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## Dispensary Licensee Newsletter - November 2018

**Editor's Note:** This month we bring you an instructional video on how to use the Patient & Caregiver Registry, along with additional pre-inspection guidance.

- Board of Pharmacy's MMCP Staff

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## LICENSING

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### Designated Representatives

During the process of activating Associated Key and Key Employee applications, it has been found that several individuals are listed as the 'Designated Representative' at more than one dispensary. Per [Rule 3796:6-3-05\(C\) of the Ohio Administrative Code](#), A dispensary employee shall be the Designated Representative for no more than one dispensary location.

Please send the name of the Designated Representative and the Provisional Dispensary License Number they are associated with to [mmcp@pharmacy.ohio.gov](mailto:mmcp@pharmacy.ohio.gov).

### Licensed Employee List

It is advised that each PDL send a list to [mmcp@pharmacy.ohio.gov](mailto:mmcp@pharmacy.ohio.gov) that includes each PDL number, and includes the employee name and type (Associated Key, Key, or Support) specifically employed by each PDL, including who will be the Designated Representative for each location.

Please send this list by close of business on Wednesday, Nov. 21st.

### Employee ID Badge Update

Previously, the Board indicated employee ID badges would be sent via mail about 10 days after application approval. The Board will now be sending ID badges with your Board compliance agent during pre-inspection.

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## TECHNOLOGY & SYSTEMS

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### Update on the Patient & Caregiver Registry

This week, all three agencies involved with the Ohio Medical Marijuana Control Program updated stakeholders on the current status of the Patient & Caregiver Registry. While the Registry is not yet active, it is important that everyone is aware of how it will function.

Specifically, all dispensary employees will need to know how to interact with the Registry in order to properly verify that a patient or caregiver can be dispensed medical marijuana. The Board has published [an instructional video to guide dispensary employees through the process of navigating the Registry](#).

### System Test During Final Inspections

During a dispensary's final inspection, Board Agents will work with the PDL to conduct a full end-to-end "commissioning test" for their installed POS system to confirm that POS data can be submitted to and received from METRC. The test is also meant to confirm that required data is able to be submitted to the Ohio Automated Rx Reporting System (either automatically or manually). Further information will be made available once a PDL schedules their final inspection.

### Scanner Note

Confirmation of an individual's active Registry Card will require the use of a scanner that interfaces with the Patient & Caregiver Registry. Consequently, [Rule 3796:6-3-08 of the Ohio Administrative Code](#) requires dispensaries to use scanners approved by the Board for dispensary operations.

Board staff can confirm that there is one model of scanner known to be compatible with the Patient and Caregiver Registry: the Honeywell 1900GSR USB.

If any other type of scanner is used, it will have to be tested before it can be approved to use.

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## COMPLIANCE

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### Pre-Inspection Information

Board Agents are currently conducting dispensary pre-inspections and communicating with Designated Representatives to ensure all building requirements are completed beforehand. If you believe your dispensary is ready for a pre-inspection, please contact the Agent in your territory to schedule one.

### Record Keeping Requirements

Questions have been asked regarding positive identification when dispensing medical marijuana. Per [Rule 3796:6-3-17 of the Ohio Administrative Code](#), dispensary records may be maintained electronically and be available for inspection by the Board of Pharmacy upon request. The dispensary shall develop record keeping policies and procedures consistent with this division.

Record keeping requirements include maintaining a system to log positive identification. The rule's requirements of positive identification are as follows:

"Positive identification" means a method of identifying an individual who receives, dispenses, or destroys medical marijuana. A method may not rely solely on the use of a private personal identifier such as a password, but must also include a secure means of identification such as the following:

1. A manual signature on a hard copy record;
2. A magnetic card reader;
3. A barcode reader;
4. A biometric method;
5. A proximity badge reader;
6. A state board of pharmacy-approved system of randomly generated personal questions;
7. A printout of every transaction that is verified and manually signed within a reasonable period, but no more than forty-eight hours, by the by the responsible individual. The printout must be maintained for three years and made available on request to those individuals authorized by law to review such records; or
8. Other effective methods for identifying individuals that have been approved by the state board of pharmacy.

If you have any questions, please do not hesitate to contact your Agent or MMCP staff via email at [mmcp@pharmacy.ohio.gov](mailto:mmcp@pharmacy.ohio.gov).

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## DISPENSARY OPERATIONS

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### Updated Documents

Board staff have updated the following documents on the Licensee Resources page. Please review for any new information.

- [MMCP Advertising & Marketing FAQ](#)
- [Dispensary Foundational Training Resource Guide](#)
- [Foundational Training Attachment](#)
- [Training & Continuing Education FAQ](#)