

INFORMATION BULLETIN 2016-17

June 22, 2016

To: Medical Marijuana Dispensaries
From: Oregon Medical Marijuana Program (OMMP)
Subject: Monthly Reporting of Transfers for Dispensaries

Summary

Dispensaries are required to start tracking transfers and report monthly aggregate totals to the OMMP. The first month dispensaries are required to track transfers is for the month of June 2016. The first reporting deadline for the prior month's transfers is July 10, 2016. Subsequent reporting is due by the 10th of each month for the previous month's transfers.

On or before July 10, 2016, every registered dispensary must submit the information outlined in this bulletin.

An online reporting system has been developed and may be accessed at <https://mmdapply.oregon.gov/Account/Login>. However, it has been brought to our attention that using this system may be overly time-consuming considering the volume of transfers made to and from dispensaries. In light of this, our office will also accept a spreadsheet report (.xls, .xlsx, or .csv file-types only) generated from your point-of-sale (POS) system—**but only if the POS report contains all the information outlined.**

If your POS system is not able to generate a report with *all* of the required information, you will be responsible to do one or more of the following: (a) manually enter the information in the online system, (b) transition to a POS system that is able to generate a complete report, and/or (c) create a spreadsheet that does contain all of the required information.

If you choose to submit a spreadsheet report rather than the online submission, please email it to the following address: OMMP.DispensaryReporting@dhsosha.state.or.us

Your dispensary's MMD number must be included in any correspondence with the program.

Important Points:

- The monthly report is for **medical** marijuana transfers only.
- **Do not include early retail sales.** Monthly reporting does not fulfill or replace quarterly reporting requirements for dispensaries participating in early retail sales. (For more information, see: <http://www.oregon.gov/oha/mmj/Pages/reporting.aspx>)
- Price/cost/revenue data is not required to be submitted for monthly reporting.
- Quantity or amount of usable marijuana must be clearly specified in units (grams, ounces, pounds, etc.).
- Quantity or amount of *any* products other than usable marijuana must be a count of individual products transferred, and **not** a measure of weight, volume, etc. (This includes edibles, topicals, concentrates, extracts, plants, seeds, etc.).
- Unique identifying information for who performed the transfer of marijuana or cannabinoid product into the dispensary is required to be reported. This will be either: (a) patient card ID number, (b) caregiver card ID number, (c) grower card ID number, or (d) processing site registration number (a.k.a., MMPS#)
- Unique identifying information is required to be reported for transfers out of a dispensary, and will be either the patient card ID number or the caregiver card ID number.
- Any marijuana item that is returned must be documented in the report of transfers into a dispensary.
- A record of individual transfers is not required. Monthly aggregate totals per patient, caregiver, grower, or processor of transfers made in or out of the dispensary are required. However, individual transfers may be reported instead of monthly totals, as long as each transfer listed includes all required information outlined below.
- Transfers in and transfers out of the dispensary must be submitted in two separate reports and clearly labeled.
- The dispensary MMD# must be included in the reports and correspondence with the program.

Specific Reporting Requirements:

These instructions can also be found online at:

<https://public.health.oregon.gov/DiseasesConditions/ChronicDisease/MedicalMarijuanaProgram/Pages/reporting.aspx>

Two separate reports must be submitted, one for transfers in and one for transfers out. The reports must be clearly labeled as to which report is for transfers into the dispensary and which is for transfers out. Reporting is always done for the prior month's transfers. **Remember to include your dispensary's MMD number.** The reports must include the following information.

1. Previous month's report of transfers **INTO** the dispensary includes:

- Patient, designated primary caregiver, designated grower or medical processing site's registration number that performed the transfer;
- The specific "type" of marijuana item transferred;
- Total aggregate amount of the "type" of marijuana item transferred per each patient, caregiver, grower or processing site; and
- Unit of measure (grams, count, unit, etc.)

2. Previous month's report of transfers **OUT** of the dispensary includes:

- Patient or designated primary caregiver registration number that received the transfer;
- The specific "type" of marijuana item transferred;
- Total aggregate amount of the "type" of marijuana item transferred to each patient or caregiver; and
- Unit of measure (grams, count, unit, etc.)

"Type" of marijuana item must be labeled as follows:

- Usable marijuana
- Cannabinoid product
 - Cannabinoid edibles;
 - Cannabinoid topicals;
 - Cannabinoid tinctures;
 - Cannabinoid capsules;
 - Cannabinoid suppositories;
 - Cannabinoid transdermal patches;
 - Cannabinoid product other than product listed above.
- Cannabinoid concentrates
 - Cannabinoid concentrate in solid form;
 - Cannabinoid concentrate in liquid form.
- Cannabinoid extracts
 - Cannabinoid extract in solid form;
 - Cannabinoid extract in liquid form.
- Immature marijuana plants
- Seeds

If your POS system does not list transfers as defined above, submit the types as close to the list above as you can, and then ensure that marijuana item types are reported as shown above in the future months.

Each type of marijuana item must be listed separately per patient, caregiver, grower or processing site. Please see examples below.

Reporting examples:

INCORRECT:

Card #	Product	Monthly Total
1234567	Blue Dream	37
	Gorilla Glue	
	PreRolls	
	Various Edibles	
	Shatter	

The example above groups different types of products together. Product types must be reported separately, by marijuana item type with the unit of measure clearly indicated. Here is the correct version.

CORRECT:

Card #	Product Type	Units of measure	Monthly Total
1234567	Usable marijuana	Grams	30
1234567	Edibles	Units	3
1234567	Extracts - Solid	Units	4

Note that individual strains/brand names/etc. are not required to be reported. Regardless of strain, all usable marijuana can be grouped together per unique identification card or MMPS number.

It may be easier to generate a report from your POS system. These reports are sometimes made up of individual transactions, which are acceptable, as long as they include all required information. The following example has dates listed, which are not required for the monthly reporting of inventory & transfers.

INCORRECT:

Date	Product	Units	Quantity
6/11/2016	Sour Diesel	Ounces	0.1235
6/11/2016	Blackberry Kush	Ounces	0.0353
6/11/2016	Elephant	Ounces	0.0705
6/12/2016	Immature plants	Units	2
6/13/2016	Blue Dream	Ounces	0.0353
6/13/2016	Golden Pineapple	Ounces	0.2469

The POS system that generated this report did not include the type of marijuana item or any patient identification information, which makes it non-compliant with the reporting requirements.

If, on the other hand, the POS system were able to generate the following, then the reporting dispensary would be in compliance.

CORRECT:

Date	Product	Type	Units	Quantity	Patient Card #
6/11/2016	Sour Diesel	Usable MMJ	Ounces	0.1235	1234567
6/11/2016	Blackberry Kush	Usable MMJ	Ounces	0.0353	1234567
6/11/2016	Shatter	Extracts - Solid	Units	4	2345678
6/12/2016	Immature plants	Plants	Units	2	2345678
6/13/2016	Blue Dream	Usable MMJ	Ounces	0.0353	3456789
6/13/2016	Golden Pineapple	Usable MMJ	Ounces	0.2469	4567890

Note that if “Type” reported for the product “Shatter” above were to merely say “Extracts” rather than “Extracts-Solid” then it would not technically be compliant. The statute says that for both concentrates and extracts, there must be a distinction between liquids and solids.

Again, the date is not required, and neither is the specific brand or strain of product, but it is ok to include, as long as marijuana item type, amount/quantity with units, and unique identification card or MMPS number are also included.

OMMP understands that your current POS system may not define the type of product in the manner that statute requires, and that your submission may not be compliant during this first month of reporting. However, you must move toward meeting the outlined conditions, including identifying marijuana item types as described above in the “Specific Reporting Requirements” section. Failure to comply may result in civil penalties.

If you have any questions, please email OMMP.DispensaryReporting@dhsosha.state.or.us.