

Hello Honorable Supervisors,

I am a lead volunteer for a US-based multi-national organization who specifically designs, disperses, collects, processes, evaluates, determines eligibility for various benefits, and accepts or denies more than 1500 applications annually, managing more than 1200 successful applicants within a 5 month period, with one paid department head, two paid admin assistants, and a team of 6 other lead volunteers. Then we do it again the following year, with great success.

I read the BoS suggestion that the county use taxpayer funds to hire lawyers to 'assist in denying' applications to meet what is stated as several 'bad-actor' scenarios. This seems an un-necessary expense. Instead, why not a protocol where applicants self-select out of consideration through a simple series of response queries, leaving only responsive applicants with up to date financial responsibilities?

The current Cannabis Director informally requested alternative plans so this response addresses that request as well.

Think of the process as a sieve removing the largest blockages first, until only responsive, financially responsible applications remain.

To Clear perceived-bad-actors who are not up to date with financial requirements:

Request an Excel sheet of all Cultivation licenses and their tax status from the county tax office. Compare minimum tax reports with the applicant pool. Send warnings via email and certified mail to all applications and permits who are behind on their financial responsibilities with minimum taxes due with a deadline of XYZ months as appropriate. After the deadline, deny permits with unpaid minimum cultivation tax as allowed within 10A.17 regulations with appropriate appeal structures in place.

Financially irresponsible applicants are now removed.

To Clear perceived-bad-actors who are Non-responsive:

At the same time financially irresponsible applicants are being removed, start work on removing non-responsive applications. Create an opt-in situation for applicants so they can self-identify their activity level and thereby remove inactive applications.

Set up a private Survey Monkey questionnaire with three questions. 1) Your license number. 2) Your name. 3) Is your Phase 1 Cannabis Cultivation Application a current application or has it been abandoned?

Do an initial email blast with that survey link to all applicants on all email addresses provided in their application, with a compelling subject heading such as "Timeline Alert! Response Needed!" asking them to click on that private link by the deadline and fulfill the easy questions to continue their application. Record all 'bounced' emails and record that 'bounce' in the applications communication file and add the application's phone number to the 'Call' excel file.

At the same time, mail a certified letter to each snail mail address containing the same survey access and deadline information. Record all 'bounced' mail in the applications' communication file and add the application's phone number to the 'Call' excel file.

Collect Survey information, compare results to Excel sheet of applications, remove all reported-abandoned applications while inserting proof of stated abandonment into their files then archive the files for one year before disposing. Compile a list of non-responsive applicants. Compile a list of responsive applicants and continue their approval process.

Non-responsive applicants get a last-gasp opportunity with one phone call to the phone number listed on their application with a warning that their application is being marked as abandoned and will be held for two additional months pending a response from the applicant. Record the call in the communications log.

Release a public news release to all local papers and online news sources stating all applications have been updated as Responsive, to alert applicants who somehow missed the email, certified letter, and phone call and show the general population movement is being made.

All non responsive applications are put to one side and held securely in numerical order for two months before being removed from the office and archived for a year. At 1.5 months, send a final letter stating their non-responsive application is being denied with the State on such-and-such a date. On that date, send application-denied status to the state.

To Assist or Clear Responsive Applications considered sub-par:

At this point, you are working with responsive applicants who have self-identified as active and interested in continuing but who have an insecure grasp of required data structures or a substandard consultant. Assign each application a Lead Cannabis Planner and a backup Cannabis Planner (for when the Lead is unavailable.) Give the applicant the ability to switch Lead Planner to eliminate personal incompatibilities. If any Lead Planner is consistently declined by applicants, the Department Head should review that Planners understanding of protocols. The goal is to build a relationship between a Planner and the Applicant so the Applicant feels supported and that they have someone specific at the department who is available for answers.

Arrange a one hour recorded zoom meeting with the responsive applicant and/or their consultant to personally walk through their application with them. Record the review so the applicant can refer to the review later while detailing their application, without consuming additional staff time. Show the applicant *specifically* where their application needs enhancements. Provide examples of what a sufficient application looks and sounds like for those specific problem sections so the applicant has a tangible and specific idea of how the data should be structured, reducing frustrations on all sides.

With caveats for waiting on Agency delays, set a one-year deadline, with room for monthly increases in that time period for applicants who remain responsive and who continue working with their Planner/s showing forward movement in the appropriate structure of their application/s information.

Conclusion

There are obviously more intermediate steps and details to meet regulatory requirements and social/community needs, but this general sieving methodology:

- does not require use of taxpayer monies for additional lawyer assistance,
- does not require satellite overview,
- changes the perception of the department from punitive back to helpful and assistive,
- removes dead-weight burdens from the Planners' responsibilities and
- clears the way for responsive applicants to continue their licensing journeys, be they within Phase 1 or continuing to Phase 3 when and if it happens.

The new Cannabis Director has already begun to make improvements on communication between the application community and I applaud her for those efforts. If we can continue the trend towards more communication and increased cooperative and assistive action, it is entirely likely that within the next year most responsive applicants will complete their Phase One application or be well-structured to address future phases.

Regards,

H. Wordhouse
Jackrabbit Ranch