

Bulletin Number: OH_IB_0042	Distribution Date: 07/01/2023	Effective Date: 07/01/2023
Contact Point: Metrc® Support	Subject: New guidance on the use of Package Adjustments and Transfers	
Reason: Effective July 1, 2023, all licensees will be required to ensure appropriate and consistent use of Package Adjustments and Transfers in accordance with this guidance.		

Greetings,

Metrc would like to share new guidance that the Ohio Department of Commerce (Department) Medical Marijuana Control Program (MMCP) is providing on the use of Package Adjustments in Metrc for licensed cultivators, processors, and testing facilities. As well as on the use of Metrc Transfers for licensed cultivators and processors.

Effective July 1, 2023, all licensees will be required to ensure appropriate and consistent use of Package Adjustments and Transfers in accordance with this guidance.

See the guidance and information in the following pages.

Package Adjustments Guidance

All of the following requirements must be met when making a Package Adjustment in Metrc.

- Licensees may only use Package Adjustments as permitted in this guidance.
- Licensees must select the appropriate “Reason” based on the information provided in this guidance.
- Licensees must maintain records that fully outline what occurred that required the Package Adjustment. Licensees must provide as much detail as possible in the “Notes” field of the Package Adjustment and may reference a log or record that is maintained outside of Metrc where further information can be found.
- Cultivation and processing records must be maintained by the licensee in accordance with O.A.C. 3796:2-2-08 and 3796:3-2-08.

The MMCP has provided the following guidance for licensees below when determining the appropriate “Reason” for the adjustment and must use the “Notes” field to explain what occurred to require the adjustment.

Cultivators	
Internal Quality Control	"Internal Quality Control" must be used when medical marijuana is destroyed during internal quality control testing conducted by a licensee. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.
Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" may be used to account for changes in moisture level that occur in bulk plant material.
Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.

Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Loss Due to Packaging Activity	"Loss Due to Packaging Activity" may be used to record a change in package weight that results from handling the product during a packaging activity, such as transferring products from one container to another.

Processors	
Internal Quality Control	"Internal Quality Control" must be used when medical marijuana is destroyed during internal quality control testing conducted by a licensee. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.
Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" must be used to account for changes in moisture level that occur in bulk plant material.
Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.

Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Loss Due to Processing Activity	"Loss Due to Processing Activity" may be used to record a change in package weight that results from handling the product during a processing activity. This package adjustment type may not be used when the processing activity changes the form of the medical marijuana.
Loss Due to Packaging Activity	"Loss Due to Packaging Activity" may be used to record a change in package weight that results from handling the product during a packaging activity, such as transferring products from one container to another.

Testing Laboratory	
Laboratory Testing	"Laboratory Testing" may be used to account for loss of product due to a testing activity conducted on behalf of a licensed medical marijuana cultivator or processor or an internal laboratory quality control.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.

Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" may be used to account for changes in moisture level that occur in bulk plant material.
Scale Variance	"Scale Variance" is used to account for minor differences in weight when re-weighing a sample during accessioning.
Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.

Transfers Guidance

The MMCP is providing further guidance referencing O.A.C. 3796:5-3-01, *a medical marijuana entity must maintain a written transportation log (i.e., manifest) prior to transporting any medical marijuana. The licensee transporting the medical marijuana must transmit a copy of the manifest to the licensee receiving the medical marijuana and enter the required information in Metrc before the close of business on the day prior to the transfer.*

All of the following requirements must be met when making a Transfer in Metrc.

- Licensed medical marijuana facilities are only permitted to transfer product from cultivator to processor, and processor to dispensary.
- Any necessary exceptions to these restrictions (ex. processor to cultivator) will require approval from the MMCP by submitting a ticket to Metrc Support.
- Transfers from cultivator to cultivator or processor to processor are prohibited.
- All transfers from cultivator to processor and processor to dispensary are entered into Metrc as “Wholesale” transfers.
- Licensees must create a separate manifest for each receiving facility.

All manifests must contain the following information:

- (1) The names and addresses of the medical marijuana entities sending and receiving the shipment.
 - a. In Metrc, licensees must enter the Facility License Number, which will populate the name and address of the receiving entity.
- (2) The names, Department-issued Employee ID Badge numbers, Driver’s License numbers, and phone numbers of the employees transporting the medical marijuana.
 - a. Driver information may be stored in Metrc via use of the template feature.
 - i. Both drivers’ information must be entered in each applicable field. For example, if John Smith and Jane Doe are the two individuals transporting the medical marijuana, the “Driver’s Name” field must list John Smith/Jane Doe, the “Employee ID” field must list MMCPE12345/MMCPE54321, etc.
- (3) The license plate number and vehicle make and model that will transport the shipment.
 - a. Vehicle information may be stored in Metrc via use of the template feature.
- (4) The time of departure and estimated time of arrival.
- (5) The specific delivery route, which includes street names and distances.
- (6) The total weight of the shipment and a description of each individual package that is part of the shipment, and the total number of individual packages.
 - a. On the Metrc Transfer screen, the licensee must enter the package number for each package in the shipment.
 - b. The necessary information, including the description and weight of each package, will automatically be pulled from the information entered into Metrc for that package and included on the manifest.

- (7) The wholesale price.
 - a. Licensees must enter an accurate wholesale price. If there is no wholesale price (for example, a cultivator sends plant material to an affiliated processor), the amount must be entered as \$.01.

Transfer Manifest Rejection Reasons Cultivators and Processors	
Damaged Product	"Damaged Product" must be used when the primary reason for the transfer rejection is because the medical marijuana is damaged.
Incorrect Quantity	"Incorrect Quantity" must be used when the primary reason for the transfer rejection is because the amount of medical marijuana received is incorrect. It may be incorrect because the quantity listed on the manifest does not match the physical quantity received or it may be incorrect because it is not the amount that was expected.
Incorrect Item	"Incorrect Item" must be used when the primary reason for the transfer rejection is because the item(s) received is incorrect. It may be incorrect because the item listed on the manifest does not match the physical item received or it may be incorrect because it is not the item that was expected.
Product Recall	"Product Recall" must be used when the medical marijuana contained in the transferred packages is subject to a product recall.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Spoilage/Expiration	"Spoilage/Expiration" must be used when the package is being rejected because the medical marijuana is spoiled or expired.
Other	"Other" may only be used when the reason for the rejection is not covered by one of the other options. The licensee must provide detailed notes to explain the reason for the rejection of the transfer.

For questions regarding amount owed, payment setup, or other account-related inquiries, you can contact Metrc Support at 877-566-6506 or support@metrc.com. Please provide your license # and Metrc username to aid in the inquiry process.