



ADVISORY BULLETIN

March 20, 2020

UPDATED **Contingency Planning: Steps to Take if Patient Status Lookup is Unavailable in METRC**

In order to ensure the continued operation of licensed businesses, the MRA is putting in place contingency protocols. These protocols are meant to serve in unlikely, worst-case scenarios.

The Administrative Rules for the Medical Marijuana Facilities Licensing Act (MMFLA) require Provisioning Centers to verify the patient and caregiver status of customers prior to any sales. R333.274(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.

If Provisioning Centers are unable to verify patient or caregiver status – and have received notification of METRC issues from the MRA – they should proceed under the following guidance:

Existing patients: Provisioning Centers should verify existing patients – patients who are previous customers – in their current point-of-sale system prior to making the sale and should ensure the sale is within the daily allowance for patient sales.

New patients: Provisioning Centers should review and follow internal procedures to verify a patient card is a state issued card. Provisioning Centers should make a copy of the patient card and the state issued identification card or driver's license presented prior to the sale. This copy should be kept until the patient information can be entered into METRC. The Provisioning Center should ensure the sale is within the daily allowance for patient sales.

All patient purchases conducted during the timeframe in which the system is unavailable should be uploaded to METRC within 24 hours from when the system is restored. The patient status lookup should be reviewed for each patient and – in the event a sale was made to an inactive patient or an over-sale (an amount that equals not more than 2.5 ounces of marijuana per day and not more than 10 ounces over a 30 day period) was made – the Provisioning Center must report that sale information to the MRA at MRA-Compliance@michigan.gov.

This plan is for contingency purposes only. You can contact METRC Support via email at support@metrc.com or phone (877-566-6506) for any questions or to report any issues that arise.

A complete copy of the Administrative and Emergency Rules and additional information about the MRA can be found at www.michigan.gov/MRA. Questions can be sent to the Marijuana Regulatory Agency Operation Support Section via email at MRA-Compliance@michigan.gov.

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.