



Ohio Department of Commerce Medical Marijuana Control Program

MMCP Guidance – Metrc Package Adjustments

Pursuant to its authority in Chapter 3796 of the Ohio Revised Code (O.R.C.) and Chapter 3796 of the Ohio Administrative Code (O.A.C.), the Ohio Department of Commerce (Department) Medical Marijuana Control Program (MMCP) is providing guidance on the use of Package Adjustments in Metrc for licensed cultivators, processors, and testing laboratories. Effective July 1, 2023, all licensees will be required to ensure appropriate and consistent use of Package Adjustments in accordance with this guidance.

As the seed-to-sale tracking system for the MMCP, the data in Metrc must be kept up to date by licensees. Occasionally, something occurs that causes the physical package and what has been recorded in Metrc to conflict and a Package Adjustment may be necessary. Such adjustment must be made in a timely manner to ensure the Metrc data is accurate and up to date pursuant to program rules.

All of the following requirements must be met when making a Package Adjustment in Metrc.

- Licensees may only use Package Adjustments as permitted in this guidance.
- Licensees must select the appropriate “Reason” based on the information provided in this guidance.
- Licensees must maintain records that fully outline what occurred that required the Package Adjustment. Licensees must provide as much detail as possible in the “Notes” field of the Package Adjustment and may reference a log or record that is maintained outside of Metrc where further information can be found.
 - Cultivation and processing records must be maintained by the licensee in accordance with O.A.C. 3796:2-2-08 and 3796:3-2-08.

The MMCP will monitor Metrc to ensure licensees comply with this guidance. Using a Metrc Package Adjustment inappropriately or outside of what is permitted in this guidance may result in retesting, administrative hold, destruction of product, or further action by the Department.

Questions may be directed to MMCPCompliance@com.ohio.gov and your assigned MMCP Agent.



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When/how are Package Adjustments permitted to be used?

Generally, Metrc Package Adjustments should be used when the physical package and what has been recorded in Metrc conflict. An accurate reason for a Package Adjustment must be provided using the appropriate "Reason" category provided in this guidance.

If you have not recorded any transaction out of the package, such as a sale or transfer of the package, or made an adjustment, you must use the "**discontinue**" feature instead of the Package Adjustment function. Discontinuing a package will clear the package and it will disappear from the user screen, allowing the user to start over.

Discontinuing a package will eliminate it permanently. Discontinued package tags cannot be recovered.

"Notes" field: Pursuant to O.A.C. 3796:2-2-04 and 3796:3-2-04, licensees must track and submit into Metrc anything the Department determines necessary for tracking medical marijuana. To comply with these rules, licensees must maintain records that fully outline what occurred to require the Package Adjustment. At a minimum, licensees must outline these details in the "Notes" section of the Package Adjustment. If there are records maintained outside of Metrc that provide further information, those should be referenced in the "Notes."

For example: Package adjusted due to destruction of expired edible product. See waste destruction log dated June 14, 2023.

Department Notification: If a theft, diversion, or loss occurs at the facility, the licensee must notify the Department and comply with O.A.C. 3796:5-4-01.

As a reminder, pursuant to O.A.C. 3796:5-2-01(H)(1), the Type 1 Key employee(s) designated by the licensee is responsible for all activities at the facility and will serve as the point of contact for the facility with the Department. Therefore, any questions or communication the Department has regarding a package adjustment will be directed to the Type 1 Key employee(s).

When is Package Adjustment use prohibited?

Package Adjustments may not be used outside of any of the reasons detailed below.

For example, do **not** use the Package Adjustment feature:

- to add anything to the medical marijuana, such as trim or frozen material.
- for any changes made to the package as a result of completion of a processing step or added ingredient.
- to move product between two packages.
- for re-packaging reasons.

What should I do instead?

The appropriate action is dependent on the situation and could include combining packages or creating a child package. If you are unsure how to proceed, contact Metrc support.



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How do I know which Package Adjustment “Reason” to use?

To adjust a package, the licensee must indicate in Metrc the reason for the adjustment. These “Reasons” are established by the Department for use by cultivators, processors, or testing laboratories, as applicable.

Licensees must follow the guidance below when determining the appropriate “Reason” for the adjustment and must use the “Notes” field to explain what occurred to require the adjustment.

If you have not yet recorded any transaction out of the package, such as a sale or transfer of the package, or made an adjustment, you must use the “discontinue” feature instead of the Package Adjustment function. Discontinuing a package will clear the package and it will disappear from the user screen, allowing the user to start over.

Discontinuing a package will eliminate it permanently. Discontinued package tags cannot be recovered.

Cultivators	
Internal Quality Control	"Internal Quality Control" must be used when medical marijuana is destroyed during internal quality control testing conducted by a licensee. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.
Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" may be used to account for changes in moisture level that occur in bulk plant material.
Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.



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Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Loss Due to Packaging Activity	"Loss Due to Packaging Activity" may be used to record a change in package weight that results from handling the product during a packaging activity, such as transferring products from one container to another.

Processors	
Internal Quality Control	"Internal Quality Control" must be used when medical marijuana is destroyed during internal quality control testing conducted by a licensee. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.
Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" must be used to account for changes in moisture level that occur in bulk plant material.



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Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Loss Due to Processing Activity	"Loss Due to Processing Activity" may be used to record a change in package weight that results from handling the product during a processing activity. This package adjustment type may not be used when the processing activity changes the form of the medical marijuana.
Loss Due to Packaging Activity	"Loss Due to Packaging Activity" may be used to record a change in package weight that results from handling the product during a packaging activity, such as transferring products from one container to another.



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Testing Laboratory	
Laboratory Testing	"Laboratory Testing" may be used to account for loss of product due to a testing activity conducted on behalf of a licensed medical marijuana cultivator or processor or an internal laboratory quality control.
Data Entry Error	"Data Entry Error" may be used to correct data entry errors that cause Metrc inventory to conflict with the physical package. This should only be used if the package is not able to be discontinued.
Plant Material – Moisture Gain/Loss	"Plant Material – Moisture Gain/Loss" may be used to account for changes in moisture level that occur in bulk plant material.
Scale Variance	"Scale Variance" is used to account for minor differences in weight when re-weighing a sample during accessioning.
Destruction – Failed Testing	"Destruction – Failed Testing" must be used when destroying products that have failed compliance testing. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Recall	"Destruction – Recall" must be used when destroying products that are under a product recall. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Expired	"Destruction – Expired" must be used when destroying products that have exceeded the expiration date on the label. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.
Destruction – Waste/Other	"Destruction – Waste/Other" must be used when destroying medical marijuana waste, or any other destruction of medical marijuana. The facility must maintain a separate record of every disposal of medical marijuana waste in addition to the package adjustment.



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Loss Due to Theft "Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.



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Ohio Statutory and Administrative Authority

- Ohio Revised Code 3796.03(C): permits the Department to establish any rules it deems necessary for the ongoing administration of the medical marijuana control program.
- Ohio Administrative Code 3796:5-6-01 and 5-6-02 permit the Department to enforce the rules and regulations established under Chapter 3796 of the Ohio Administrative Code.
- Ohio Administrative Code 3796:2-2-01, 3-2-01, and 4-2-01 mandate that licensees establish and maintain certain policies and procedures within their standard operating procedure that ensure compliance with the rules for production, storage, inventory, and transportation of medical marijuana.
- Ohio Administrative Code 3796:2-2-04, 3-2-04, and 4-2-01(D) mandate that licensees track and submit into the Metrc system any information the Department determines necessary for maintaining and tracking medical marijuana.