



## ADVISORY BULLETIN

June 22, 2020

Supersedes September 23, 2019

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### **Common Metrc Discrepancies and Corrective Actions**

The Cannabis Regulatory Agency has identified some common errors made by licensees in Metrc and is providing information on the errors and the corrective actions needed.

#### **Incorrect Unit Weights**

The unit weight is used to calculate patient daily and monthly sales totals and it is imperative that this information is accurate.

Example:

Grower enters 5 kilograms as the unit weight when the product should be 5 grams, a patient would be oversold by purchasing 1 unit.

Growers and processors should review the unit weights for their products prior to making sales to ensure they are accurate.

#### **Incorrect Amounts Sold**

If the amount of marijuana product sold is found to be an error, the information will need to be corrected in Metrc. At an item level the grower or processor who provided the product will need to correct the unit weight, this correction does not correct the item at the marijuana sales location. The marijuana sales location will need to manually adjust the unit weight and amount purchased by the marijuana customer. It is good practice for the marijuana sales location to audit sales in the Metrc system to look for anomalies and make corrections.

#### **Duplicate Transactions**

Multiple provisioning centers have encountered third-party integrator issues which result in duplicate transactions from patients in the Metrc. Any issue with a third-party integrator must be reported to [CRA-Compliance@michigan.gov](mailto:CRA-Compliance@michigan.gov) when the issue is identified. It is the responsibility of the licensed business to ensure transactions are reported accurately in Metrc.

#### **Incorrect Patient/Caregiver Numbers**

Multiple provisioning centers have entered partial or incorrect patient and caregiver numbers in the Metrc system. Metrc validates only current, unexpired and unrevoked patient and caregiver numbers that are identical to the numbers printed on the registry cards. Provisioning centers must enter a valid patient and/or caregiver number in its entirety and correct format, including any capital letters and hyphens. Please see the examples of Michigan patient and caregiver numbers below:

- PT-19-987654
- CG-19-987654
- P987654-987654

*This advisory bulletin does not constitute legal advice and is subject to change. Licensees are encouraged to seek legal counsel to ensure their operations comply with all applicable laws and rules.*



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• C987654-987654

Provisioning centers must also indicate if a caregiver is buying marijuana product for a patient. To do this, a provisioning center must enter the patient number the caregiver is purchasing for, as well as the caregiver's number. A provisioning center cannot enter a caregiver's own patient number into the statewide monitoring system if the caregiver is purchasing for a patient.

Provisioning centers are not permitted to sell to patients without a valid Michigan medical marijuana temporary or permanent registry card in accordance with the administrative rules.

### **Rule 11(4)(c) in the Marihuana Licensees Rule Set - R 420.111(4)(c)**

Before selling or transferring marihuana to a registered qualifying patient or to a registered primary caregiver on behalf of a registered qualifying patient, inquire of the statewide monitoring system to determine whether the patient and, if applicable, the caregiver hold a valid, current, unexpired, and unrevoked registry identification card and that the sale or transfer will not exceed the daily and monthly purchasing limit established by the agency under the Medical Marihuana Facilities Licensing Act.

### **Rule 7(6)(a) in the Marihuana Operations Rule Set - R 420.207(6)(a)**

For a marihuana sales location licensed under the Medical Marihuana Facilities Licensing Act, confirmation that the marihuana customer presented his or her valid driver's license or government issued identification bearing a photographic image of the marihuana customer along with his or her marihuana registry card, or temporary marihuana registry card, to verify that he or she is the patient or, if the registered qualifying patient is a minor, the registered primary caregiver.

### **Over Sales to Patients**

Multiple provisioning centers have sold to patients beyond the allotted monthly purchasing limit of 10 ounces per month. These sales were conducted either directly or through the qualifying patient's registered primary caregiver. Prior to sale, provisioning centers must check a patient's purchasing limit status through the Patient Status Lookup function in the Metrc.

### **Over Sales to Customers**

### **Rule 6(3) in the Marihuana Sale or Transfer Rule Set - R 420.506**

A marihuana retailer, under the Michigan Regulation and Taxation of Marihuana Act, is prohibited from making a sale or transferring marihuana to an adult 21 years of age or older in a



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single transaction that exceeds 2.5 ounces, except that not more than 15 grams of marijuana may be in the form of marijuana concentrate.

Please refer to the [Metrc Michigan State Supplemental Guide](#) for a step-by-step process for conducting a patient status lookup.

Questions can be sent to the Cannabis Regulatory Agency Operations Support Section via email at [CRA-Compliance@michigan.gov](mailto:CRA-Compliance@michigan.gov).