

**Topic:** Medical Marijuana Store Patient List and Patient Registration Requirements in Metrc

**Applicable Rules:** 5-110(D), 5-120(B), 3-905(D), & 3-805

The Colorado Department of Revenue’s Marijuana Enforcement Division (MED) is issuing this Compliance Tip to highlight certain regulations, offer information, and provide guidance to Licensees regarding the state-mandated Inventory Tracking System (Metrc) patients list and patient registration requirements. This Compliance Tip is being released following a prior [Compliance Tip](#) (issued August 15, 2022) titled: “Required patient documentation for Medical Marijuana Transfers (Sales) over the statutory limits.”

**The Metrc Patients List:** This list within Metrc must include all patients who are registered with the Medical Marijuana Store as their primary Store. In compliance with MED Rule 5-110(D), additional documents must be retained by the registered Store and this list should be accurate and reconciled daily, consistent with all other Metrc regulations. **NOTE: Metrc does not communicate with CDPHE’s Medical Marijuana registry database. It is the Licensee’s responsibility to accurately enter all registered patient information into Metrc.**

**Additional Useful Tips:**

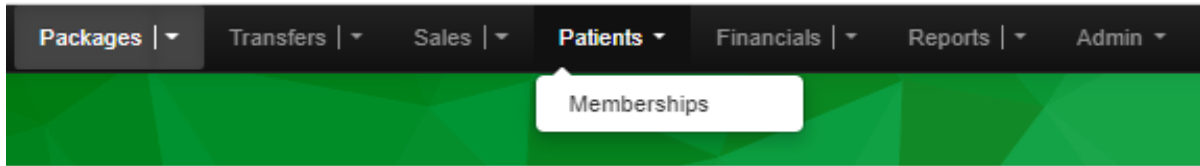
- The patient list is the only place in Metrc where daily patient limits are entered or edited. The limits entered when registering a patient impact all Transfers to that specific patient.
- The patient limits entered when registering a patient are the limits displayed on the Patient Status Lookup.
- Only a Medical Store license can update a patient’s registry card expiration date in Metrc.

**Why This Is Relevant:** MED Rule 5-110(D) requires that a physical or electronic copy of the patient’s registry card, as well as other relevant documents outlined in rule, must be retained by the registered Store, while MED Rule 3-905(D) requires accurate and comprehensive inventory tracking records that account for Transferred Regulated Marijuana. Additionally, MED Rule 5-120(B) requires Stores to only allow patients with valid registry cards into the Stores’ Restricted Access Area. Thus, patients with an expired registration card should not be allowed in the Restricted Access Area nor should they appear on a Stores’ patient list.

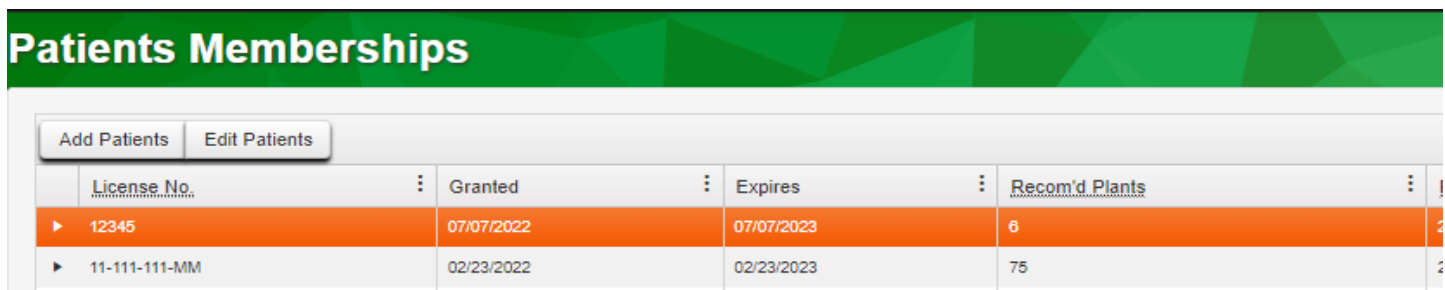
As a reminder, the MED has initiated a proactive notifications program to aid in the validity of Metrc data and will use employee contact information provided in Metrc to communicate these notifications. All email communication for this proactive notifications program will come from the email address of dor\_med\_dat@state.co.us. Please add this email address to your contacts so it is not flagged or marked as spam by your email administrator.

## Updating a Patient List in Metrc:

After reviewing the Store's patient list and comparing it to physical or electronic copies of registered patient documentation, any current employee with Metrc access and with permission for Patient Memberships can update the patient list. To make changes to the patients list, when on the Metrc homepage, select the **"Patients"** heading and then select **"Memberships"** from the dropdown list, as follows:

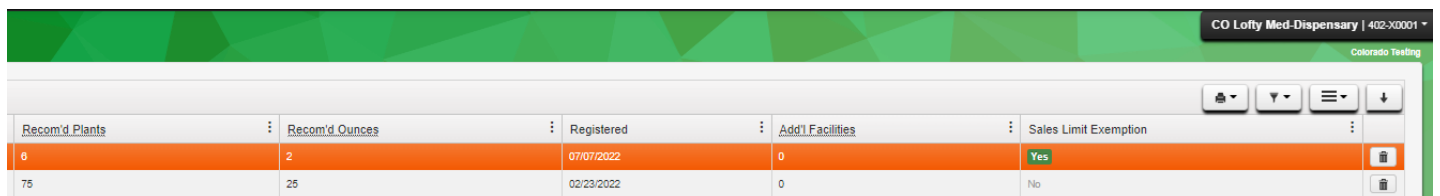


On the **"Patients Memberships"** page, navigate to the top left of the page to find the option to **"Add Patients"** or **"Edit Patients."** Highlight a patient to edit their credentials. Editing credentials will allow you to change patient information for the patient selected.



License No.	Granted	Expires	Recom'd Plants
▶ 12345	07/07/2022	07/07/2023	6
▶ 11-111-111-MM	02/23/2022	02/23/2023	75

To remove a patient completely, select the patient's number and then select the trashcan icon on the right.



Recom'd Plants	Recom'd Ounces	Registered	Add'l Facilities	Sales Limit Exemption	
6	2	07/07/2022	0	Yes	🗑️
75	25	02/23/2022	0	No	🗑️

When adding a new patient, confirm that you are providing the proper license granted and license expiration dates, consistent with the dates listed on the Medical Marijuana Registry card. Also confirm the proper allowances for the patient.

**REMINDER:** A [tangible educational resource](#) must be offered to patients or customers any time Regulated Marijuana Concentrate is sold. This requirement is separate and distinct from any labeling requirements of concentrate and would not satisfy the requirements described in Rule 3-1015(B)(2)(c).

**Previously Issued Patient-Related Industry Bulletins And Compliance Tips:**

Industry Bulletins:

- [21-11 RE: New Requirements Effective Jan. 1, 2022 \(HB21-1317 Regulating Marijuana Concentrates\)](#)
- [20-02 RE: Medical Marijuana Sales Limitations](#)

Compliance Tips:

- [Required Patient Documentation for Medical Transfers \(Sales\) Over the Statutory Limits](#)
- [Patient Registration of a Primary Medical Marijuana Center](#)
- [Sales to Patients Presenting Documentation Obtained via the CDPHE On-Line Medical Marijuana Registry System](#)