



Oregon Medical Marijuana Program (OMMP)
Judiciary Committee Presentation
Marijuana Diversion Issues
September 26, 2018, 2pm

Overview:

The OMMP, established within the Public Health Division (PHD) of the OHA, registers and regulates medical marijuana patients, caregivers, medical marijuana growers, grow sites, processors and dispensaries. Since the beginning of recreational licensing by OLCC, OMMP registrations have significantly declined.

Registrations as of September, 2018

Patients	Caregivers	Growers	Grow Sites	Dispensaries	Processing Sites
36,584	14,942	17,830	14,565	5	3

Registrations from October, 2016

Patients	Caregivers	Growers	Grow Sites	Dispensaries	Processing Sites
68,032	29,770	37,847	27,200	425	117

New Laws to Address the Tracking of Medical Marijuana:

Since 2016, medical marijuana growers, dispensaries and processors have been required to report inventory and transfer information to OMMP once a month. In 2017 and 2018, legislation was passed (SB 1057, 2017 and SB 1544, 2018) requiring all medical dispensaries, processing sites and medical grow sites with more than two patients or more than two growers to begin using OLCC’s Cannabis Tracking System (CTS) by July 1, 2018.

Outreach:

The OMMP conducted an outreach campaign to inform all growers, dispensaries, and processing sites of the new tracking requirements.

- Information on the new tracking requirements was mailed to all registrants.
- Targeted letters were sent to growers at grow sites required to use CTS.
- Webinars were provided.
- In-person outreach was conducted around the state by OMMP staff and in partnership with OLCC.

Compliance Activities:

- 2,171 warning letters were sent to growers notifying them that they were not yet complying with the new tracking requirements.
- 570 Notices of Proposed Revocation were sent to those growers who received the warning letters and did not comply with the tracking requirements.

- To date, OMMP has issued 270 Final Orders revoking registrations and will continue to enforce compliance with the tracking requirements.
- OMMP notifies law enforcement of all revoked grow sites as required by law (ORS 475B.888).

Grow Site Inspections:

OMMP's compliance unit has five inspectors to conduct all inspections, investigations or complaints throughout the state.

2017

- In the Fall of 2017 OMMP conducted 58 grow site inspections, focusing on large grow sites.

2018

- Through August of 2018, conducted 142 grow site inspections.
- Focused inspections on grow sites that reduced the number of patients to avoid CTS tracking, the goal was to ensure that plant numbers were reduced accordingly.
- Inspectors will continue to inspect grow sites in all regions of the state as well as conduct complaint-based investigations where there is a concern to public health and safety.
- The objective is to perform enough inspections to create a deterrent against non-compliance.

Program Assessment:

Earlier this year, the program conducted an internal assessment and presented the findings to the newly formed Oregon Cannabis Commission. Areas for improvement include:

- The need to ensure registrants are complying with reporting requirements.
- The ability to verify grow site addresses to ensure the addresses are valid.
- The need for adequate compliance staffing to conduct inspections of grow sites.