



Dispensary Licensee Newsletter - January 2021

IMPORTANT UPDATES

Updated Whole-Day Unit Policy

Effective January 6, 2021, the Board of Pharmacy has temporarily expanded its interpretation of the whole day unit increments permitted under OAC 3796:8-2-04.

Under the previous policy, the Board interpreted the rule to allow a one-day supply "up to" the whole day unit amount delineated in the rule. This interpretation was limited to the one-day supply of non-plant products; all amounts of two days' supply or more needed to be exact multiples of the whole day unit for that product. The Board now expands the interpretation to also apply to multiple days' supply, e.g. non-plant products need not contain exact multiples of the whole day unit. Days' supply amounts of THC that fall between specific days' supply increments will be rounded up.

This policy shall remain in effect for three months while the Board monitors patient response and industry impact. The policy can be accessed [here](#).

Patients with Multiple Profiles

The Board regularly receives reports from dispensaries of "multiple patient profiles found" for the same patient. These errors can **ONLY** be resolved by the OARRS staff and require research as well as time for the consolidation of the profiles to be processed. Please do not have patients contact the Board regarding these issues. Rather, email MMCPRegistry@pharmacy.ohio.gov with the patient name, date of birth, and medical marijuana identification number with each request. Some known reasons for multiple profiles for a single patient are:

1. Misspelling of patient's name
2. Multiple similar names for the same patient (e.g. James Earl Jones, James Jones, Earl Jones)
3. Incorrect date of birth, including entering the effective date of the card instead of the patient's date of birth
4. Different patient address
5. Listing n/a as patient address instead of the actual address
6. Different patient telephone number
7. Not listing a patient telephone number (e.g. blank, all 0s, all 1s, all 9s)
8. First and last name are reversed
9. Reporting the sale under the caregiver's name rather than the patient's name
10. Patient name and medical marijuana identification number do not match (e.g. patient #1 entered but with patient #2's medical marijuana identification number)

By minimizing the errors in the entry of patient profiles, you can save time and frustration for the dispensaries and the patients.

LICENSING

Licensing Administrator Change

As some of you may know, Rachael Collins moved to a new position in state government earlier this month. Grant Miller, previously the Board of Pharmacy's Patient & Caregiver Liaison, has been hired to fill the position of Licensing Administrator.

During this transition, the Licensing Department asks for your patience as it gets its new setup in place. For any licensing-related question, feel free to reach out to both Grant and Licensing Director

Dispensary Map Phone Numbers

In recent weeks, the Board has been notified that some phone numbers are displaying incorrectly [on our interactive dispensary map](#). To rectify this, the Licensing department has updated the phone numbers in a different eLicense field, one that can't be changed by a licensee via their business dashboard. Going forward, if you need the phone number for your dispensary changed on the map, please email your request to Grant.Miller@pharmacy.ohio.gov.

COMPLIANCE

Security Checks

Medical marijuana dispensaries are to ensure they keep all locks and security equipment in good working order. All security equipment must be inspected and tested at regular intervals, **not to exceed thirty calendar days** from the previous inspection, to ensure the systems remain functional. The Board is currently preparing a Dispensary System Checklist. Dispensaries can utilize the checklist when conducting the security inspections and attach it to the required log documenting such inspections and tests.

Once the Dispensary System Checklist is completed, the designated representative (DR) will be notified via email. At that time, the DR can make a request to have their assigned agent provide a copy. The use of the checklist is NOT a requirement and is only intended to assist with the required security inspections.

DISPENSARY OPERATIONS

Dispensary Participation in Events

The Board periodically receives inquiries from third parties (non-licensees) hosting events involving medical marijuana. As a reminder, if a licensee would like permission to participate in any event as a sponsor - or in any other capacity - approval must be requested through the Compliance Upload portal. The request should contain specifics regarding the event and the role the dispensary seeks to play. These events are not "pre-approved" by the Board such that any dispensary may participate without first obtaining approval for that dispensary. Approvals are based on the details provided in the submission.

Vape Pen Batteries

Patients and caregivers purchasing batteries should be routinely reminded to follow any enclosed directions for use including charging and use recommendations. Many battery-related complaints relate to patients failing to properly use the products.