OREGON LIQUOR CONTROL COMMISSION

Checklist for Medical Marijuana Tracking in CTS

What is this document?

This document is intended for a person responsible for a medical marijuana site (grow site administrator (**GSA**), primary person responsible for a dispensary (**PRD**), or primary person responsible for a processing site (**PRP**)). It provides an overview and checklist of the requirements to set up an administrator account in the Oregon Liquor Control Commission's (**OLCC**) Cannabis Tracking System (**CTS**, also called "Metrc") and begin tracking medical marijuana.

Although the tracking system is administered by **OLCC**, the Oregon Health Authority (**OHA**) remains the agency overseeing the Oregon Medical Marijuana Program (**OMMP**). In addition to using **CTS** for all medical marijuana inventory tracking activities, medical marijuana registrants and persons responsible for medical marijuana sites remain obligated to follow all other **OMMP** requirements as applicable.

This is a reference document is for guidance only and does not need to be submitted as part of any registration or application. It is advised that you keep a copy available while registering your **CTS administrator** account and facility in **CTS**.

Checklist

In order to activate a CTS administrator account and start tracking marijuana inventory in CTS, registered medical marijuana processing sites, dispensaries, and grow site administrators (GSA) must first pay a $480 CTS user fee to OMMP. After the fee is paid, the CTS provider, "Metrc", will send an email notice to the responsible person that activation of a CTS administrator account is required. Once this notice is received, the person responsible for ensuring compliance with CTS must ensure the following requirements are met:

- ☐ **Activate your CTS user account when you receive the email notification from Metrc.**

- ☐ **Immediately after activating the CTS account, log in to CTS and use the "Admin" menu to order an adequate number of unique identifier (UID) plant and package tags to track current inventory. Expedited shipping is recommended for your initial tag order.**

- ☐ **Go to https://www.metrc.com/oregon and click on "Schedule Training Now" to sign up for and complete CTS training.**

- ☐ **Set up item categories and strains in CTS for all marijuana inventory. You will use these categories when tracking plants and packages of marijuana items.**

- ☐ **Upon receiving UID tags, and within 10 calendar days of activating the CTS administrator account, enter the site's inventory and track all future marijuana transfers in CTS.**

- ☐ **Maintain an accurate inventory and report all inventory changes daily.**

- ☐ **Record any incoming or outgoing transfers with a CTS-generated transfer manifest prior to any marijuana item physically leaving or entering the grow site.**

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Activating your CTS Account

Registrants will receive an email notification at the same email address used to sign up for your grower, processor or dispensary account with OMMP. This email will include a link and instructions on gaining access to **CTS**. The link expires after 24 hours. If you do not activate your **CTS** account within 24 hours, a new link will be sent every day for 10 days until your CTS account is activated. **Activation of your CTS account must be completed within 10 days of receiving the email notification or you risk revocation of the registration.**

UID Tag Orders

In order to meet the tracking requirements, an administrator must have **UID plant and package tags** on the premises and associated with the grow site in CTS. **This means tags should be ordered immediately and expedited shipping is recommended**. To expedite shipping, contact Metrc support.

- Due to initial data entry requirements, administrators are advised to begin entering data as soon as possible after receiving tags to comply with the 10-day deadline.

- An adequate number of **UID tags** must be retained on site for future daily tracking activities. Additional tags may be ordered within **CTS** through the "Admin" menu after logging in.

- Both plant and package tags will be required for a grow site. Processing sites and dispensaries will require only package tags. Tags are assigned in **CTS** and the corresponding tag is physically attached to the associated marijuana item.

- Plant tags cost 45 cents each. Package tags cost 25 cents each. Shipping costs may apply.

It is strongly recommended that administrators complete both a basic **CTS** user training and an advanced training applicable to their registration type. Metrc holds ongoing webinars and provides additional training, which users may sign up for.

Users can find this information at the top of the page at: https://www.metrc.com/oregon.

In addition, Metrc maintains a number of videos on specific system functions on the company's YouTube channel at: https://www.youtube.com/channel/UCcasu4orIpyqgEmQWWOkW0w.

Data Entry

Prior to entering start-up inventory, CTS requires that an "item category" or "strain" be created for each item that will be in the inventory. The creation of these categories does not create inventory, but provides a list of items that may be selected when tracking specific inventory. The process to create items can be found in the following document: http://www.oregon.gov/olcc/marijuana/Documents/CTS/Producer_Inventory_Transfer_Metrc_Instructions.pdf

After creating items, and within 10 days of activating a CTS account, all marijuana items at the registered premises must be in CTS, including seeds, clones, plants in any growth stage, harvested plants, usable marijuana (flower and trim), and cannabinoid items of any kind.

Specific guidance on recording incoming transfers can be found at: http://www.oregon.gov/olcc/marijuana/Pages/cannabistrackingsystem.aspx and in the OLCC compliance bulletin CE2018-01 at: http://www.oregon.gov/olcc/marijuana/Documents/Bulletins/Compliance_1801.pdf

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Immature plants under 24 inches (including clones or seedlings) are tracked as part of a "plant batch" but do not require plant tags until they are mature or over 24 inches in height, whichever comes first. Once a plant is associated with a tag, it is tracked as an individual plant instead of part of a batch. Although CTS will allow a batch of any size to be recorded, a grow site remains limited to the number of plants that may be on site based on its registration and grower/patient counts.

- "**Plant**" tags track a plant through the "vegetative" to "flowering" stages. Once a plant is harvested and recorded in CTS as part of a harvest, the plant tag is no longer used.

- "Package" tags are used when creating discreet quantities of usable marijuana from a documented harvest or from another package. The tag number is assigned in **CTS** and the corresponding tag is physically affixed to the receptacle containing the marijuana.

- Tags must stay physically affixed to the item they represent in **CTS** at all times.

- Once the item a tag is associated with is "finished" such as by being harvested or having all marijuana weight removed, the tag is "used up." Tags cannot be reused or reassigned.

Continued Tracking

CTS is intended to provide a continuous and accurate accounting of cannabis items and their movement throughout the State of Oregon. To ensure records are as accurate as possible, **CTS users** are responsible for reconciling on-site and in-transit cannabis inventory by no later than the close of each business day. This means at the beginning of each day of operation, inventory recorded in **CTS** should be 100% accurate, with adjustments recorded as needed to account for waste, loss, previous entry errors, or other inventory variances.

Transfers

There are two types of transfers.

"External" transfers indicate untracked product coming into the system, such as during the start-up period or when receiving marijuana items from a patient, as well as tracked product leaving the system, such as any transfers to one of your patients or their caregiver.

"Licensed" transfers indicate allowable transfers between registered medical sites, between licensed recreational locations, or, where allowed by rule, transfers between recreational locations and medical grow sites.

Additional User Access to your CTS account

As an administrator in CTS you are able to set up CTS accounts for other users who perform work at the site or who enter data in CTS. As the administrator you should be the only person who has permission to add or delete other users on the account. Although other users may be added to the facility and given permission to make changes to inventory and transfer reports, ultimately, the administrator remains responsible for the accuracy of all information entered into CTS.

Each registered site is added to CTS as a "facility." For any facility to which you have administrative access, you will find an "Employees" option in the "Admin" menu. You will enter basic information for an employee and add specific permissions. Any user with permission to "Manage" a section of CTS will have the ability to edit information in that section. For this reason, it is recommended that the primary administrator not grant "Manage" access to the "Employees" section to other users, because doing so will allow that user to change user permissions of themselves and other users.