



## Compliance Tip

March 13, 2024

**Topic:** Identifying Designated Test Batch Collectors in the Inventory Tracking System

**Applicable Rules:** 4-110 (B) & 4-110(C)(1)

The Colorado Department of Revenue’s Marijuana Enforcement Division (MED) is issuing this Compliance Tip to guide Licensees regarding identifying employees as Designated Test Batch Collectors in the Inventory Tracking System (Metro). Licensees are encouraged to review Rule 4-110 in its entirety, as this Compliance Tip does not fully capture all Designated Test Batch Collector Requirements.

### **Why This Is Relevant:**

**Rules require each Regulated Marijuana Business that collects and submits Test Batches for required testing to identify two Designated Test Batch Collectors.**

“**Designated Test Batch Collector**” means an Owner Licensee or an Employee Licensee who has been designated by a Regulated Marijuana Business and completed training required by Rule 4-110 to engage in Sample Increment Collection for the purpose of creating Test Batches.

Each Regulated Marijuana Business that collects and submits Test Batches for required testing must enter the Designated Test Batch Collectors into the Inventory Tracking System (Metro). Identifying qualified Designated Test Batch Collectors (those who complete the required training and hold a signed training certificate) is important because it promotes licensee transparency and increases accountability in their sampling procedures as they pertain to the Regulated Marijuana Testing Program. Nothing in the rule requires a Designated Test Batch Collector to be employed by the Regulated Marijuana Business making the designation. For example, a Designated Test Batch Collector may be an employee of another license that has agreed to serve as a Designated Test Batch Collector for other licenses.

### **4-110 – Regulated Marijuana Testing Program: Sampling Procedures**

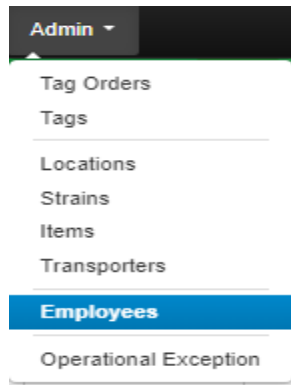
#### **C. Test Batch Collection Requirements.**

1. Required Minimum of Two Test Batch Collectors. At a minimum, two Designated Test Batch Collectors shall be involved in the collection of Sample Increments such that at least one

Designated Test Batch Collector is responsible for collecting the Sample Increments and another Designated Test Batch Collector is responsible for reviewing documentation associated with the collection of Sample Increments in a timely manner and prior to any Transfer of the Production Batch or Harvest Batch from which Sample Increments were collected. This review can be completed in person or may be completed remotely by reviewing image(s) of the Test Batch and associated documentation. ***All Designated Test Batch Collectors must be identified as such in the Inventory Tracking System account associated with the Regulated Marijuana Business.***

**NOTE:** Please follow the prompts below to identify Designated Test Batch Collectors in the Inventory Tracking System:

**The Metrc Employees Grid:** This grid within Metrc displays the current employees for the licensee. To navigate to the Employees grid, click on the “Admin” drop-down and then click “Employees”.



**Employees** CO Lotfy Med. Cultivation A | 423-1000

[Add Licensed Employees](#)
[Add Unlicensed Employees](#)
[Edit Employees](#)
[Lock](#)
[Unlock](#)

License No.	Last Name	First Name	E-mail	Status	Type	Granted	Expires	Hired	Home	Qual	Mgr.	Δ	L	Last Login
DoosTeam0101	DoosTeam	Merc	support@metrc.com	Active	Unlicensed			02/11/2020	Package	No	No	Yes	No	01/07/2024 07:06 pm
X00420	INDUSTRY ADMIN	METRC	support@metrc.com	Active	Key			05/23/2019	Plants	Yes	Yes	Yes	No	01/08/2024 03:05 pm
X00088	OWNER	DISPENSARY	support@metrc.com	Active	Associated Key	08/01/2010		05/23/2019	Plants	Yes	Yes	Yes	No	11/21/2023 02:18 pm

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Select the employee to be designated as a Test Batch Collector and then click the “Edit Employees” button.

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[Edit Employees](#)
[Lock](#)
[Unlock](#)

License No.	Last Name	First Name	E-mail	Status	Type	Granted	Expires	Hired	Home	Qual	Mgr.	Δ	L	Last Login
DoosTeam0101	DoosTeam	Merc	support@metrc.com	Active	Unlicensed			02/11/2020	Package	No	No	Yes	No	01/07/2024 07:06 pm
X00420	INDUSTRY ADMIN	METRC	support@metrc.com	Active	Key			05/23/2019	Plants	Yes	Yes	Yes	No	01/08/2024 03:05 pm
X00088	OWNER	DISPENSARY	support@metrc.com	Active	Associated Key	08/01/2010		05/23/2019	Plants	Yes	Yes	Yes	No	11/21/2023 02:18 pm

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An Edit Employees window will populate, where the selected employee can be designated as a Test Batch Collector.

Employee # 1

Employee

Employee Lic. Number

Enable online access to this Facility

E-mail

Home

Employment  Owner at this Facility  
 Manager at this Facility  
 Designated Test Batch Collector  
 Manager-Approved Sampler

**Previously Issued Industry Bulletin and Compliance Tip Regarding Designated Test Batch Collectors, Employee Lists, and Administrator Requirements in Metrc:**

- [210119 Industry Bulletin 21-02 - CAPA Recall Rules and Guidance Docs](#)
- [220804 Updated Compliance Tip Metrc Employee Lists.](#)

All MED Compliance Tips are available on the [MED Compliance Tips webpage](#).

**Reminder:** The MED has a continued proactive notification program to aid in the validity of Metrc data and will use owner/manager contact information provided in Metrc to communicate these notifications. All email communication for this proactive notification program will come from the email address 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.

If you have questions regarding this Compliance Tip, please send the MED an [inquiry](#). For questions regarding Metrc functionality, please contact Metrc Support (support@metrc.com or 1-877-566-6505). To sign up for Metrc Trainings, please visit <https://www.metrc.com/information-and-materials/support-and-training/>.