

Missouri Division of Cannabis Regulation Guidance Document – 1/31/2023

Topics: Mandatory Reporting Requirements to the Department; Seed to Sale and Physical Inventory Expectations

Mandatory Reporting Requirements to the Department

The licensee notification and reporting provision in 19 CSR 100-1.100(6) requires licensees to keep the Department apprised of certain information. For all notifications required pursuant to 19 CSR 100-1, a licensee must email ComplianceInspections@health.mo.gov and their assigned compliance officer to properly notify the Department.

Seed to Sale and Physical Inventory Expectations

Licensee inventory requirements previously within Facilities Generally are now outlined separately in 19 CSR 100-1.130(1) *Inventory Control Systems and Procedures*. While the area of rule regarding inventory control has expanded, many of the expectations remain the same. DCR clarified these expectations to ensure compliance as inventory control is, and will continue to be, a high priority.

19 CSR 100-1.130(1) outlines multiple inventory tracking requirements, such as, when marijuana plants and products should be tagged and what additives, or ingredients, must be reported into the statewide track and trace system. In addition, this section provides timeframes to verify accuracy of information entered into the statewide track and trace system, as well as, when to report and correct errors.

Furthermore, licensees are required to fill in all fields available in the statewide track and trace system, including the name of the facility agent that is completing the action. It is DCR's expectation that licensees properly use the statewide track and trace system, including monitoring the connection between it and any seed-to-sale system used to facilitate the delivery of records into the statewide track and trace system.

Another inventory control requirement is for licensed facilities to submit monthly physical inventory reports to DCR, including all adjustments and adjustment reasons. DCR already expects licensees to complete frequent inventory audits to ensure inventory within the facility is accurate at all times and the licensee is not subject to inversion, diversion, etc. DCR expects licensees to submit monthly inventory reports by the fifth of each month for the previous month. For instance, physical inventory reports for the month of February must be submitted by March 5th. Licensees must send reports the license's assigned compliance officer and ComplianceInspections@health.mo.gov.

As of February 3, 2023, the effective date of the emergency rules, licensees must be in compliance with all applicable rules outlined in 19 CSR 100-1, with the exception of the rules covered by the variances and waivers issued on January 20, 2023. Licensees should immediately begin working towards coming into compliance with any changes or clarifications outlined in rule. As outlined in the January 4th email to licensees regarding inventory, DCR expects licensees to complete standard operating procedure (SOP) updates and staff training by March 1, 2023. The Compliance team will be following up on this requirement.

Per 19 CSR 100-1.080(1)(F), the Department expects licensees to incorporate inventory control activities into their standard operating procedures, and train appropriate staff. For questions regarding rule

requirements and expectations, please reach out to the license’s assigned compliance officer. For questions regarding Metrc, please reach out to Metrc Support via phone at 1-877-566-6506, or email at support@metrc.com. Metrc also offers multiple resources including the manual/user guide, state supplemental guide, training through the BridgeApp and training videos found under the Support tab in Metrc or on YouTube.