

**Mission:** The Cannabis Regulatory Agency (CRA) will establish Michigan as the national model for a regulatory program that stimulates business growth while preserving safe consumer access to cannabis.

**Vision:** The CRA will:

- Improve Regulatory compliance through education and consultation
- Reduce barriers to professional licensure
- Enhance customer experience across all programs
- Provide efficient, effective, and timely services

**LARA Strategic Goal:** Reduce barriers to professional licensure

Field Operations Inspections Section				
Goal	Action Plan	Start Date	End Date	Complete
Utilize the CRA's relationships with legislators, stakeholders, and CANNRA to enact legislation and establish policy that will promote stability and sustained growth within Michigan's marijuana industry, continue to ensure a fair and efficient licensing and regulatory process for licensees, protect consumers, and ensure Michigan's marijuana industry is prepared in the event of federal policy reform.	Continue to monitor the consistency of inspections throughout the agency and ensure employees are adhering to the established procedures through the auditing processes.	10/1/2023	9/30/2024	<p>Ongoing</p> <p>1/1/24: Monthly Audits of MDARD joint inspections initiated and will continue for all of 2024. Additionally, managers implemented the weekly reporting procedure to closely monitor the work of staff.</p> <p>8/1/24: New report writing procedure implemented - and weekly review of reports conducted - by managers.</p> <p>9/30/24: Report review reduced to bi-weekly as inspector demonstrates competency. Procedure has been drafted.</p>

Field Operations Investigations Section				
Goal	Action Plan	Start Date	End Date	Complete
Utilize the CRA's relationships with legislators, stakeholders, and CANNRA to enact legislation and establish policy that will promote stability and sustained growth within Michigan's marijuana industry, continue to ensure a fair and efficient licensing and regulatory process for licensees, protect consumers, and ensure Michigan's marijuana industry is prepared in the event of federal policy reform	Draft a survey to send to stakeholders requesting information on what they believe their biggest challenges are now, and will be in 5 years, etc.	10/1/2023	9/30/2024	Complete 4/11/24 - Survey drafted 6/5/24 - Survey released to licensees 6/19/24 - Data received and reviewed (objective complete) 8/6/24 - Data presented for review
	Review the results of the survey to determine if there are any action items for the CRA or any information to share with legislators or CANNRA.	10/1/2023	9/30/2024	Complete 8/6/24 - Data presented for review. No action items created. Objective complete.

Scientific Section				
Goal	Action Plan	Start Date	End Date	Complete
Utilize the CRA's relationships with legislators, stakeholders, and CANNRA to enact legislation and establish policy that will promote stability and sustained growth within Michigan's marijuana industry, continue to ensure a fair and efficient licensing and regulatory process for licensees, protect consumers, and ensure Michigan's marijuana industry is prepared in the event of federal policy reform	Using roles in CANNRA to work with partner states to develop a plan for more rigorous testing and harmony among states in preparation for federal legalization. This process must include the primary goal of ensuring fair testing, protecting consumers through identifying best testing practices/methods, and ensuring that the Michigan program is robust enough to prepare for federal legalization. This will be delivered as a white paper that will be released through CANNRA and disseminated to CRA management.	10/1/2023	9/30/2024	Ongoing.  3/1/24: Initiated discussions with CANNRA  8/22/24: Working with states to decide how to move testing requirements forward with third parties. Active meetings monthly.

	<p>From Oct 2023-April 2024, the section will develop budget planning and prioritization for instrumentation procurement and laboratory set up.</p> <p>From April 2024-October 2024, scientists will research current scientific literature to identify and write reference methods for implementation in the laboratory space. This will include all methods required for analysis in keeping with the current ruleset.</p>	10/1/2023	9/30/2024	Complete.
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**LARA Strategic Goal:** Provide efficient, effective, and timely services

<b>Field Operations Inspections Section</b>				
Goal	Action Plan	Start Date	End Date	Complete
Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the CRA has the appropriate organizational structures and processes in place to protect public health and safety and ensure the most efficient processes, without imposing unnecessary requirements on applicants and licensees.	Review data, identify trends, review conclusions and determine next steps, including if education is appropriate, including CMP and RF data by license type, category, etc.	10/1/2023	9/30/2024	Complete  4/11/24 - Collect data by complaint category for presentation & review  5/16/24 - Theft data for discussion  6/13/24 - Theft graphs presented for review  7/11/24 - CMP by category data presented for review  9/12/24 - CMP by Category 2022 to current for presentation

Operations Support Section				
Goal	Action Plan	Start Date	End Date	Complete
Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the CRA has the appropriate organizational structures and processes in place to protect public health and safety and ensure the most efficient processes, without imposing unnecessary requirements on applicants and licensees.	Based on the feedback received from stakeholders and legislators, use compliance data generated from data entered into the statewide monitoring system to monitor licensees' compliance and review non-compliances for all licensees at set intervals.	10/1/2023	9/30/2024	<p>Complete</p> <p>12/6/23 – the 2024 OSS Compliance Monitoring Plan and Noncompliance Notification letters were approved and put into effect</p> <p>2/28/24 – a six-month SWOT analysis was presented for review. Process improvement ideas were documented.</p> <p>6/17/24 – a nine-month SWOT analysis was presented for review. Process improvement ideas documented.</p> <p>10/3/24 – a review with the OSS team of the FY24 compliance monitoring plan numbers to determine overall effectiveness by report was conducted. A copy of the program total – broken down by investigation referrals by report type, noncompliance notifications by report type, and total payments received due to the plan – were sent to the enforcement director on 10/3/24. This objective was met and will carry into 2025.</p>

Scientific Section				
Goal	Action Plan	Start Date	End Date	Complete
Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the CRA has the appropriate organizational structures and processes in place to protect public health and safety and ensure the most efficient processes, without imposing unnecessary requirements on applicants and licensees.	Based on the feedback received from stakeholders, partner-states, and legislators, testing data reports generated from data entered into the statewide monitoring system to monitor laboratory compliance with the administrative rules. This applies to use of banned chemical residues as well as testing methods.	10/1/2023	9/30/2024	Complete  7/1/24: Adding MCT in October 2024 but will monitor positive detections as they become available.  8/22/24: Review of testing methods / violations to determine if there are items to track in I-2.
	A report will be issued to directors at the end of each calendar year that uses data obtained from Metrc to assess licensee compliance with the administrative rules in the areas of CFR compliance, compliance with pesticide usage, and testing compliance.  Areas of deficiency/non-compliance will be identified on a quarterly basis. By using the available data to identify areas of non-compliance, we will work with the rest of the enforcement division to create educational opportunities for licensees as well as opportunities for stakeholder engagement.	10/1/2023	9/30/2024	Ongoing  Q1: Non-compliance (D-8 in products, non-approved inactive ingredients, pesticide use improving, testing concerns regarding 'pay to play' continues).  Q2: No change.  Q3: Focused on MCT/inactive ingredients - working on work products for education and enforcement.  8/22/24: Inactive ingredients work product complete. Next is D-8 / Conversion literature review and white paper for EOY.

	<p>Scientific section analysts will use data gleaned from Metrc along with I2 Analyst notebook, in partnership with the enforcement and licensing division to identify licenses that demonstrate a pattern of non-compliance related to chemical residue failures and metrc inconsistencies that suggest high potential for unregulated activity. The section will create a series of flags, based on past reports, that indicate this type of behavior and will notify the FO investigation section of this behavior to escalate investigation.</p>	<p>10/1/2023</p>	<p>9/30/2024</p>	<p>Ongoing</p> <p>1/1/24: Collecting data to build repository.</p> <p>7/1/24: Waiting to see if IT can pull reports on licensing items, drafting SOPs.</p> <p>8/22/24: Bi-weekly meetings, on track, procedure complete for input of data on routine basis, evaluation of data has begun to address red flags. Routine monitoring to commence.</p> <p>11/1/24: SOPs approved, data warehouse increasing daily. This will carry over to 2025.</p>
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**LARA Strategic Goal:** Improve Regulatory compliance through education and consultation

<b>Field Operations Inspections Section</b>				
<b>Goal</b>	<b>Action Plan</b>	<b>Start Date</b>	<b>End Date</b>	<b>Complete</b>
Work with other SOM agencies to eliminate or reduce the illegal marijuana market, educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.	Continue to work with our investigative section and MSP in referring cases/evidence related to illicit products located at our licensed facilities.	10/1/2023	9/30/2024	Not Complete  This objective was not met as the Inspections Team does not interact with MSP as much as previously. Managers continue to meet monthly with our MSP counterparts, but all evidence related to unlawful activity is referred to investigations.
	Implement new Adherence to MDARD Edible Producer Inspections procedure	10/1/2023	9/30/2024	Complete  1/1/24: Procedure implemented, and audits occur monthly. This objective was met.

<b>Field Operations Investigations Section</b>				
<b>Goal</b>	<b>Action Plan</b>	<b>Start Date</b>	<b>End Date</b>	<b>Complete</b>
Work with other SOM agencies to eliminate or reduce the illegal marijuana market, educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.	Draft a survey / questionnaire(s) for MDARD (pesticide, worker standards, edible production), and EGLE to identify the most common non-compliances during their inspections / investigations	10/1/2023	9/30/2024	Not Complete  8/6/2024 - draft will be ready for review by 8/15/24. Working on how to make these closed-ended questions for data to be easier to analyze.  9/12/24 - Have not gotten to this project currently. Will attempt to get together before the end of the year - may need to push to the next fiscal year. We were unable to pose questions that would be close ended enough to garner information that would be easy to analyze.

	Prepare educational materials and/or hold an educational session with our SOM partners to advise them of indicators of unregulated products, and priority items for the agency.	10/1/2023	9/30/2024	Not Complete  As the survey was never completed, this objective was not completed, nor was it warranted.
	Identify referral points for complaints between the CRA and SOM agencies and update policies and procedures accordingly.	10/1/2023	9/30/2024	Ongoing  5/16/24 - MDARD Pesticide Referrals discussion.  8/6/24 - MIOSHA referrals discussion. No additional action items identified or required.
	Analyze data, identify trends, and determine if education would be of assistance to the industry	10/1/2023	9/30/2024	Not Complete  As the survey was never completed, this objective was not completed, nor was it warranted.

Scientific Section				
Goal	Action Plan	Start Date	End Date	Complete
Work with other SOM agencies to eliminate or reduce the illegal marijuana market, educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.	Work with MDARD's Food and Dairy division to continue improving and expanding our relationship. We want to ensure increased compliance with CFR 117 by reviewing our current procedures and approval methods for beverage processors.	10/1/2023	9/30/2024	Complete  11/1/24: Food and Beverage Specialist posted

	<p>Continue to monitor non-compliances by conferring with CRA legal and MDARD staff to determine other areas requiring education and improvement both internally and externally. New items will be added when we have identified either 90% licensee compliance in a previously identified area of concern OR as other items of priority are elevated. Each new analysis will report on current trends in the market and use a combination of education and enforcement to narrow-down on potential areas of inversion and will ensure that licensees are compliant with the rules and regulations.</p>	<p>10/1/2023</p>	<p>9/30/2024</p>	<p>Ongoing</p> <p>Q1 - Concerns: Synthetics/cannabinoids and hemp/THCA/beverage production.</p> <p>7/1/24: Focus on education re: inactive and unapproved additives.</p> <p>8/22/24: Potential to focus on additional education / changes re: pesticides and legal use requirements.</p>
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