



Compliance Tip

March 15, 2017

Topic: Medical Marijuana Center Sales to Patients Presenting Documentation Obtained via the CPHE On-Line Medical Marijuana Registry System

Applicable Statutes: (§ 12-43.3-402 (5) C.R.S.)

Applicable Rules: 1 CCR 212-1 M 402 & M 405

Tips:

- As of January 1, 2017, Patients are able to generate legitimate Colorado Medical Marijuana Registry cards on personal printers. The Medical Marijuana Registry program is administered by the Colorado Department of Public Health and Environment (CDPHE) [Medical Marijuana Registry](#).
- When making a sale of Medical Marijuana or Medical Marijuana Product to a patient, Centers are expected to ensure that the Medical Marijuana Registry card presented is consistent with [samples of the card](#) provided by CDPHE **and** that the patient presents a valid photo ID in compliance with rule **M 405 (B)**. Center sales staff will find the registry number on the bottom left quadrant of the card, on both the self-printed cards **and** cards produced by the Colorado Department of Public Health and Environment (CDPHE).
- Using the new web-based system, patients are able to change their Caregiver or designate a Primary Center *at any time* and immediately print a new card. This **does not** affect a Medical Marijuana Center's mandate to follow rule **M 402 (B)**; Centers shall not register as a patients' Primary Center if the patient has designated *another* Center in the preceding 30 days.
- Centers may also accept *new patient* Medical Marijuana Registry applications that have been printed on personal printers. Again, Center staff is expected to ensure the documentation presented is consistent with [samples of new patient applications](#) provided by CDPHE.
- New patient applications may only be used to purchase Medical Marijuana and Medical Marijuana Products, within the 35-days *immediately following submission* of the application (**M 405 (A) (2)**). An application submitted to CDPHE via the website will **not** require a certified mail receipt for purchase. Use the patient's registration ID number (found in the second line of the "Registration Information" section at the top of the first page of the document) to check the [CDPHE webpage](#) to ensure that the application has not been denied (https://www.colorado.gov/pacific/sites/default/files/CHED_MMR_List_Revoked_Cards-Denied_Apps_12-9-16%20.pdf).

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 include all statutes and rules applicable to the Topic. Further, the Division is not able to provide you with legal advice. If you have any legal questions, please consult with an attorney.

- Medical Marijuana Centers may only sell marijuana and marijuana products to patient presenting a new application between 8:00AM – 5:00PM, Monday through Friday (**§ 12-43.3-402 (5) C.R.S.**). In accordance with **M 405 (C)**, *each time* registry application documentation is used to purchase Medical Marijuana or Medical Marijuana Products, Center sales staff must confirm that the application has not been denied by checking the [CDPHE Revoked Cards and Denied Applications](https://www.colorado.gov/pacific/sites/default/files/CHED_MMR_List_Revoked_Cards-Denied_Apps_12-9-16%20.pdf) webpage: (https://www.colorado.gov/pacific/sites/default/files/CHED_MMR_List_Revoked_Cards-Denied_Apps_12-9-16%20.pdf).
- Patients may **not** use Medical Marijuana *Renewal* Applications to purchase Medical Marijuana or Medical Marijuana Products from a Center (**§ 12-43.3-402 (5) C.R.S.**).
- The CDPHE Medical Marijuana Registry System and the Colorado Department of Revenue Marijuana Enforcement Division Inventory Tracking System (Metrc[®]) are two separate and distinct, **confidential** databases. Metrc[®] is NOT intended to be used as a patient registry card number *verification* tool.
- Medical Marijuana Centers *are not* expected to purchase equipment to scan the barcodes printed on the registry cards. There is no requirement that Centers obtain any information from the barcodes on registry cards.
- Links to information regarding the new Medical Marijuana Registry documentation is available on the [MED Statistics and Resources webpage](https://www.colorado.gov/pacific/enforcement/statistics-and-resources) (<https://www.colorado.gov/pacific/enforcement/statistics-and-resources>) under **CDPHE Medical Marijuana Registry Information**. *

*This information was updated on December 13, 2017

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