ballot Measure 21422 and Michael HartmanNational Conference of State Legislatures, Cannabis Overview, Alaska Legali (Matayr81, 2022) – https://www.ncsl.org/research/ciaihdcriminal-justice/marijuana-overview.aspx

 ³³Weedmaps: Alaska, Laws and Regulations (September 12, 2022): <u>#/weedmaps.com/learn/lawsand-regulations/alaska</u>
³⁴Laurel Andrews, Alaska Official Visitor's Guide, a Tourist's Guide to Legal Marijuana i(Mags2ca2018) – https://www.adn.com/alaska-visitorsguide/2018/05/02/atourists-guideto-legal-marijuana-inalaska/

Some states did not see cannabis legalized overnight. For example, Oregon's Measure 80 (Oregon Cannabis Tax Act Initiative) in 2012 did not receive enough "yes" ∛otes.

U.S. adults in 2021 believe cannabis should be legal for either medical or recreational pdiposes. Here, 60% support the galization of cannabis for medical and recreational use, and 31% support the legalization of cannabis for medical use offlyPublic opinion on cannabis and cannabis legaliza 0 Tw 12 0PTJ EMC /P <</MCID 4 (nd)10 (c)8P1vannahioabg(a)10 (n) l2 (n)igi2 (r)10

cannabis reform legislation were introduced Each bill took a different approach to altering the

On July 21, 2022, Senate Majority Leader Chuck Schumer introduced the ACt To The CAOA Act attempts to accomplish significant reformation of federal cannabis politowing states to lead on cannabis regulation and establishing a federal regulatory paradigm similar to that of alcohol and tobacco? The CAOA would expunge federal cannabis cultivation.

On October 6, 2022, President Biden asked the Secretary of Health and Human Services and the Attorney General to review how marijuana is categorized under federa^{§9} **a**wesident Biden w

- x Preventing the distribution of marijuana to minors;
- x Preventing revenue from the sale of marijuana from going to criminal enterprises, gangs, and cartels;
- x Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- x Preventing stateauthorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other **ide** activity;
- x Preventing violence and the use of firearms in the cultivation and distribution of marijuana;
- x Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana use;
- x Preventing the growin**g**f marijuana on public lands and the attendant public safety and environmental dangers posed by marijuana production on public lands; and
- x Preventing marijuana possession or use on federal property.

Many states that voted to legalize the sale and use of cannabis designed their regulated cannabis systems to carefully consider the DOJ and federal government priorities outlined in the Cole Memorandum. Each state took an individualized approximation approximati approximation approximation appro

B. The Roleof CANNRA

States have been striving to work toward best policies and practices in the cannabis and insurance industries by working through the Cannabis Regulators Association (CANNRA) CANNRAis a national notfor-profit organization of cannabis regulators hat provides policymakers and regulatory agencies with the resources to make informed decisions when considering whether and how to legalize and regulate cannabis a support association for regulatory agencies of a cannabis advocacy grohioa.53 0 Td(r)4 (o)2 (f)4 (s)8 re f* EMC-0.001 TcA(

exceeded the legal threshold, that person is considered impaired under Tibe.state of

determining the level of impairment from a cannabis user's blood or breath. Law enforcement officers mayalso have the discretion of completing a field sobriety test with any person they suspectis driving under the influence.

communicating the dangers of driving while under the influence of cannabis, called Drug Impaired Driving:fIYou Feel Different, You Drive Different.⁸⁸

2. Cannabis Workplace Impairment

Currently, two out of three Americans live in a state that has approved the sale and use of recreational cannabi⁸⁹. Cannabis can appear in drug tests and remain in a consumer for 30 days or longer.⁹⁰ Therefore, cannabis users could lawfully consume the substance during their off-work hours but still be affected by cannabis or THC in their systems during work. Employers must assess if their staff present a risk of liability to themselves or others. Problems include issues with pre-employment drug testing, determiningemployee impairment, establishing reasona0.001F 16.8

West Virginiaprohibit employers from refusing to employ an applicant or terminate an existing employee based only on a posit

can interfere with normal lung functionin⁹⁵. Since this outbreak was the result of an additive, it does not speak to the impact of vaping itself but does speak to the need for regulation.

Governments in jurisdictions with regulated cannabis industries took alternative approaches to respond to the outbreak of EVALI cases in cannabis consumers. Washington and Oregon enacted emergency bans on cannabis vaping product additives, reverse Massachusetts temporarily stopped the sale of all vaping products. While many jurisdictions were concerned about EVALI's association with consumers who vaporized cannabis, some states were confident in the safety of products being produced within the regulated systems. For example, Pennsylvania released a position in response to the EVALI outbreak, explaining that none of the EVALI cases experienced in the state were connected to the state's medical cannabis program.

F. Licensing Takes a Focus on Social and Economic Equality

The prohibition of cannabis in America has disproportionately and adversely impacted people of color.¹⁰⁸ Studies have shown that "… on average Black people are aln**tioses**!more likely to be arrested for pot than white people.⁹⁹ This racial disparity in law enforcement is present in all areas of the country, regardless of the demographics of the jurisdiction.

State-legal cannabis industries are now estimated to be worth ovlet Sillion and provide for hundreds of thousands of fullime jobs.¹¹¹ However, minority populations that were most adversely impacted by the war on drugs and **phre**hibition of cannabis arbeing excluded from

¹⁰⁵Centers for Disease Control and Prevention: Severe Lung Disease FAQ (December 6, 2021) a61 ig D60.0.7 1((i)1 D)-15m6 6r ro ex]

industry press as one of overall sales growth marked by rising incidence of consolidation. significant amount of consolidation in the industry continues to produce frequent ownership changes and business structure modifications. There are varying aspects through which this cannabis market evolution can be viewed, and each has implication is for ance coverage availability. As noted in his article "The Year of Cannabis Industry Consolid at for other Hoban writes: "There are loosely four common phases of an industry's life-extreduction, growth, maturity, and decline. The cannabis ustry is not yet mature across the board but is largely stuck in the growth phase. The step between the later stages of the growth phase and the beginning of maturity comes down to one word busolidation. That is the mantra for 2021."

There are some indications that mor.001 T213 (e)-thatrl4as thti (th)-d Tc 0 Tw 29.09 0ish0.97nhd:o

retention groups (RRGs)eing explored¹⁹ Estimates range from a handful to in excess of 30 insurers and managing general ageats/ e T *

More broadly, a primary differentiator amongst cannabis cultivators is whether the grow is outdoor or indoor (greenhouse). The two methods have significantly different risk profiles leading to differing accessibility and affordabilitoutdoor cultivation brings not only the traditional multi-peril concerns of crop insurance for destructive weather (hail, frost, damaging

Marijuana Business Operation which carries extensive rules about possession and access to the premises, security and lock standards, signage, floor plans, shared facilities (medical and adult use), waste disposal, inventory tracking, health and to be made to be ma

Insurance for cannabis manufacturing premises is reportedly becoming more widely available, but pricing can be more expensive than for other sectors. The extensive regulation of the premises must be balanced against the enhanced risksluding potentially highvalue raw materials inventory inprocess risks of fire, theft, contamination, etcand the potential of mishandling waste in violation of state law. Against this higher basedépæemises coverage can be increased risks from processing to make cannabis derivative products such as edibles, topicals and dabs. For many of these derivative products, the raw material (including cannabis or the <.3% THC hemp) must be processed sing solvents, pressure, heat, distillation/crystallization or combinations thereof. Each adds an aspect of risk should be considered and accounted for in the underwriting process.

3. Testing

Statemandated testing schemes are substantial and detailed to ascertain if the regulated cannabis

system which can be used to provide manifests documenting the transport of cannabis products throughout thestate. In Colorado, this requirement is stated in statute as:

"To ensure that no marijuana grown or processed by a retail marijuana establishment is sold or otherwise transferred except by a retail marijuana store or as authorized by law, the state licensing authority shall develop and maintain a **seesa**le tracking system that tracks retail marijuana from either seed or immature plant stage until the marijuana or retail marijuana product is sold to a customer at a retail marijuana store[.]^{1,33}.

The seedo-sale tracking system in Colorado is based on a Radio Frequency Identification (RFID) tag, which is affixed to a plant and, with aggregation of the information on it, follows the plant through cultivation, harvest, manufacturing, and distribution. For licensed operators who are transporting legal product, this permits explicit manife**t**stat can be reconciled with the cargo between cultivator and manufacturer/processor. Both medical and retail cannabis in Colorado require a transporter's licesre, which is obtained from the state's regulatory authority, the Marijuana Enforcement Division of the Colorado Department of Revenue.

Insurance concerns of transporters include cargo coverage for an oftenv**aige**-commodity that can be subject to theft/hijacking and spoilage. As described in a Reuters article, "Low coverage limits on cargo insurance, for example, can force companies to split shipments up, said Gene Brown, an insurance agent in Carmel, California, who specializes in cannabis cotterage." Similarly, the casbased current consumer economics of the industry has substantial security needs and a high risk of theft.

Recently, delivery to consumers through purchase on an app has been authorized in Colorado and has generated significant intetes his interest was likely accelerated by the expansion of other delivery services such as Uber Eats, and similar services duting COVID19 pandemic This directo-consumer delivery has similar liability concerns as other delivery services (damage to thirdparty vehicles and parties, and the potential for theft, misdirection, or deception).

5. Retailers

When someone says geal cannabis the mental picture most people have is of a local dispensary in a state where it is legalized. Certainly, for most people a dispensary or store is how

¹³³§4412-202(1), Colo. Rev. StaPowers and duties of state licensing authorityles. § (1). Note: an almost identical provision is located in Colorado's medical marijuana code.

¹³⁴Alwyn Scott, Reuters: U.S. cannabis insurers get ready

develops(e.g., vertical integration and consolidationersuscontinuation of niche commercial entities in the cannabis supply and distribution market)

1. Insurance Services Office (ISO)

ISO is an insurance advisory organization that shares actuarial information with its customers, includinginsurance companies, actuaries, agents and brokers, and government effitites gathers large amounts f loss data from various insurance companies to develop advisory prospective loss costs. Licensing carriers may use these loss costs to develop ditithate insurance rates⁵²ISO also creates insuranpelicy forms and endorsements often viewed by many as an industry standate? ISOereated policy forms and endorsements often cludepolicy language that has een tested in the courts, providing carriers with potentially less volatility in interpretation than if an insurer create sown form.¹⁵⁴

ISOinsurance programs are available to provide insurance covetorage exclude coverage with respect to cannabisrelated businesse and exposuresthrough policy endorsements.¹⁵⁵ An insurance endorsement can be used at policy inceptionafter a policy is issued to add, delete, exclude, orotherwisealter coverage^{1,56}

Previously, neither the ISO Commercial General Liability (CGL), Commercial Property (Property) nor Commercial Auto (CA) forms expressly addressed canhabisever, ISO eveloped several endorsementsto specifically address the cannabis exposure in these and other insurance programs. The related endorsements can enhance an in'suffexibility to tailor their product by expressly addressing coverage with respect to canfrebited exposures.

If an insurance carrier prefers to avoid providing coverage with respect to carnetatiesd exposures in any of the related insurance programs, ISO makes available several exclusionary endorsements to exclude coverage. However, if there is interespiroritoriding coverage for a cannabisrelated exposure, ISO has made available several endorse from the purpose

ISO's CGL and Property programs include options for the carrier to extend certain coverage with respect to the cannabis exposure. Carriers **above** the option to extend limited coverage with respect to only the hemp exposure using a cannabis exclusion with an exception applying to

¹⁵¹ Marianne Bonner, The Balance: Insurance Services Office (ISO) (May 16, <u>2019)s the Insurance Services Office (I</u>SO)? – <u>thebalancesmb.com</u>

¹⁵² ld.

¹⁵³ Id.

¹⁵⁴ ld.

¹⁵⁵Heather Howell Wright, National Underwriter PropertydaCasualty360: ISO Revises Policy Forms to Address Cannabis (November 1, 2019) ISO revises policy forms to address cannabis | PropertyCasualty360 https://www.propertycasualty360.com/2019/11/01/insurancerviceserganizationrevisespolicy-forms-to-addresscannabis/

¹⁵⁶Mila Araujo, The Balance: What Is an Insurance Endorse(**INtary**t 4, 2022)-<u>What Is an Insurance Endorsement?</u> <u>thebalance.com</u>

hemp. Additionally, the CGL program includes options for insurance carriers to exclude liability for specifically lised products.

Within the commercial general liability prograte, o developed liability coverage endorsements with an aggregate limit for cannabis, a cannabis exclusion with map exception aggregate limit, and a cannabis liability exclusion with designate product or work exception subject to an aggregate limit⁵⁷.

Lastly, ISO developed the defense within limits endorsemagnet cific to products liability coverage that allows the carrier to limit the cosof defense related to products covered by the coverage form. Similar options are available for ISO's Businessowners, Commercial Flood, and Commercial Inland Marine programs

2. American Association of Insurance Services (AAIS)

AAIS, a notor-profit advisory organization governed by its member insurance companies, provides insurance forms, rules and loss costs to the property casualty insurance industry. AAIS provides policy forms and manuals in commercial lines, inland marine, farmienturg business lines well aspersonal lines to more than 700 surance carriers.⁵⁹ As a licensed statistical agent in 51 jurisdictions, AAIS collects data that helps members meet regulatory statistical reporting responsibilities, which also supports loss cost development and ratemaking activities.¹⁶⁰

AAIS'cannabis business owners' policy (CannaBOP) product was developed at the request of the California Department of Insurance (D**C**D) strengthen carrier participation for coverage of commercial cannabis operation The CannaBOP is a package policy that provides property and liability coverages for qualifying cannabis dispensaries, storage, distributors, processors, manufacturers and private cannabis testing facilities and laborato **f**E Rather than providing coverage to legal cannabis businesses through an endorsement, AAIS advocates for cannabis specific product development and canna**b** program **s**⁶². The CannaBOP program also

¹⁵⁷ ld.

¹⁵⁸ AAIS: An Unwavering Commitment to our Members...and to the Success of the Insurance Industry (accessed February 21, 2023) –<u>Our Role in InsuranceAAISOnline</u>–<u>https://aaisonline.com/ourrole-in-insurance</u>

¹⁵⁹ ld.

¹⁶⁰ ld.

¹⁶¹ AAIS SID 16 >>BDC 0.026r EMAI2023)-uco Tc 0 Tw 9 0 0/5j Ep1[(ht)-3O (I)T33 0 Td [(/)-7.1Tw 0.307 :iAAIS SN Tc 04 (N 1Tw ()Tj E

includes the rules, loss costand a suite of optional endorsements to be used by an insurance company¹⁶³ The program also offers technology support so that CannaBOP can be quickly distributed and AAIS dedicated personnel keeping a keen eye on the "legs & regs" to help carriers

needs and risks are still unknown. The insurance needs dfaand businesses will also need to be understood. Finally, insurance regulators will need to access the capacity for new business models, such as estite consumption lounges, to find insurance coverage and address associated educational needs.

XI. APPENDIX:

ADDITIONAL CANNABIS INFORMATIONAL RESOURCES

- <u>Americans for Safe Accesstps://www.safeaccessnow.org/</u>
- <u>Cannabis Business Timestps://www.cannabisbusinesstimes.co</u>m/
- <u>Cannabis Nowhttps://cannabisnow.com/</u>
- <u>Cannabis Regulators Associationttps://www.cann-ra.org/</u>
- Drug Policy Alliancehttp://www.drugpolicy.org/
- Global Commission on Drug Policyttp://www.globalcommissionondrugs.org/
- Insurance Journal: Attaining Compliance in the Cannabis Universe: <u>https://www.insurancejournal.com/research/research/attainimpmpliancein-the-cannabisuniverse/</u>
- · Law Enforcement Action Partnershipttps://lawenforcementactionpartnership.org/
- <u>Marijuana Policy Project (MPP);ttps://www.mpp.org/</u>
- · MJ Business Dailytttps://mjbizdaily.com/
- NAIC- Cannabis Insurance Hearings:

- <u>National Cannabis Industry Associationttps://thecannabisindustry.org/</u>
- National Conference of State Legislaturestps://www.ncsl.org/research/civiandcriminal-justice/marijuanaoverview.apx
- <u>National Highway Traffic Safety Administratiohttps://www.nhtsa.gov/drug</u> impaired-driving/understandinghow-marijuanaaffects driving#:~:text=Though%2033%20states%20have%20changed,the%20wheel%20of%20a %20vehicle
- National Organization for the Reform of Marijuana Lawstps://norml.org/
- Patients out of Timehttps://www.medicalcannabis.com/
- Smart Approaches to Marijuana: