



COLORADO

Department of Revenue

Specialized Business Group—Marijuana

Updated Compliance Tip

December 2, 2020

Topic: Permitted Patient Card Formats & Medical Sale Guidelines

Applicable Rules: Rules 5-110 and 5-120, 1 CCR 212-1

Tips:

- Effective December 1, 2020, the Colorado Department of Public Health and Environment (CDPHE) has issued a new design for [Colorado Medical Marijuana Registry cards](#) [“registry card(s)”]. The previous layout of the card will still be in circulation until November 30, 2021.
- Reminders: Patients may produce their registry card(s) in the following formats for the purchase of Medical Marijuana and Medical Marijuana-Infused Product from a Medical Marijuana Store (“Store”):
 1. Digital PDF — From the patient’s online account, downloaded and saved as a PDF on a phone or tablet.
 2. Hard copy — A printed copy of the card.
- Hard copies of patient registry cards may not be materially altered in any way. For example, a registry card may not be materially altered or damaged such that it is illegible or otherwise obscured from verifying a patient’s identity or registration number. However, registry cards with normal wear (e.g., corners of a registry card are creased or folded) are acceptable so long as the wear does not render the card illegible or obscured. Registry cards may be cut or folded along the perforated line as displayed at the sample card link above.
- If a patient is presenting his or her registry card on a phone or other portable device, the PDF of the registry card must be presented. A screenshot of the patient’s profile, text image of a blank card, or photo of the hard copy is unacceptable.
- Registry cards presented in either format must be legible in the format as shown in the sample card link above.
- Prior to every sale of Medical Marijuana or Medical Marijuana-Infused Products, a Store shall also require a valid proof of identification that matches the name on the registry card presented and physically matches the individual presenting the card. Licensees must physically view and inspect each registry card and personal identification to confirm the information provided and to evaluate the authenticity of the documents presented. Acceptable forms of ID are generally defined as: a Drivers license or ID card issued by U.S. States or territories, U.S. military ID, passport, or compliant Enrollment card issued by a Federally recognized tribe. See Rule 3- 405, 1 CCR 212-3, for a list of acceptable forms of identification.

- A Store shall maintain written authorization from each registered patient that has designated the Store as its primary Store, any physician recommendation for an extended plant or ounce count, physician exemption from medical sales limitations, a copy of the patient's registry card, and a copy of the patient's proof of identification.
- A Medical Marijuana Store must choose a customer type when recording a sale in the Inventory Tracking System. The customer type options are "Patient" and "Caregiver". **A Medical Marijuana Store may, but is not required to, enter the patient or caregiver's registration number into Metrc. Although entering the registration number is not a requirement, it is highly encouraged that Medical Marijuana Stores enter the registration number with the sales details.** This helps the Division track compliance with sales limitation rules and provides more statewide data related to patient purchase patterns and the number of unique patients shopping at Medical Marijuana Stores. This helps the Division evaluate the Medical Marijuana Market more effectively on a regular basis. ***Based on statutory requirements, patient registration numbers are required to be entered into the Inventory Tracking System for home delivery of Medical Marijuana and Medical Marijuana-Infused Products.**
- CDPHE's Medical Marijuana Registry System and MED's Inventory Tracking System are two separate and distinct databases. Licensees shall not use the limited patient information stored in Metrc as a substitute for reviewing a patient's registry card for each purchase.
- CDPHE has published [answers to frequently asked questions](#) regarding the Medical Marijuana Registry System, which you can access at any time.