

Mission: The Marijuana Regulatory Agency will establish Michigan as the nation model for a regulatory program that stimulates business growth while preserving safe consumer access to marijuana.

Vision: The MRA will:

- Provide education to applicants, licensees, and all citizens on the mission and activities of the agency.
- Engage with all internal and external stakeholders in the development of policy, ensuring transparency and accountability.
- Commit to continuous quality improvement for all core business functions, using data as the driver for evaluation and decision-making.
- Provide opportunities for inclusion and professional development.

Goal 1 – Communicate with and educate applicants and/or licensees on policies and best practices

Year One	Year Two	Year Three	
 FO: At every inspection and investigation, ensure applicants &/or licensees are provided with guidance and resources to promote compliance. This goal has been met. During inspections RO's provide licensees with contact information for Metrc related issues, 	FO: Conduct compliance trainings with licensees on rules and common issues related to inspections and investigations three a year. The sessions will be conducted in each of the two F.O. areas. Conduct virtual compliance trainings with licensees on rules and common issues related	FO: Evaluate the benefits of the compliance trainings and determine need for and the frequency of this workgroup, if warranted. Identify gaps and need for additional workgroups and/or trainings to promote MRA's mission and vision.	
rule clarifications and bulletin resources. OSS: Develop and conduct one-on-one onsite METRC training (minimum of 12 per month) for licensees to ensure adherence to promulgated rules. Provide clarification through bulletins on emerging issues/trends, as	to inspections and investigations twice a year. This goal was met. Field Operations conducted two virtual training sessions open to the public, that focused on common issues regulation officers and agents identified through inspections, investigations,	OSS: Utilize METRC (user workgroup and) data to inform and conduct tailored/licensee- specific/advanced trainings. Identify gaps and need for additional trainings to promote MRA's mission and vision.	
warranted. This goal was met. Changes had to be made to the original goal to	and licensee feedback. OSS: Continue to develop and conduct	Scientific: Continue quarterly educational sessions for SCFs. Identify gaps and need for additional trainings.	
allow for virtual meetings rather than onsite beginning in July 2020, analysts began conducting one-on-one virtual Metrc training and rule/bulletin clarification to licensees to ensure compliance.	educational sessions as indicated in year one goals. (Identify areas of common issues and publish bulletins to address those common issues). This goal was partially met.	Legal: In partnership and coordination with FO & OSS staff, conduct trainings with licensees on the topic-based rules. Evaluate additional areas/issues that require legal guidance and	
Scientific: Conduct quarterly, topic-based educational sessions for SCFs Provide clarification through bulletins on emerging issues/trends, as warranted.	Due to COVID-19 and staffing constraints, one-on-one onsite Metrc training was not completed. However, multiple common issues were identified, and education was provided to licensees via bulletin. Topics covered in	provide the necessary training.	
This goal was not met. Scheduled education sessions had to be canceled due to Covid and virtual training sessions were not developed.	 common issues bulletins include: How to compliantly create pre-rolls Best practices for shipping and receiving transfer manifests Compliance with the weights and 		
Legal: Provide monthly training to FO & OSS staff on the 10 topic-based rules. This goal was met. The legal analysts provided training and Question and Answer sessions for the division based on the new rule set and topics suggested by staff members.	 measures act Plant count limits for cultivator licenses How to submit a virtual transfer request MDARD guidance: hemp in food and dairy products Sales of marijuana and non-marijuana products Testing/retesting statuses 		
	Mixing strains		



Scientific: Continue to develop and conduct educational sessions as indicated in year one goals.

Conduct quarterly training sessions (virtual), Develop educational material for laboratories focused on quality control, oversight, and training. Develop quality control and oversight program for SCFs. Provide clarification through bulletins on emerging issues/trends, as warranted.

This goal was met.

The following education sessions were held:

- 1/5/2021: Compliance monitoring and facility oversight
- 4/6/2021: AOAC Review and Requirements
- 7/6/2021: Evolution of MRA Testing program and new requirements
- 10/5/2021: Defensible data, all lab discussion on sample preparation

Legal: In partnership and coordination with FO & OSS staff, conduct **quarterly** trainings with licensees on the topic-based rules. Evaluate additional areas/issues that require legal guidance and provide the necessary training. In partnership with FO and OSS staff, the legal section will release one FAQ educational Tips Bulletin for licensees monthly.

This goal was partially met.

The following topics were covered in the FAQ educational tips bulletin:

- 2/25: Potency
- 3/12: Labeling
- 4/08: Metrc
- 5/27: Alcohol & Food @ TME / DCE
- 7/20: Video Surveillance
- 9/3: Loss of power

There was an initial delay as the section and management attempted to identify the best format to use. In addition, in some months, there were no topics to address that had not already been addressed by the MRA. For FY 2022, the goal will be revised to quarterly or as needed.



Goal 2: Engage, consult and collaborate with stakeholders in the development of policies and standards			
Year One	Year Two	Year Three	
FO: Staff will engage in data collection to gather info (feedback, issues, etc.) from licensees, compile and analyze the data monthly to identify areas/topics/emerging trends that impact the industry. Adopt feedback/recommendations where feasible. Use recommendations to guide decision making.	FO: Staff will engage in data collection to gather info (feedback, issues, etc.) from licensees, compile and analyze the data quarterly to identify areas/topics/emerging trends that impact the industry. Adopt feedback/recommendations where feasible. Use recommendations to guide decision making.	FO: Staff will engage in data collection to gather info (feedback, issues, etc.) from licensees, compile and analyze the data quarterly to identify areas/topics/emerging trends that impact the industry. Adopt feedback/recommendations where feasible. Use recommendations to guide decision making.	
This goal was partially met. Information has been collected and used to provide recommendations however analysis and collection format need to be developed.	This goal was met. Feedback collected from field operations staff was organized quarterly and used to identify common issues that should be addressed in the compliance training for licensees.	OSS: Evaluate the benefits of the workgroup, identify gaps/needs, and make well-informed decisions that are adaptive to evolving industry trends.	
 OSS: Develop and refine weekly and monthly reports to guide informed decision making. Collaborate with METRC in creating a User workgroup (comprised of representatives from the industry) that will meet quarterly to share and resolve common functionality issues/ideas. Adopt recommendations where feasible. Obtain access to and training for NCS Analytics tool – by June 2020. This goal was met with some changes. Metrc user workgroups will meet every other month. NCS has trained staff and meets with analysts regularly to discuss trend and suspicious data outliers. Scientific: Establish Scientific Advisory Workgroup (SAW) and meet monthly (starting in April 2020) to assist MRA with complex decisions on production concerns and challenges. This goal was met and continues as scheduled. The collaborative group effort has been utilized for recommendations and decision-making issues related to testing and sampling requirements. Legal: Work with MOAHR, AGs and licensees on disciplinary actions, public investigative hearings, appeals, etc. (look at scorecard metrics for data). Complete boilerplate and other required reports annually or as required. This goal was met and work with the AGs office and MOAHR continues. Boilerplate reports were completed as needed and additional reporting needs have been identified. 	 OSS: Use the workgroup recommendations to guide informed decision making. Use NCS data to forecast, chart trends, etc. This goal was met. Four Metrc user workgroups were held. Industry members completed two surveys created from workgroup ideas to help identify and prioritize areas for improvement. Based upon this feedback, OSS prioritized and executed the cultivator license plant count consolidation project. Additionally, based upon group feedback we are prioritizing and planning future projects including: making test results more readily available for licensees that are downstream in the supply chain streamlining the extraction request process averaging plant weight during harvest OSS meets with NCS analytics two times per week. OSS uses these meetings to track trends, identify areas for improvement, and identify instances of non-compliance so corrective action can be taken. Scientific: Continue regular meetings with SAW. Establish the Physician Advisory Workgroup (PAW) by April 2021 to assist MRA with learning (determine diagnosis, treatment protocol/dosing and alternate therapies); education (patient, industry and peer-to-peer); research (existing data, projects/studies underway) and provide recommendations Continue regular meetings with SAW. Gauge interest to establish the Physician Advisory Workgroup (PAW) by March 2021 to assist MRA with learning (determine diagnosis, treatment protocol/dosing and alternate therapies); education (patient, industry and peer-to-peer); research (existing data, projects/studies underway) and provide recommendations Continue regular meetings with SAW. Gauge interest to establish the Physician Advisory Workgroup (PAW) by March 2021 to assist MRA with learning (determine diagnosis, treatment protocol/dosing and alternate therapies); education (patient, industry, and peer-to-peer); research (existing data, projects/studies underway) and provide 	Scientific: Evaluate the benefits of the workgroups, identify gaps/needs, and make well-informed decisions that are adaptive to evolving industry trends. Legal: Continue to collaborate with stakeholders as indicated in year one goals.	



Establish a Cannabis Research Workgroup by April 2021 to assist the MRA with learning (developing information and data on cannabis and cannabinoid systems); education (patient, industry, and peer-to-peer); research (existing data, projects/studies underway) and provide recommendations based on cutting edge research to inform decisions. Results of discussion and workgroup recommendations will be compiled and presented to Division and Executive Directors for informed decision making.

This goal was partially met.

SAW continues to meet. There was minimal interest in the physician workgroup, so the idea was placed on hold for now. In FY 2022, we will pursue an advancing cannabis research workgroup.

Legal: Continue to collaborate with stakeholders as indicated in year one goals. Legal staff will continue to work with MOAHR, AGs, and Licensees to actively improve and refine processes and procedures. These improvements will be compiled in to a master document and will serve as a reference document for all existing and onboarding staff. Legal staff will identify redundancies in the process and remove them where appropriate in order to improve workflow and timeliness by 25%.

This goal was partially met.

- The portion of the goal regarding improving the workflow and timeliness by 25% was not met. The specific processes that were supposed to be measured and a baseline was never established. In addition, the section had to be restructured for efficiency, so this portion of the goal became obsolete and will be revisited in FY 2022.
- The section had inadequate staff for the work volume. An additional staff member will be added in FY 2022.
- Procedures were updated and implemented.
- Section metrics were met for the first time in August 2021. (Improvement 0% > 100%)
- The section implemented its use of Accela so that everything is processed in the system, which will improve efficiency.
- Received feedback and a checklist from the AG, which was used to standardize the process and update procedures related to the AG.



Goal 3: Utilize data/reports to improve service delivery

Year One

FO: Use Accela/AMO to assign inspections by licensee to ROs (serve as single point of contact and convenience) to ensure consistency in service delivery and communicate accurate MRA positions/stance on topics/issues. Develop data reports (work with MRA-IT) necessary to compile the issues – June through September 2020.

This goal was met.

RO's are assigned to facilities to ensure single point of contact and consistency in inspections. Review of investigative report data determined the need for additional investigative assistance in first district and the need for additional assistance in delivery plan approvals.

OSS: Ensure staff are trained (SQL, PowerBI, METRC Advanced) by **June 2020** to create the necessary queries/reports to demonstrate current status, emerging trends, impact of MRA decisions on the industry, etc. Create a library/warehouse of adhoc &/or custom reports to facilitate informed decision making (by September 2020).

This goal was partially met.

Staff have been trained as identified and additional data reports were created by Metrc at the request of OSS. Those additional reports will be used to develop data analysis reporting but specific reporting has not been identified.

Scientific: Complete the LPI and business requirements to integrate the inspection process

for SCFs and transition all quality control/oversight into Accela – **by June 2020**. Work with DTMB on implementation of the project.

This goal was partially met.

The LPI was completed and business requirements were developed however the business requirements do not meet the needs of MRA IT staff and need to be redone. It was determined that legal staff needs will be addressed as the first phase and scientific will be completed at a later date.

Legal: Complete the LPI and business requirements to integrate compliance process, PIH, hearings, etc. into Accela – by **June 2020.** Work with DTMB on implementation of the project.

This goal was partially met.

The LPI was completed and business requirements were developed however the business requirements do not meet the needs of MRA IT staff and need to be redone. Staff currently is working with MRA IT to complete the business requirements and will continue to work with IT to complete the various phases of the LPI.

Year Two

FO: Review and analyze data **monthly** to identify common issues with interpretation of statutes & rules including any correlation with external factors - districts, licensee type, geographic location, MRA staff, etc. Create baseline before establishing improvement goals – **target June 2021**. Implement action plan (**starting in July 2021**) based on identified issues including frequency of reporting.

This goal was partially met.

Data was collected and common issues were identified but the analysis and potential correlation with external factors is not complete. It is not complete because inspections and investigations increased significantly in FY 2021 without additional staff being added for FO. The analysis of the data will continue in FY 2022.

OSS: Review and analyze data on a **monthly** basis to identify common issues of the licensees (need one-on-one METRC training, require clarification on rules, testing statuses, etc.) – what are the top 10% of the anomalies/outliers? Resolve **within 30 days** of identification of the issues/problems.

This goal was partially met.

Metrc reports, MRA reports, and NCS reports are analyzed on a weekly basis. However, instead of utilizing the reports to identify common issues, OSS has been utilizing the reports to protect public health and safety. These reports are run weekly as opposed to monthly; when anomalies/outliers are identified, investigations are triggered within 30 days. It was necessary for OSS to focus exclusively on public health and safety issues due to the section's limited number of staff. As a result, two additional staff members have been hired so the section can expand its focus in FY 2022.

Scientific: Work with DTMB on completion of the project, which includes automation and integration of all LSS processes in to the Accela workflow (June 2021). Ensure staff are trained for utilization of Accela for tracking, reporting, and automatic notification (September 2021).

Legal: Work with DTMB on completion of the project. Ensure staff are trained for utilization of Accela for day-to-day operations (June 2021). Evaluate compliance processes and outcomes on a **biweekly** basis to inform decisions on MRA actions.

This goal was met for both Scientific and Legal. Staff are trained and process their work in Accela. In addition, a meeting regarding compliance processes is held every week to ensure consistency in the disciplinary process and determine if processes need to be changed.

Year Three

FO: Evaluate implementation plan on a yearly basis; continue to revise and update, as warranted.

OSS: Use data/reports to share/inform/ educate and obtain feedback from workgroups, industry associations, etc. Enhance transparency and accountability in all transactions.

Scientific: Use data/reports to

share/inform/educate and obtain feedback from workgroups, industry associations, etc. Enhance transparency and accountability in all transactions.

Legal: Use data/reports to share/inform/educate and obtain feedback from workgroups, industry associations, etc. Enhance transparency and accountability in all transactions.



Goal 4: Develop and retain a knowledgeable and engaged workforce that is empowered to delivering high-quality work products.				
Year One	Year Two	Year Three		
All staff will complete two relevant professional development training (as discussed with and approved by Manager). This goal was not met. 75% of staff completed two development trainings. The trainings will be completed by all staff prior to December 1, 2020. 25% of staff will participate in a process improvement activity to improve timeliness and quality of work product. This goal was met. With the staff participation in the LPI sessions that were conducted this year. 25% of staff will participate in some type of voluntary activity to manage work stress. Establish baseline. This goal was met. More than 25% of staff participate in activities to manage stress including sports, exercise, and reading.	All staff will complete a minimum of two relevant professional development training (as discussed with and approved by Manager). This goal was partially met. Not all staff completed two training courses relevant to professional development. There were 16 out of 41 staff members who completed two professional development courses FY 2021. The remaining staff will complete their courses prior to the end of the calendar year because it is required as part of their performance plans. The deadline for completion of the courses will be revised for FY 2022. 35% of the staff will participate in a process improvement activity to improve timeliness and quality of work product. This goal was met. Legal and scientific staff completed their project and now process their work in the Accela system. FO staff changed their 7-day inspections to 30-day inspections to make them more efficient. Staff discovered that many licensees were not ready for an inspection with 7 days, so it was changed to 30 days to give licensees a chance to get set up and start operating. This also allows the MRA to provide the licensees with meaningful feedback when they are starting to operate their businesses. Measure stress management activity outcomes. Determine if there is a decrease in employee work-related stress levels (target – 5% reduction). This goal was not met. No baseline or outcomes were established to measure this goal. The operations director suspended the goal because it needs to be revisited to determine a baseline and how it will be measured if it is kept for FY 2022.	All staff will complete three relevant professional development training (as discussed with and approved by Manager). 50% of the staff will participate in a process improvement activity to improve timeliness and quality of work product. 40% of staff will participate in some type of voluntary activity to manage work stress. Measure outcomes including impact on work productivity, sick hours used, turnover, etc.		