



Dispensary Licensee Newsletter - February 2021

IMPORTANT UPDATES

Employees with Patient & Dispenser Accounts in the Registry

The Board has encountered several cases of employees who have both patient and dispenser accounts in the registry and have used the same email address for both. The system is not built to allow for these two different types of accounts and "ties" them together with the dispenser account superseding the patient account; therefore, the individual is unable to access their patient account even if the dispenser account is later deactivated.

Please caution all employees – particularly new employees - NOT to use the same email address for their patient and dispenser accounts.

REMINDER: Purchase Summary Table Not Appearing

The Board of Pharmacy's announcement regarding the extension of expired patient and caregiver registrations also included the detail that the Board will not be automatically renewing those registrations in the Registry. Therefore, registrants could have cards which appear expired, but are actually active under the terms of the extension.

In those situations, a patient who receives a new recommendation will not have their purchase summary table (the table showing their 90-day fill period dates) appear on their profile. This does not mean they cannot purchase medical marijuana. As long their registration is active under the terms of the extension and the recommendation is within its active timeframe, they are eligible to purchase. To find out the patient's fill periods in this situation, simply take the "Written" date in their recommendation section and [enter it into the fill period calculator](#). **Please make sure to pay attention to the amount of refills on the recommendation.**

Public Hearing on Rule Amendments

On March 12, 2021 at 11:00 a.m. via conference call, the Board will hold a [public hearing](#) regarding the Board's intent to amend certain rules related to dispensaries. The affected rules include:

Rule Number	Type	Description
3796:6-2-01	Amend	Requests for application to operate medical marijuana dispensaries.
3796:6-2-02	Amend	Applications to operate medical marijuana dispensaries.
3796:6-2-04	Amend	Medical marijuana dispensary license application evaluation.
3796:6-2-05	Amend	Number of dispensary provisional licenses.
3796:6-2-09	Amend	Medical marijuana dispensary employees generally.
3796:6-2-10	Amend	Medical marijuana dispensary certificate of operation renewal.
3796:6-2-13	Amend	Request to relocate a dispensary.
3796:6-2-14	Amend	Procedure for discontinuing business as a medical marijuana dispensary.

LICENSING

In response to the COVID-19 outbreak, the Ohio General Assembly passed HB 404 which requires all licenses/registrations to be extended until July 1, 2021. **As a result of the passage of this legislation, medical marijuana dispensary employees (Associated Key, Key, and Support) and dispensaries have until July 1, 2021 to renew.** Any license renewed after the expiration date of July 1, 2021 will be deemed expired and the employee will not be authorized to work in a licensed dispensary.

NOTE: Only licenses with an 'Active' status and expiration date of July 1, 2021 will be eligible for renewal. Any employee who has experienced a separation of employment from a dispensary and therefore has an Inactive license, must complete a reinstatement application.

Dispensary Employee License Renewal

All dispensary employee licenses for associated key employees, key employees, and support employees will be eligible for renewal through July 1, 2021. All renewal applications, materials, and payment must be submitted via eLicense Ohio. Failure to submit a timely renewal will result in the employee license expiring and the inability to work in a licensed dispensary.

The renewal fees for dispensary employee licenses are as follows:

- Associated Key Employee - \$500.00
- Key Employee - \$250.00
- Support Employee - \$100.00
- eLicense System Transaction Fee (all license types) - \$3.50

All payments must be made with Visa, MasterCard, or Discover via eLicense Ohio.

A step-by-step guide on the dispensary employee renewal applications can be found [here](#).

eLicense Guidance

All renewal applications must be filed online via the eLicense Ohio system. **It is highly recommended to use Google Chrome to access eLicense Ohio and when submitting a renewal application.**

Individuals who already have an account but forgot their password may reset it by selecting the "Forgot your password?" link on the [eLicense login page](#). A password reset link will be emailed to you. The link expires after 24 hours, so be sure to reset your password as soon as possible.

Individuals who already have an account but have not accessed the system in the last 12 months may also be required to reset their password. Follow the on-screen instructions to reset your password.

For step-by-step guidance on how to register for an account on the eLicense site, visit: www.pharmacy.ohio.gov/elicenseinstruct.

For assistance registering for an account or resetting a password in eLicense Ohio, please contact the eLicense Customer Service Center, which can be reached by calling 855-405-5514.

COMPLIANCE

REMINDER: Patient Profiles

[Per the Board of Pharmacy rules](#), patients in the Medical Marijuana Control Program are required to have a complete recommendation – which includes the full name, (Ohio) residential address, and correct phone number – before a dispensary may sell medical marijuana to that patient.

If patients are having trouble updating their address or phone number, they may (1) go to www.ohiomedicalmarijuanaregistry.com and log in using their email address and password; (2) contact their recommending physician to correct any information contained in their registration; or (3) email mmcpreistry@pharmacy.ohio.gov for assistance.

DISPENSARY OPERATIONS

Clarification - Updated Whole-Day Unit Policy

Last month's newsletter included an update on the whole-day unit policy and the following clarifies some questions the Board has received related to this topic:

The day supply that is entered in a patient's registry is to be the day supply that is associated with the Product ID of the purchased product, regardless of whether the THC Unit Content is between whole-day unit increments. This information can be found in the manifest from the cultivator or processor. The lab results are NOT to be taken in consideration for the purpose of entering the day supply. For example, if the lab results for oil for vaporization are 591.66 mg Unit THC Content and the day supply that is associated with the Product ID is a one-day supply, that is compliant because 591.66 mg is within +/- 5 % of 590. If the lab results for an oil for vaporization is 620 mg Unit THC Content, then a Product ID with 590 mg Unit THC Content is not compliant because it does not fall within +/- of 590 mg. Also, an oil for vaporization with the THC Unit Content of 620 should have a day supply of two.

Product Concept Reminder

The Board encourages licensees to submit product concepts to be reviewed prior to manufacturing the product to scale or submitting an Item for Product ID assignment. This is to ensure the Board has the necessary information to determine a product is compliant and avoid delays in reviewing Items submitted for Product ID assignment. The following are aspects to be sure to address when submitting product concepts:

- The product is one of the following authorized forms of medical marijuana: oils, tinctures, plant material, edibles, lotions, creams, and patches.
- Fulfills the metered dose requirement.
- Ensuring the product is not attractive towards children. This includes resembling a commercially available product that is marketed to children.
- The product does not create the impression that the product is sold for recreational purposes.