Facility Errors and Inaccuracies in METRC

The Marijuana Regulatory Agency is advising all medical marijuana facilities of common inaccuracies observed in the statewide monitoring system (METRC). The errors and inaccuracies detailed in this bulletin are in violation of the Medical Marijuana Facilities Licensing Act and the corresponding Administrative Rules. Further discovery of these errors or inaccuracies will result in facilities receiving violations from the Marijuana Regulatory Agency Enforcement Division.

Incorrect Unit Weights
Multiple growers or processors have incorrectly entered net weight or net volume of a marijuana product, which has negatively impacted patients’ daily or monthly purchase limits detailed in Rule 75.

Action Needed: The grower or processor must determine the net weight or net volume of the product as specified in Rule 61. This must be done when the package is created and prior to the package shipping from the grower or processor. Products may be in any combination if they do not exceed the daily purchasing limit.

For purposes of determining usable marijuana equivalency, use the following conversion chart:

<table>
<thead>
<tr>
<th>Marijuana-infused product type</th>
<th>Equivalent to 1 ounce of usable marijuana</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solid (chocolate bar, gummies, brownies)</td>
<td>16 ounces</td>
</tr>
<tr>
<td>Liquid (tinctures, topicals)</td>
<td>36 fluid ounces</td>
</tr>
</tbody>
</table>

Incorrect Amounts Sold
Multiple provisioning centers have not corrected receipts that have errors for patient purchases, which has negatively impacted patients’ daily or monthly purchase limits detailed in Rule 75. If a grower or processor corrects the unit weight for a marijuana product in the statewide monitoring system, that correction does not retroactively apply to purchases made at the provisioning center prior to the change.

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 the Medical Marijuana Facilities Licensing Act and associated Administrative Rules.
**ADVISORY BULLETIN**

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**Action Needed:** Provisioning centers must manually adjust the correct weight and amount purchased by the patient for the product in the event this error occurs.

**Duplicate Transactions**
Multiple provisioning centers have encountered third-party integrator issues which result in duplicate transactions from patients in the statewide monitoring system. These duplicate transactions have negatively impacted patients’ daily or monthly purchase limits detailed in Rule 75.

**Action Needed:** Any issue with a third-party integrator must be reported to MRA-Compliance when the issue is identified. It is the responsibility of the licensed facility to ensure transactions through third party integrators are reported accurately into the statewide monitoring system.

**Incorrect Patient/Caregiver Numbers**
Multiple provisioning centers have entered partial or incorrect patient and caregiver numbers into the statewide monitoring system. Per Rule 74(1)(a), the licensee verifies with the statewide monitoring system that the registered qualifying patient or a registered primary caregiver holds a valid, current, unexpired, and unrevoked registry identification card.

The statewide monitoring system validates only current, unexpired and unrevoked patient and caregiver numbers that are identical to the numbers printed on the registry cards.

**Action Needed:** 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
- C987654-987654

Provisioning centers must also indicate if a caregiver is buying marijuana product for a patient per Rule 75(1)(b) and (2). 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. Per Rule 74(1), a provisioning center may sell or transfer a marihuana product to a registered qualifying patient or a registered primary caregiver if, the following conditions are met:

- The licensee verifies in the statewide monitoring system that the registered qualifying patient or a registered primary caregiver holds a valid, current, unexpired, and unrevoked registry identification card.

- The licensee confirms that the registered qualifying patient or the registered primary caregiver presented his or her valid driver license or government-issued identification card that bears a photographic image of the qualifying patient or 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. Per Rule 74(1)(c) and (2)(c), the licensee determines, if completed, that any transfer or sale will not exceed the purchasing limit in R 333.275.

**Action Needed:** Prior to sale, provisioning centers must check a patient’s purchasing limit status through the Patient Status Lookup function in the statewide monitoring system. Please refer to the [METRC Michigan State Supplemental Guide](https://metrc.com) for a step-by-step process for conducting a patient status lookup.

Questions can be sent to the Marijuana Regulatory Agency Operations Support Section via email at MRA-Compliance@michigan.gov

For more information about the Marijuana Regulatory Agency, please visit [www.michigan.gov/MRA](http://www.michigan.gov/MRA)

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