



Dispensary Licensee Newsletter - September 2021

IMPORTANT UPDATES

Board of Pharmacy Publishes 2021 Request for Dispensary Applications (RFA II)

On September 14, 2021, the Board of Pharmacy voted to authorize the publication of the 2021 Request for Dispensary Applications (RFA II). RFA II and Dispensary Application Instructions, a preview of the application, and all required forms can now be found under the heading **Dispensary Applications – RFA II** at www.medicalmarijuana.ohio.gov/dispensaries.

Questions related to RFA II may be submitted from September 20, 2021 until October 6, 2021 via email to rfaquestions@medicalmarijuana.ohio.gov. **Please review RFA II and all additional posted documents before submitting questions.** Individuals may submit a maximum of three questions during this First Q & A Period.

The application process will formally open on November 4, 2021 at 8:00 a.m. and close on November 18, 2021 at 2:00 p.m.

Sublingual Administration of Medical Marijuana

The Board of Pharmacy also voted to approve the administration of medical marijuana sublingually (on or under the tongue). More information will be forthcoming as the Board amends [OAC 3796:8-2-01](#) to reflect this approval.

Caregiver Registration Reminder

On August 9, 2021, the Board of Pharmacy voted to terminate the [Temporary Expansion of Caregiver Registration](#) effective September 8, 2021. Thereafter, all caregivers must be registered through a recommending physician and the Board will no longer be able to register caregivers directly. Additionally, each patient will be permitted to have up to two caregivers linked to their account and each caregiver will be permitted to have up to two patients.

Notwithstanding the two patient and two caregiver limit, a request for additional caregivers or additional patients may be made to the Board pursuant to [OAC 3796:7-2-02\(F\)](#). Additionally, the Board will not be removing existing caregivers who registered under this expansion.

Registering as Registrant & Dispenser

Dispensary employees who are also patients or caregivers in the Medical Marijuana Control Program CANNOT use the same email address to register for both a registrant and dispenser account in the Registry. Using the same email address for both accounts will prevent the individual from gaining access to their patient/caregiver profile. Separate email addresses must be used when registering a new account.

If a dispenser has already used the same email address for both accounts, please email mmcpreistry@pharmacy.ohio.gov. In the email, include the individual's name, the email address to be associated with the dispenser account, and the (different) email address to be associated with the patient or caregiver registration account.

Manual Patient Data Entry

The Board is currently reviewing Metrc and APPRISS data to verify correct patient information is being submitted via the dispensary's point-of-sale systems. Dispensary staff must be careful not to input erroneous data when manually completing patient profiles prior to dispensing. Agents have discovered instances where, instead of the required patient registration numbers being entered, staff is entering a patient's driver license number or all zeros, which is causing incomplete or erroneous data to be uploaded to the patient's OARRS/APPRISS profile. This incorrect data is then being posted to Metrc. [Rule 3796:6-3-10\(I\) of the Ohio Administrative Code](#) states:

All medical marijuana dispensing information submitted to the drug database pursuant to this rule must be reported in an accurate and timely manner.

Report of Violations

Once dispensary management becomes aware of a violation of state drug law (e.g., trafficking in drugs, possession of drugs), the Board must be notified **immediately**. The purpose of this is to ensure the agents can investigate if necessary, and provide direction and guidance to dispensary management on how to proceed.