Ohio Medical Marijuana Control Program
Product ID Submission FAQs

UPDATED 4/17/2020

NOTE: All medical marijuana products must have a Product ID assigned by the State of Ohio Board of Pharmacy. This applies to each medical marijuana strain and medical marijuana form and dose. The assignment of a Product ID serves as evidence that only authorized forms and methods of administration are available to patients and their caregivers.

Items submitted for Product ID assignment can only be created in METRC. **Items cannot be created through your point-of-sale vendor regardless of whether an API connection has been established.**

This FAQ has been organized into 3 topics:1) General questions on Product ID; 2) Questions specific to Tier I and Tier II Plant Material products; and 3) Questions specific to all other authorized forms and methods (Non-Plant Material products). For additional information please email MMCP-ProductID@pharmacy.ohio.gov.

No.	Question	Answer
General Questions		
1	What is a PMP / PDMP / OARRS?	State Prescription Monitoring Programs (PMPs) (also known as Prescription Drug Monitoring Programs (PDMPs)) serve to: Assist healthcare practitioners in making informed healthcare decisions; Help identify and prevent prescription drug abuse, misuse, or addiction; and help law enforcement investigate prescription drug abuse. Ohio's PDMP is referred to as the Ohio Automated Rx Reporting System (OARRS).
2	What is a Product ID and what is its format?	The Product ID is an 11-digit number beginning with the letter "M" (e.g. M0000009401) used for submitting data to OARRS. In some screens in METRC the Product ID and Item Name are joined.
3	Is a Product ID required for submitting product to testing labs?	No. An assigned Product ID is not required to submit samples to labs for testing.
4	How long should we expect it to take for the assignment of a Product ID?	Timing will vary on volume, complexity, and completeness of submissions.
5	What prevents a Product ID from being assigned?	A checklist, based on applicable rules, has been developed for use by the reviewers of Product ID submissions. The checklist is located on the MMCP Licensee Resources page.

No.	Question	Answer
6	Does a licensee have to register every increment of daily supply they wish to sell and is there a separate fee for each? What is the method of payment?	Yes, every increment of daily supply must be registered via METRC as a separate Item with its own Product ID and a fee is required for each dose of a product. However, additional fees are not required for different packaged quantities / increments (Item). Each product dose (Item Brand) requires a one-time $100 registration fee. Please note that payment for the assignment of a Product ID can only be made by credit card, through the State's third-party payments processor.
7	What is the difference between an "Item Brand" and an "Item"?	The Item Brand is the overall designation for each product dose. Item refers to the quantity of a product. By analogy, a 200 mg ibuprofen tablet would be an Item Brand. A bottle containing 100 or a blister pack containing 20 of the 200 mg ibuprofen tablets would be examples of Items associated with the Item Brand.
Plant Material Product Questions		
8	What is being reviewed as part of Product ID assignment for Plant Material products?	The Item Name will be reviewed for format and content. The content of the Item Name will be reviewed for consistency with the values provided in the required fields. The weight of the item and the number of days' supply will be reviewed for compliance with the 90-day supply rule. Note, no photo is required to be uploaded for Plant Material product submissions.
9	Does plant material need to be packaged in complete increments of Whole Day Units?	Yes. A "whole day" unit is 0.1 ounce—2.83 grams—for plant material. This does not, however, amount to 1/90 of a 90-day supply. When dispensed plant material falls between two whole days dispensed, any partial dispensing of a day dispensed counts as a full day dispensed. The Day Supply Reference Document provides the number of days dispensed for each increment in which medical marijuana may be dispensed. For example: 2.83 grams of Tier I plant material = 2 days dispensed.
10	Regarding the naming convention for Items/Item Brands, do we have to use the Indica/Sativa/Hybrid naming convention for our Items?	The naming convention is needed for standardized OARRS reporting. This standardized reporting requires the use of Indica, Sativa, or Hybrid in the Item Brand and Item Name for Plant Material Product ID Assignment. The minimum required elements in the Item Brand name should match the minimum required elements of the Item name. When creating an Item in METRC, the value selected in the Strain field can be of any Strain previously approved by the Ohio Department of Commerce.

No.	Question	Answer
11	When making an Item Brand the example in the Guidance Document specifies to include the exact THC and CBD levels, but since these numbers are extremely variable, do we need to create different Items/Brand every time we harvest a 15-pound batch?	A product may be between 5% below and 5% above the target concentration reported on the label. If there is a variance beyond the allowable range, then a new Item and Item Brand must be created. This THC / CBD Range document can be consulted for assistance with this calculation. If the THC content of a batch of Bulk Plant Material exceeds the Tier I limit (23%) then it can only be sold as Tier II Plant Material. In this example, registering the strain as both Tier I and Tier II Plant Material will allow Plant Material to be packaged as Tier II Plant Material and not require it to be used exclusively for processing.
12	The 95%-105% (5% below and 5% above the THC and CBD concentration reported) variance does not provide very much room for error, especially for Plant Material products with very low concentration levels?	The Board has set a minimum threshold of 0.3% for THC % Content and CBD % Content below which Plant Material products are considered to have 0% content and therefore not subject to the 95%-105% range rules. For Example: If a plant material's target THC % in the Product ID is 0.29% then the product can be considered zero if the testing results can range between 0 - 0.29%. If the product's THC % from testing is 0.3% then the +/- 5% variance must be considered and the product must be registered accordingly. If the target THC or CBD % in the Product ID and the testing results are less than .3 % then the +/- 5% variance does not apply and the THC or CBD content must be registered as zero. If the target THC or CBD % is .3% or greater then the THC or CBD % from the testing information must fall within 5% variance and the product must be registered accordingly. If a Plant Material product is registered as 0% CBD the testing data must fall anywhere from 0.0 – 0.29% CBD.
13	Does the +/- 5% reported concentration variance account for the lab testing margin of error?	No.
14	When entering the "Supply" for the Item registration, do we enter the actual grams (weight of the product) or the number of days' supply that this corresponds to?	The value for Supply for an Item should be entered according to the Day Supply Reference Document. This value cannot be less than 2 (See question 9). The weight for a Plant Material product should be entered into the Unit Weight field in grams.

No.	Question	Answer
15	How do we include the THC / CBD percentage (required for Plant Material products) prior to receiving the 3rd party lab results?	A processor or cultivator with a plant-only processor designation should not register an Item for a Product ID assignment in METRC until they have lab test results from bulk material.
16	Are Plant Material Product IDs that were submitted and approved prior to certain fields becoming required (e.g. "Unit Weight") still valid for use?	Yes. Previously approved Items will remain active as they currently exist in METRC.
Non-Plant Material Product Questions		
17	What is being reviewed as part of Product ID assignment for Non-Plant Material products?	The Item Name will be reviewed for format and content. The content of the Item Name will be reviewed for consistency with the values provided in the required fields. The weight of the item and the number of days' supply will be reviewed for compliance with the 90-day supply rule. For non-plant products, the photo showing the form of the product will also be reviewed.
18	Why is a photo required for Non-Plant Material as part of the Product ID assignment? What does it need to show?	The photo is needed to confirm that the form of product complies with relevant statutes and rules related to authorized forms (e.g. not attractive to children). The image of the product should show the product in minimal packaging unless needed for containment (e.g. oil, lotion).
19	What increments should Non-Plant Material products be packaged in?	All products must be packaged in "whole day units". For non-plant forms this amounts to 1/90 of a 90-day supply. See page 2 of the Product ID Checklist for more information.
20	Are ingredients listed by weight? Do you prefer for "extract" (as seen typed out on page 16 of guidance document) to be listed as "medical marijuana extract"?	The ingredients are not required to be entered in any specific order. The only specification is to include all ingredients used to comprise the Item. Marijuana extracts should be reported as "medical marijuana extract".
21	What are the packaging and dosing limits for oils, tinctures, capsules, and edibles for oral administration?	Oils, tinctures, capsules and edibles for oral administration are to be packaged in increments that contain 110 mg of THC. Please note, no portion or dose of these forms of medical marijuana is to exceed 50 mg of THC. For example: One package of four capsules contains 110 mg of THC and each capsule included in the package contains 27.5 mg of THC.
22	How should product be dosed for oils for vaporizing?	Oils intended for vaporization must be packaged in increments that contain 590 mg of THC. No medical marijuana extract may exceed 70% THC content.

No.	Question	Answer
23	Can more than a one-day supply of Non-Plant Material product be included in the same package?	Yes. A whole day unit is the increment in which a product may be sold. Products may be sold in any whole day increments from 1 to 90.
24	Does the Universal Symbol need to be on each capsule or is it sufficient to include the Universal Symbol on the package?	The Universal Symbol must be on each portion or dose. Please note, capsules are an authorized form of medical marijuana, but tablets are not an authorized form of medical marijuana. The Universal Symbol must be ¼ inch by ¼ inch in size.
25	What is the per dose THC limit for lotions, creams, or ointments for topical administration?	The regulations do not provide a maximum THC dose for lotions, creams, and ointments for topical administration. It is the processor's responsibility to balance product dosing with patient safety. If adverse events are reported due to the product, the product may be recalled and / or placed on an Administrative Hold, which will prevent that product from being sold to a dispensary and dispensaries will be notified that the product is not to be dispensed. Please note, each portion or dose of medical marijuana must enable a reasonable person to intuitively determine how much of the product constitutes a single portion or dose. Lotions, creams, and ointments are required to be sold in increments that contain 295 milligrams of THC.
26	The 95%- 105% (5% below and 5% above the THC and CBD concentration reported) variance does not provide very much room for error, especially for processed products with very low concentration levels?	The Board has set a minimum threshold of 0.1% for CBD % Content below which Processed Material products are considered to have 0% content and therefore not subject to the 95%-105% range rules. There is no zero threshold for THC % in Processed products at this time.
27	Does the +/- 5% apply to products that have a THC per dose maximum of 50 mg?	Target THC content for edibles, oils, tinctures for oral administration and patches for transdermal administration shall not exceed +/- 5% of the maximum 50 mg THC per dose.