

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:

- 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.

Field Operations Investigations: 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.

Goal	Action Plan	Start Date	End Date	Complete
CMP Data	Review CMP data related to break-ins and determine if there is anything information that is appropriate to share with the Cannabis Industry Security Association.	10/1/2022	12/1/2022	Complete
CISA Feedback	Seek feedback from the Cannabis Industry Security Association regarding verification of CRA Staff identity with email, telephone, and onsite contacts. Review feedback and develop internal policy & procedure.	1/1/2023	12/22/2022	Complete

Scientific Goal:

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.

Goal	Action Plan	Start Date	End Date	Complete
Establish Reference Laboratory	Utilize the CRA’s relationships with legislators, workgroups, and CANNRA to enact legislation and establish a CRA Reference Laboratory to promote stability and sustained growth within Michigan’s cannabis industry, protect consumers, and ensure Michigan’s marijuana industry is prepared in the event of federal policy reform.	10/1/2022	10/1/2023	Complete
Plan/Staff/Structure Reference Laboratory	Deliver a plan of proposed staff organization and structure for the reference lab to the directors for review. This will include an organization chart and will outline a series of process that will need to be developed and implemented as well as an analysis of all procedures in the enforcement division that have the potential to referred to the laboratory for support. This report will incorporate testing and processes which have been identified by CANNRA or other reputable stakeholders as being the most important for federal policy reform.	9/1/2022	10/1/2023	Complete

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Goal	Action Plan	Start Date	End Date	Complete
ISO 17025:2017 Plan	Deliver an update to the Dec 2022 report which will include a detailed timeline on how the laboratory will meet the requirements of ISO 17025:2017.	8/28/2023	7/28/2023	Complete
FDA Summary Report	Provide a summary report of FDA laboratory requirements, compared with requirements provided by other SOM agencies, ISO 17025 requirements, and other state lab requirements. Emphasis placed on areas of deficiency in the proposed laboratory space and proposals for how to approach each area of deficiency.	10/1/2022	9/29/2023	Complete

Field Ops Investigations/Inspections Goal: Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the MRA 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.

Goal	Action Plan	Start Date	End Date	Complete
	Review data to determine if current staffing can meet needs, identify any non-compliance trends in specific districts, and identify solutions.	10/1/2022	9/1/2023	Complete
	Draft a survey/questionnaire for the industry regarding investigations, inspections, compliance checks including items like frequency, deficiencies, etc.	6/1/2023	9/1/2023	Complete
	Utilize the survey outcomes to determine if education to the industry is needed, or any plan needs to be developed to address specific issues of non-compliance.	10/1/2022	9/1/2023	Complete

Operations Support Section Goal:

Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the MRA 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.

Goal	Action Plan	Start Date	End Date	Complete
	Based on the feedback received from stakeholders and legislators, Use compliance data reports generated from data entered into the statewide monitoring system to monitor licensees' compliance and review non-compliances for all licensees at set intervals.	10/1/2022	10/13/2022	Complete
	Starting in October 2022, a compliance monitoring plan will be created outlining the intervals for the reports developed and approved by the enforcement director. Initial reports will be run to ensure parameters chosen will be effective at capturing non-compliance, templated investigation reports and non-compliance letters will be created.	10/1/2022	3/9/2023	Complete
	Starting January 2023, the approved reports will be run on the frequency approved from the plan above. After 6 months and not less than one compliance report evaluation, the report parameters will be evaluated. The evaluation will include how many violations were found and how many letters or investigations were completed.	1/1/2023	5/11/2023	Complete

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Utilize data and feedback from stakeholders and CRA staff to identify and engage in specific continuous quality improvement initiatives that ensure the MRA 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.

Goal	Action Plan	Start Date	End Date	Complete
	After 6 months and not less than one compliance report evaluation, the report parameters will be evaluated. The evaluation will include how many violations were found and how many letters or investigations were completed. The evaluation will be provided to the Operations and Division directors in a report including all data generated and the parameters used.	3/1/2023	6/1/2023	Complete
	The new or updated parameters will be evaluated along with the number of violations, noncompliance letters and investigations to determine the overall effectiveness of the compliance reports for the year. An evaluation report will be provided to the executive, division, and operations directors for review.	6/1/2023	9/30/2023	Complete

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Goal	Action Plan	Start Date	End Date	Complete
	Monitor data and trends in Metrc to track changes and trends to determine if reallocation of resources of the scientific team / staff to ensure that the appropriate number of staff are monitoring trends that are high-impact and agency priority, particularly as it relates to issues of public health and safety and reduction or elimination of black-market materials. Annual baseline reports will be issued in Oct of every year with analysis of trends analyzed in April of each year. The final report for the previous year will serve as the baseline report for the next year. These reports should be created by the section, as a whole, but will contain sections from each the analysts and the scientists.	10/1/2023	4/28/2023	Complete
	Provide a baseline report to the directors highlighting the total number of chemical residue failures over the course of each annual year to current. This should be used as a baseline to make determinations on how policy, procedure, and legislation may need to change in response to these events.	9/1/2022	12/30/2023	Complete
	A first report on program effectiveness will be issued to demonstrate if the changes/processes implemented in February 2022 were effective in educating licensees and stopping behaviors commonly associated with pesticide detection.	10/1/2023	7/28/2023	Complete

Field Operations Inspections Goal: Work with other SOM agencies to educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.

Goal	Action Plan	Start Date	End Date	Complete
Work with MSP	Continue to work with the Michigan State Police and the investigative component of the CRA (Regulation Agents) when inspectors either come in contact with or receive tips regarding illicit product or illegal activities within the districts. Information will be shared during daily stand ups with investigative staff management or monthly meetings with MSP. Monitor monthly tips regarding illicit product, and attend monthly meetings with MSP/CRA in an effort to share information. Attend daily stand up with manager of investigative staff of the CRA.	10/1/2022	9/1/2023	Complete

Field Operations Investigations Goal: Work with other SOM agencies to educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.

Goal	Action Plan	Start Date	End Date	Complete
MDARD survey/questionnaire	Draft a survey/questionnaire(s) for MDARD (pesticide, worker standards, edible production), and EGLE to identify most common non-compliances during their inspections/investigations.	8/1/2023	9/30/2023	Postponed to FY2024

Scientific Goal:

Work with other SOM agencies to educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.

Goal	Action Plan	Start Date	End Date	Complete
Work with MDARD food and dairy division to continue improving and expanding CRA/MDARD relationship.	MDARD: Work with the food and dairy division to continue improving and expanding our relationship. We want to (a) ensure increased compliance with CFR 117 - assessed through total number of cases at the end of the fiscal year vs year prior, specifically in relation to those licensees who are participating in research and development of beverages. Work with the pesticide division to continue education for licensees as it relates to chemical residue cases. We see a lot of Chemical Residue failures, and we know that this is a flag that indicates black-market activity. We need to put a stop to chemical residue failures, as a whole which will be a multi-point approach. (a) Educate licensees on proper usage, reading labels, etc. CRA Field staff will receive basic training to be able to identify concerns on site and refer folks to MDARD for follow up (b) Provide licensees a list of alternatives that they may use - MDARD is creating a database for this information now and (c) Come up with a list of best practices to avoid accidental contamination at cultivation and processing facilities.	10/1/2022	9/20/2023	Complete
	The process for research and development of marijuana infused beverages will be updated and disseminated for licensees. The deliverables in this case will include updated bulletins and an updated CRA x MDARD process for educating licensees in to compliance, reviewing submissions, and approving products for sale and consumption.	10/1/2022	10/30/2022	Complete

Scientific Goal:

Work with other SOM agencies to educate stakeholders and the public, and improve applicants and licensees' compliance with licensure and regulatory requirements.

Goal	Action Plan	Start Date	End Date	Complete
<p>Work with MDARD food and dairy division to continue improving and expanding CRA/MDARD relationship.</p>	<p>Provide directors a timeline and explanation of proposed education events or materials that will be supplied to licensees over the course of the next fiscal year. This will also include a timeline of events / deliverables that MDARD x CRA are working on as resources for licensees. Right now, that includes proposed updates to the CRA Approved and Banned Chemical Residues list.</p>	7/1/2023	7/1/2023	Complete
	<p>Provide a report to the directors highlighting the total number of licensees who are approved for the research and development process or post-approval for production of beverages. This report will include a summary of all processors who are creating marijuana infused beverages and the beverages they produce. This report will also include an analysis of the level of compliance of all processors. This report will continue to be updated and issued with the addition of new processors and until all processors are in compliance with the appropriate CFRs.</p>	10/1/2022	12/30/2022	Complete
	<p>Provide a list of best practices to licensees as it relates to pesticide usage and contact information.</p>	10/1/2022	12/30/2022	Complete

Scientific Goal:

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Goal	Action Plan	Start Date	End Date	Complete
Work with MDARD food and dairy division to continue improving and expanding CRA/MDARD relationship.	Scientific Section and MDARD will have prepared a short (1-2 day) series of presentations aimed at educating CRA FO staff on pesticide usage, things to look for in the field, and the basics of cannabis. This will help the section better focus their limited availability when they are onsite either on investigation or as part of inspection to identify areas of significant concern, and refer the licensee to the appropriate SOM agency or section for further education or assistance.	10/1/2022	9/20/2023	Complete
	The first report on program effectiveness will be issued to demonstrate if the changes/processes implemented in February 2022 were effective in educating licensees and stopping behaviors commonly associated with pesticide detection.	10/1/2022	12/30/2022	Complete