Recording Transfer Manifests

General Recording Requirements for Medical Marijuana Grow Site Transfers in METRC (CTS)



Overview

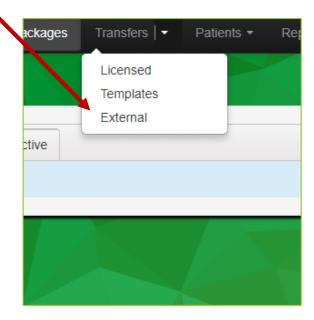
- This presentation provides information for medical marijuana grow sites that are subject to tracking in the cannabis tracking system (CTS, or "Metrc") on properly recording a transfer of marijuana to another facility in CTS.
- Medical marijuana grow sites ("grow sites") with three or more patients are subject to tracking in CTS.
- Grow sites subject to tracking in CTS may transfer limited amounts of marijuana to recreational marijuana Processor and Wholesaler licensees, but must first register with OLCC.
- Grow sites with fewer than three patients are not subject to tracking in CTS and may not transfer marijuana to recreational marijuana licensees.
- What this presentation is not:
 - ► This process does not apply to a medical marijuana grow site that is applying for its own recreational marijuana Producer license and that will be bringing its medical marijuana inventory into that license. For information on that process, see "Inventory Transfer Request Forms" on OLCC's website (link at end of this presentation.)

Different Transfer Types

When to use "External" OR "Licensed" transfers in CTS

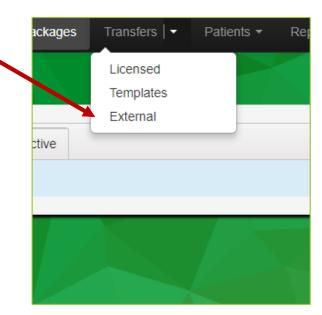
"External" vs. "Licensed" Transfers

- Grow sites often use "External" transfers.
- External transfers track marijuana items coming into the tracked system from untracked sources (from patients) or going out to untracked sources (to patients.)
- External transfers are also used by medical grow sites when receiving immature plants from any source. See medical marijuana initial setup guide for instructions on external transfers. (Link at end of this presentation.)
- "Licensed" transfers track marijuana being transferred between two facilities that are both in the cannabis tracking system (CTS.)
 - ► This includes transfers to recreational Processors and Wholesalers if the grow site is registered for the "20 pound transfer." See links at end of presentation.



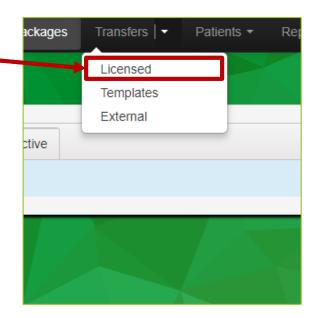
When to use a "External" Transfer

- "External" transfer should be used by a medical grower when:
 - Receiving marijuana from or sending to a patient or caregiver.
 - Receiving plants to be produced on behalf of a patient, including:
 - ▶ Plants gifted from another patient or caregiver;
 - Plants purchased from a recreational Retailer;
 - Plants obtained from a medical dispensary;
 - ▶ Plants received from a recreational marijuana Producer licensee that is approved to produce marijuana for patients.
- External transfers Plants must be assigned to a patient as part of the incoming manifest.



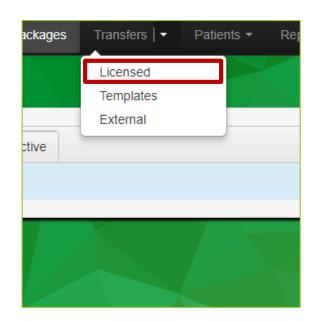
When to use a "Licensed" Transfer

- "Licensed" transfers must be used by a medical marijuana grow site when:
 - Transferring marijuana to a medical marijuana processing site or medical marijuana dispensary,
 - Transferring marijuana to a recreational marijuana Processor* or a recreational marijuana Wholesaler*, and
 - ► Transferring a test sample to an OLCC laboratory for compliance testing.
- * Requires registration with OLCC for "20 pound transfers." For more information see link at end of presentation.



When not to use a "Licensed" Transfer

- Do not record a licensed transfer when transferring to a caregiver or patient.
- Do not record a licensed transfer when purchasing plants from a retailer or dispensary.
 - Instead, those locations record a "sales transaction" and the grow site records an incoming external transfer.
- Do not record a licensed transfer when receiving plants from a recreational Producer with a "bump up" canopy.
 - The "bump up" canopy allows a Producer additional canopy space to provide usable marijuana to patients. In addition, such Producers may transfer immature plants to growers.
 - ► The Producer records an outgoing external transfer. The grow site records an incoming external transfer, if subject to CTS tracking



Summary of Transfer Types for Grow Sites

External

- ▶ To patient or caregiver
- From patient or caregiver
- ▶ When receiving plants to the grow site from any source on behalf of patient

Licensed

- ► To recreational Processor or Wholesaler (GSA must register with OLCC first)
- ► To medical processing site or medical dispensary

Prohibited

- Grow sites may not transfer to other grow sites
- ► Grow sites may not transfer to recreational Retailers
- Grow sites may not possess cannabinoid items*
 - (*If a grower is also a caregiver and manufactures homemade cannabinoid items that do not require a processing site registration, then the usable marijuana is transferred via external transfer to the caregiver, even if it is the same person as the grower. Caregiver activities take place outside CTS tracking and should not be part of grow site operations.)

20-pound Transfers

Transfers of usable marijuana from medical grow sites to recreational Processor and Wholesaler licensees

Applying for the Transfer Privilege

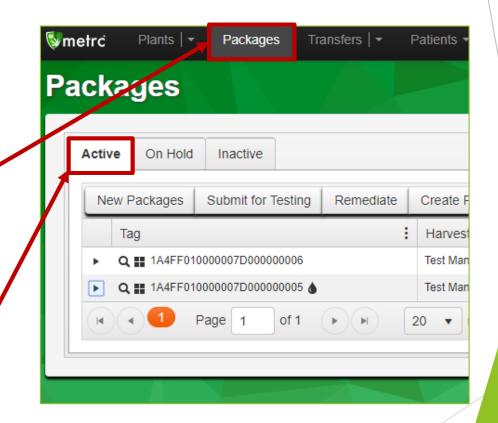
- A medical marijuana grow site may transfer usable marijuana to recreational marijuana Processor and Wholesaler licensees if:
 - ▶ The grow site was first registered on or before August 2, 2017;
 - The grow site has been continuously registered since that time;
 - ▶ The grow site administrator (GSA) submits the required application documents to OLCC;
 - The application documents include proof of legal access to water <u>for commercial</u> <u>purposes</u>;
 - ▶ The application is approved by OLCC.
- Transfers to licensees are "one-way." Recreational Processors and Wholesalers may not return marijuana to the grow site.
- Recording a transfer will display the grow site location and contact to the recipient.

Licensed Transfers

How to Record a "Licensed" facility-to-facility transfer in CTS

Check Inventory

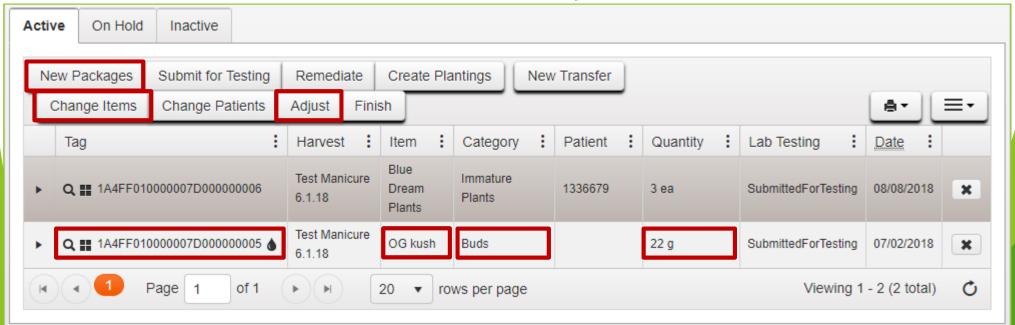
- Before recording any transfer, confirm the items you want to transfer are correctly inventoried in CTS. To check:
- Navigate to the "Packages" section by clicking in the upper menu.
- Select the "Active" packages tab if it is not selected. This will display all packages recorded in your inventory that are not at zero weight and "finished."



Check Inventory

- From the "Active" tab, find your marijuana item.
- Compare the UID to the physical package tag.
- Compare the item description/strain.

- Compare the category.
- Compare the weight.
- If you find any discrepancies, you can correct them by repackaging, changing item types, and/or recording adjustments.



Enter the Transfer Interface

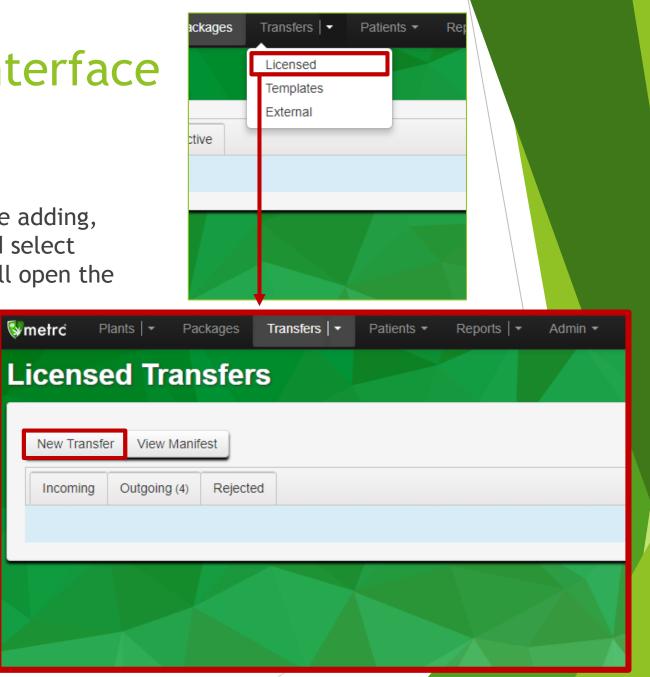
Once you know what packages you are adding, select "Transfers" from the menu and select "Licensed" in the drop-down. This will open the "Licensed Transfers" screen.

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New Transfer

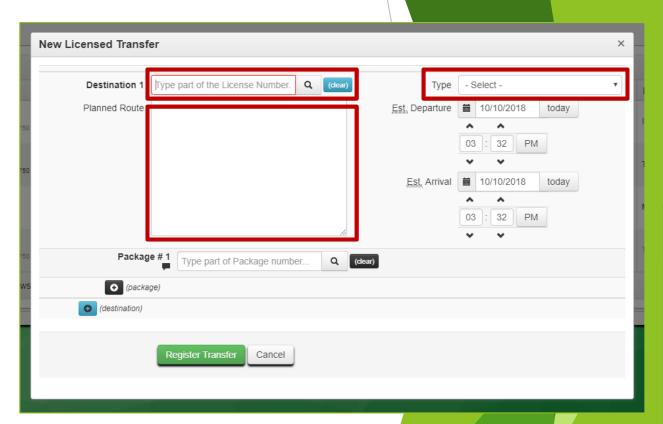
Incoming

- Three sections will display current or complete licensed transfers.
- Medical grow sites should generally have no "incoming" licensed transfers.
- To create a new manifest to another CTS facility, select "New Transfer."



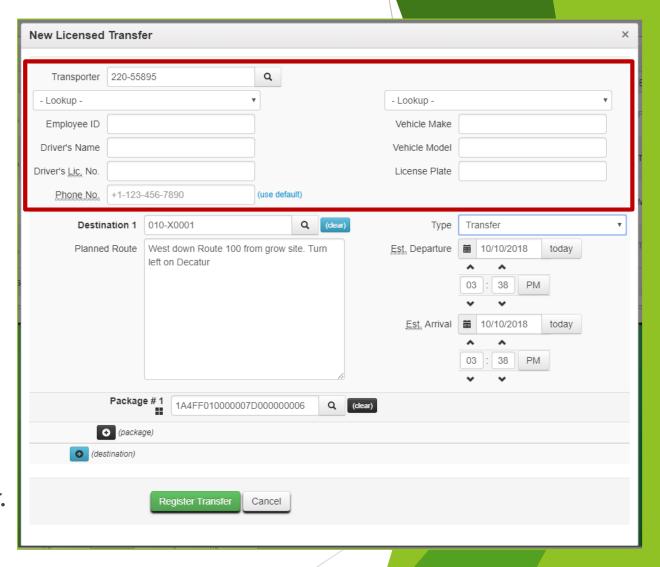
The New Transfer Window

- Clicking "New Transfer" opens the "New Licensed Transfer" window.
- You will need to know your destination. If you know the CTS license number, you can begin typing it. Include the prefix (such as 230- for medical processors, 030- for recreational processors, 250- for medical dispensaries, or 060- for recreational wholesalers.)
- Confirm the license number with the recipient prior to recording the transfer.
- If you need to search, click the magnifying glass icon. You may need to search if you have only a name or a partial license number.
- ▶ Enter a description of the transport route.
- Click "Type" and select "Licensed" from the drop-down.



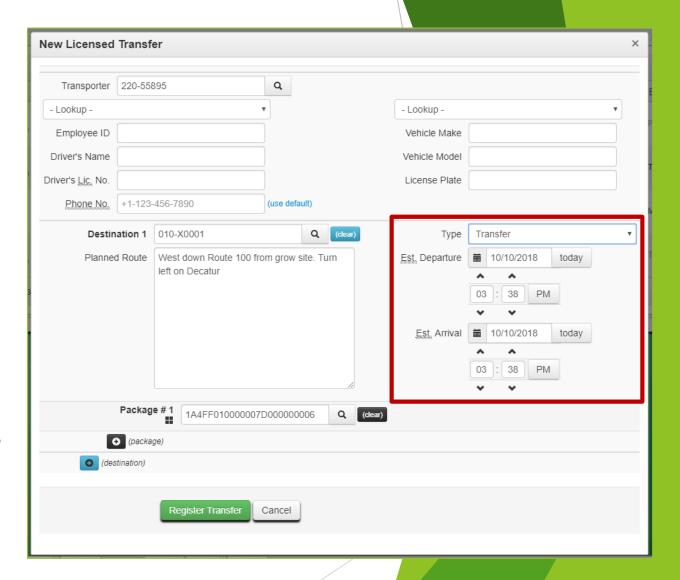
Transporter Details

- From the "Type" drop-down select "Licensed" to add transporter details. This is for listing information about the person who will be making the physical transport and delivery.
- By default the transporter will be your CTS license number. This indicates that your facility will be responsible for the transfer.
- Employee ID should be "N/A" unless the person transporting has a recreational marijuana worker permit.
- **Driver's Name** will be the person's legal first and last name.
- Driver's Lic. No. is the driver license number.
- Phone is the phone of the person transporting or the facility operator (GSA).
- ▶ Vehicle Make, Model, License Plate will be the information for the transport vehicle.



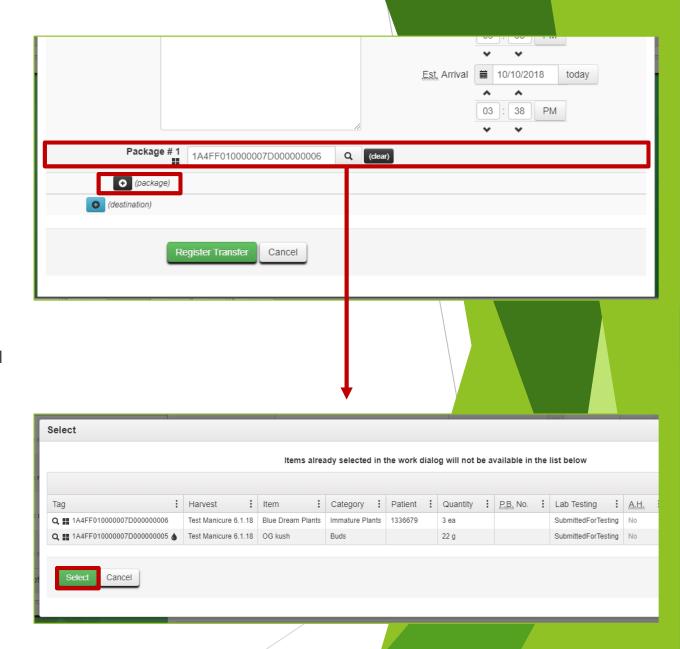
Departure and Arrival

- All manifests must have a specific date, and an estimated departure and arrival time.
- ► A Departure date must always be definite.
- Departure and arrival times are estimates only, so small variances are acceptable.
- Enter your departure time as accurately as possible.
- Arrival time should be based on expected travel. Actual arrival may reasonably vary due to traffic, unexpected delays, or driving conditions.



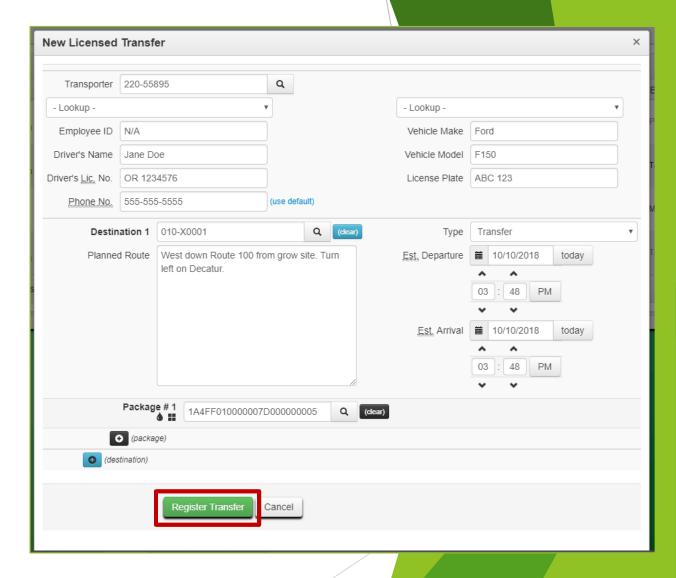
Packages to Transfer

- By default, only one line will be listed for packages and no information will be in that field.
- ► To add additional lines for more packages to the same destination, click the black "plus" icon.
- If you know the full UID or have saved it, you can enter it. Usually, to add a package to your manifest, you will click the magnifying glass icon.
- Clicking the icon opens up the selection window.
- Find the package you wish to add and click the line to highlight it.
- Click "Select" to add it to the manifest.



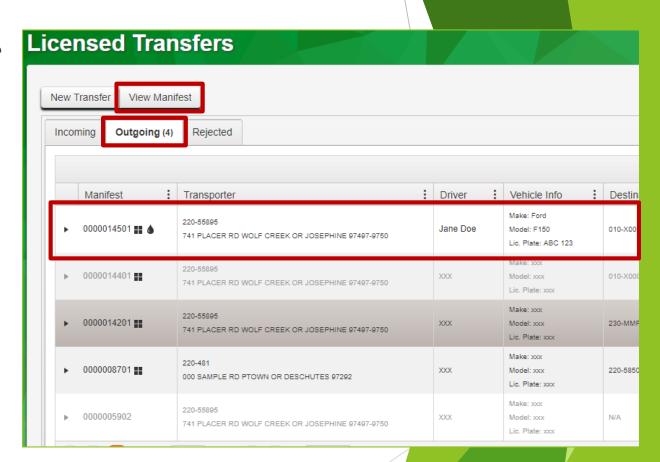
Record the Transfer

- Once you have added all information, review the transfer window to confirm everything is correct.
- When you are ready to create the manifest, click "Register Transfer."
- This will record the transfer and generate a transport manifest.
- After clicking "Register Transfer," you may need to wait several seconds for the system to update information.
- You will be returned to the "Licensed Transfers" section.



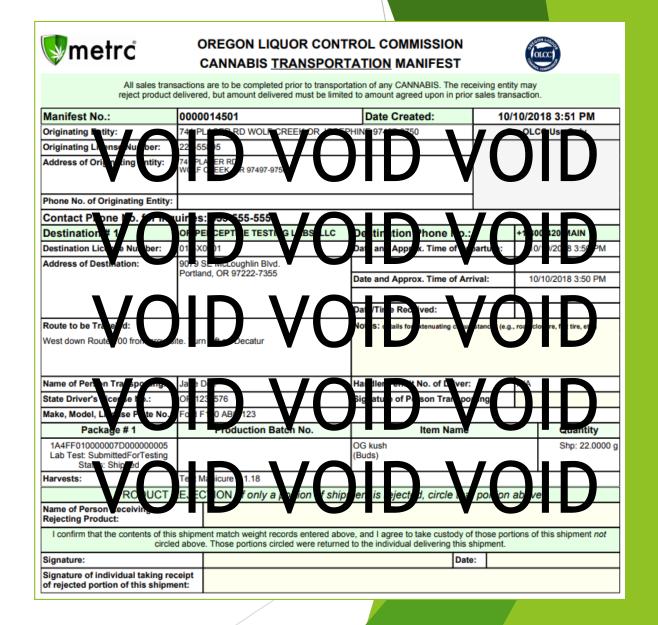
View the Manifest

- From the "Licensed Transfers" section, make sure you are on the "Outgoing" tab by clicking it.
- This section displays all of your outgoing manifests.
- The licensee you are transporting to will see a similar line in their own "Incoming" tab.
- Click the line to highlight it.
- Click the "View Manifest" button near the top of the section to view the manifest as it will appear when printed.



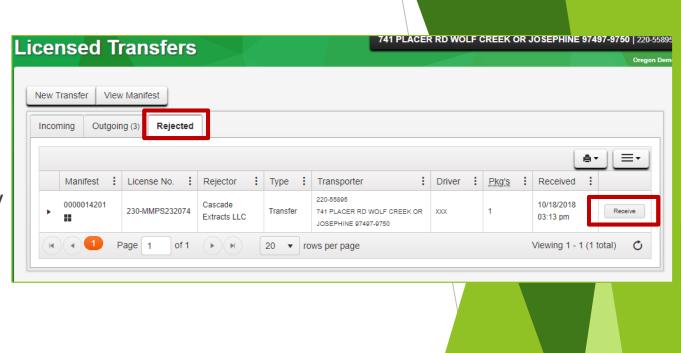
Print and Deliver

- Clicking on "View Manifest" will open the manifest as a PDF in a new window or browser tab.
- Print two copies to accompany the transport.
 - One physical copy of the manifest must be present with the marijuana items to be received at another facility and another copy must accompany the marijuana in transport.
- The recipient must verify each item tag and quantity on the manifest and in CTS.
- The recipient <u>must "Accept" or "Reject"</u> <u>each item in CTS before the transporter</u> leaves the premises.
- The recipient must then sign the physical manifest and circle any rejected items.



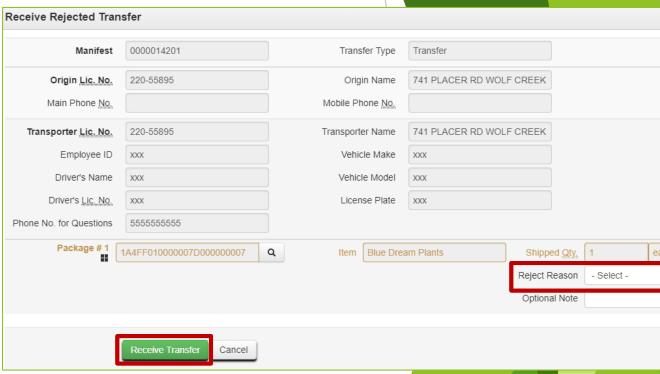
Completing Delivery

- If all marijuana items were accepted in CTS and left at the destination, then transfer is complete.
- Items "accepted" in CTS will no longer display in the origin facility's inventory. They will now be in the recipient's inventory.
- If any items were "rejected" in CTS, then they must be returned to the origin facility.
- After returning them to the original site, the origin CTS administrator must receive the items back into the site inventory.
- Navigate to the "Licensed Transfers" section in CTS and select the "Rejected" tab.
- Click "Receive" to accept the item back into inventory.



Receiving Rejected Items

- Clicking "Receive" will open the "Receive Rejected Transfer" window.
- Confirm the items that were rejected are correct, and that all tags, items, and weights are correct by reweighing items.
- Select a rejection reason from the drop down. In general this should be the same as the reason the destination licensee recorded.
- You may enter an optional note if you wish. The field will scroll to allow you to enter additional text.
- Click "Receive Transfer" to receive the items back into your inventory.
- ► To confirm, you can navigate to your "Packages" section, select the "Active" tab, and search for the associated UID.



Things to Remember

- Transfers to recreational marijuana licensees from grow sites are one-way.
 - Recreational marijuana licensees are prohibited from transferring marijuana directly to a medical marijuana grow site, even as a return.
- Visibility is also one-way.
 - A grow site that is registered will be able to see all Wholesaler and Processor licensees as valid destinations, but the Wholesaler or Processor will only see your grow site address in CTS if you record a manifest to their location.
- Wholesalers and Processors are not obligated to accept a transfer.
 - ► Ensure you have contacted the recipient licensee prior to attempting a transfer and that they are willing to receive the item.
- > You must have a personal agreement with the patient(s) that allows for the transfer.
- A grow site may transfer no more than 20 pounds of usable marijuana to recreational licensees in any 12-month period.
 - ► The limit is 20 pounds per grow site, not per grower. The marijuana does not all need to be transferred at once or to the same recipient, but no more than 20 pounds may be transferred from the grow site in this way per 12-month period.
- Recreational marijuana Retailers may not receive usable marijuana directly from a grow site.
 - However, a grow site may transfer usable marijuana to a Wholesaler who may then transfer it to a Retailer.
- All testing requirements must be met prior to transfer.

Useful Links

- OLCC information and documents for medical marijuana tracking in CTS:
 - https://www.oregon.gov/olcc/pages/ommp_tracking.aspx
- OLCC's "How to" guide for medical marijuana initial setup in CTS:
 - http://tinyurl.com/OLCC-CTS-HOW-TO
- ▶ OHA Information for the medical marijuana program:
 - https://www.oregon.gov/oha/PH/DISEASESCONDITIONS/CHRONICDISEASE/MEDICALMARIJUANAPROGRAM/Pages/index.aspx
- Metrc's CTS YouTube page:
 - https://www.youtube.com/channel/UCcasu4orlpyqqEmQWWOkW0w
- Sign up for CTS training:
 - https://www.metrc.com/oregon
- ▶ Inventory Transfer Request forms for grow sites seeking a recreational Producer license:
 - https://www.oregon.gov/olcc/marijuana/Pages/Forms_Publications.aspx
- Contact Metrc Support for questions on <u>using</u> CTS (How do I...?):
 - Phone: 1-877-566-6506
 - ► Email: support@metrc.com
- Contact OLCC for questions on CTS tracking <u>requirements</u> (Can I...?):
 - Phone: 503-872-6366
 - ► Email: marijuana.cts@oregon.gov