Recreational Marijuana Program Compliance Education Bulletin

Bulletin CE2017-06

The Oregon Liquor Control Commission is providing the following information to: existing and prospective recreational marijuana licensees and all employees working in the industry who require a worker permit.

The bulletin is part of OLCC's compliance education. <u>It is important that you read it, and understand it.</u> If you don't understand it please contact the OLCC for help.

Failure to understand and follow the information contained in this bulletin *could result* in an OLCC rules compliance violation affecting your ability to work or operate your business.

Bulletin CE2017-06 covers the following issue(s):

- Entering worker permit information into Metrc CTS
 - OLCC's definition of employee and contractor for CTS
 - Step by step details for entering Worker Permit information into CTS
 - How to regenerate API keys to synch with external POS and other systems

Licensees and employees must have Worker Permit number entered into Metrc by end of April 2017

The Metrc Cannabis Tracking System has been modified to allow employers to enter worker permit identification numbers into the system; this replaces the current process of entering a limited portion of an individual's social security number.

It is the <u>licensee's responsibility</u> to ensure all its employees have a valid worker permit **by April 28**th and that the worker permit information is entered into CTS.

If required to have a worker permit, licensees must also have a valid permit number entered into CTS. If the licensee is the primary administrator on the facility's Metrc CTS account then the licensee must ask Metrc support to enter the information on his or her behalf. The primary administrator must make the request by emailing support@metrc.com by April 28th.

A valid worker permit has 4 numbers and 2 uppercase letters in any order; for example: 1234AB or A12B34.

Who has to have a Marijuana Worker Permit?

Any individual who works at a retailer, producer, processor, or wholesaler and does any of the following tasks must have a valid worker permit to work in the marijuana industry:

- Handles, secures or sells any kind of marijuana item;
- Accesses Metrc on behalf of the licensee;
- Checks customer identification to verify age;
- Maintains records related to any of the items above; or
- Directly supervises any of the persons who do the above tasks.

Who counts as an employee? Who counts as a contractor?

OLCC rules require all employees to be entered into CTS. <u>Important: the term "employee" in rule has nothing to do with tax status or whether they receive a W-2 or 1099. If a licensee pays someone to do any task related to securing, storing, handling, selling, or recording marijuana, that individual is considered an employee.</u>

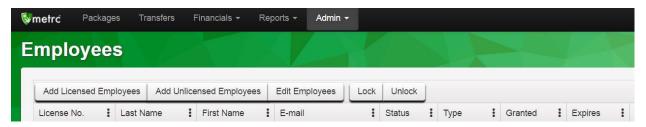
<u>Example 1:</u> A licensee subcontracts with a third-party company that provides trimmers on a seasonal, contract basis. Under OLCC rule these trimmers are employees, must have worker permits, and must be entered into Metrc for the duration of time they work at the licensee's facility.

<u>Example 2:</u> A licensee hires someone to make deliveries on their behalf and pays them on a per delivery basis. Under OLCC rule this individual is also an employee of the licensee. This driver must have a worker permit and must be entered into Metrc.

<u>Example 3:</u> A licensee hires a contractor to repair the HVAC system at the licensed premises. This contractor will have no contact with marijuana items and is not a regular employee of the business. This person does not need a workers permit and does not have to be recorded in Metrc, <u>but the licensee must record</u> the contractor's name, date of birth, and State of Oregon contractor license number (if applicable) in a daily log.

What do I record in Metrc?

In Metrc you must <u>record all licensee employees</u>, <u>even those not required to have a Marijuana Worker's permit</u> (e.g. back office staff). Now there are two ways to enter an employee into Metrc: "Licensed" (with a worker permit) or "Unlicensed" (without a worker permit).



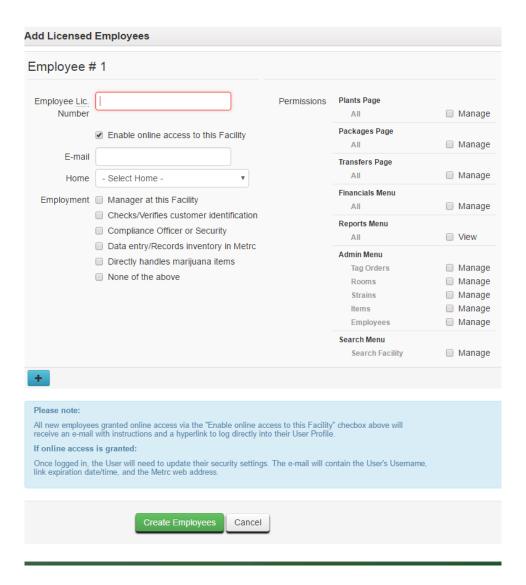
Adding a permitted employee

When adding an employee with a worker permit you must enter in the following information:

- Employee's worker permit number;
- Employee role/occupation;
- Email (if granting Metrc access);
- Metrc home screen (if granting Metrc access); and
- Metrc permissions (if granting Metrc access).

If granting the employee online Metrc access, this employee's new username will be their 6-digit worker permit number.

A valid worker permit has 4 numbers and 2 uppercase letters in any order, for example: 1234AB or A12B34.



Metrc receives data from the OLCC's Marijuana Worker Permit application system. Entering the worker permit number ("Employee Lic. Number") will "ping" the application system to verify that there is a valid permit holder with that number. Metrc will then automatically populate the Metrc employee record with the employee's name, worker permit status, and permit effective/expiration dates.

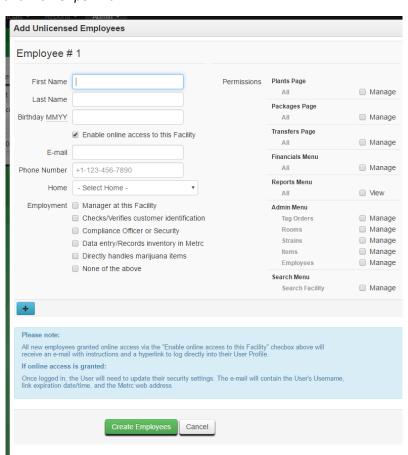
Inactive worker permits – those that are expired, suspended, or revoked – cannot be added to Metrc. If an active permittee is added to Metrc and the permit later becomes Inactive, that employee will be locked out of his or her Metrc account.

Adding a non-permitted employee

When adding a non-permitted employee you will be required to enter the following information:

- Employee's name;
- Employee's 2 digit month and year of birth (e.g. January of 1995 will look like: "0195");
- Employee role/occupation;
- Email (if granting Metrc access)*;
- Phone Number (if granting Metrc access)*;
- Metrc home screen (if granting Metrc access)*; and
- Metrc permissions (if granting Metrc access)*.

*Note: Lab and Research licensee employees are allowed to access Metrc without a Marijuana worker permit.

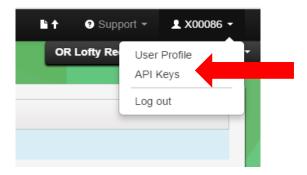


Generating API Key for new Employee Accounts

If you use an external POS or third-party system to integrate with Metrc via the API, new employee accounts will need to generate a new API key. API keys are how your third-party system is authenticated to synch with your Metrc account. Not generating a new API key may result in your POS or other system not properly transmitting data to Metrc. Below are instructions for how to create a new key within Metrc. To properly set-up or modify you third-party system you should reach out to your POS or third-party system provide for assistance.

Generating a new API key

- 1. Navigate to the User Profile, located on the far-right corner of the top navigation bar.
- 2. Click on the User name
- 3. Select "API Keys" from the dropdown list



4. Click on the green "Generate" button