

Updated Compliance Tip

February 5, 2018

Topic: Web-Based Medical Marijuana Registry System and Permitted Patient Card Formats

Applicable Rules: Rules M 402 and 405, 1 CCR 212-1

Tips:

- Effective January 1, 2017, patients may produce their valid Colorado Medical Marijuana Registry cards [“registry card(s)”] in the following formats for the purchase of Medical Marijuana and Medical Marijuana-Infused Product from a Medical Marijuana Center (“Center”):
 1. A hard copy of the patient’s registry card; or
 2. A Portable Document Format (“PDF”) of the patient’s registry card presented on a phone or other portable device (see attached example).
- **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.**
- 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 screen shot 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, with an image of the state seal and wildflowers visible and reflecting the patient identification number on the lower left-hand corner of the registry card.
- Prior to every sale of Medical Marijuana or Medical Marijuana-Infused Products, a Center shall also require a currently valid proof of identification that matches the name on the registry card presented. Licensees must physically view and inspect each registry card and personal identification to confirm the information provided and to judge the authenticity of the documents presented. See Rule M 405, 1 CCR 212-1, for a list of acceptable forms of identification.
- A Center shall maintain written authorization from each registered patient that has designated the Center as its primary Center, any relative plant count waivers to support the number of plants designated for each patient, a copy of the patient’s registry card, and a copy of the patient’s proof of identification.

Licensees are responsible for ensuring they are compliant with applicable statute and rules. This Compliance Tip is not intended to be all inclusive and may not reference all statutes and rules relevant to the topic. The Division cannot provide you with legal advice. If you have legal questions, please consult with an attorney.

- The Colorado Department of Public Health and Environment’s Medical Marijuana Registry System and the Colorado Department of Revenue, Marijuana Enforcement Division’s Inventory Tracking System (Metrc[®]) are two separate and distinct databases. Licensees shall not use Metrc[®] as a substitute for a patient’s presentation of his or her registry card.
- New and amended medical and retail marijuana rules will take effect January 1, 2018, including amendments to the M 400 Series – Medical Marijuana Centers. Adopted rules can be found at the Department of Revenue, Marijuana Enforcement Division’s website, at the following link: <https://www.colorado.gov/pacific/enforcement/med-rules>
- The Colorado Department of Public Health and Environment has published answers to frequently asked questions regarding the Medical Marijuana Registry System, which can be found at the following link: <https://www.colorado.gov/pacific/cdphe/medical-marijuana-online-registration-system-frequently-asked-questions-faq>

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