



MISSOURI DEPARTMENT OF
HEALTH &
SENIOR SERVICES

**Microbusiness
Welcome Meeting**



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Welcome and Opening Remarks

Amy Moore
Division Director

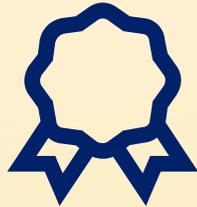
Andrea Balkenbush
Division Deputy Director

Welcome and Logistics

- **DCR Directors Welcome**
- **Executive Team Introductions**
- **Overview of the Agenda and Meeting Objectives**
- **Department of DCR Philosophy**
- **Staff Introductions**

**SCE - Bureau of
Business
Licensing
Services**

Sarah Burch
Bureau Manager



**SCE - Bureau of
Facility
Compliance**

Geoff Jones
Bureau Manager



**SCE - Program
Development Unit**

Lindsey Rutz
Manager



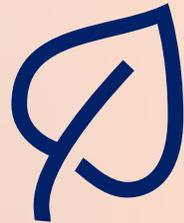
**Section for
Patient and
Application
Services**

Erica Ziegler
Section Director



**Section for Compliance
and Enforcement (SCE)
Leadership**

Jennifer Zamkus
Section Director
Brittany Kirkweg
Section Deputy Director



Metrc

Thaddeus Bowie
Director, Customer
Success



**Team Member
Introductions**



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Section for Compliance and Enforcement

Overview

Jennifer Zamkus
Section Director

DCR Regulatory Functions

Division of Cannabis Regulation	
Updated 2/2024 Division Director: Amy Moore Deputy Director: Andrea Balkenbush Executive Support: Jennifer Nelp Phone: 573-751-6234	
Director's Office	<p>DCR Director and Deputy Director oversee the implementation of Article XIV and associated rules that govern legal cannabis in Missouri.</p> <p>Public Outreach Director The Public Outreach Director serves as a liaison between the Division and the public, licensees, applicants, and other stakeholders throughout the state. Priorities include providing education and information about the cannabis industry, creating opportunities for collaboration, and working with licensees on the challenges and successes of the industry.</p>
	<p>Office of Operational Support The Office of Operational Support provides services to support the Division of Cannabis Regulation including budget, financial services and management, procurement, and human resource support. The office is responsible for coordinating the continuity of operations planning, website development, and required reporting such as the Annual Report to the Governor. Additionally, the office provides professional development opportunities for staff.</p> <p>Office of Business Opportunity The Office of Business Opportunity is responsible for development and implementation of programs to inform the public of microbusiness application opportunities through public education, targeted technical assistance, and making resources available to potential applicants. The Chief Equity Officer oversees the office and is charged with certifying that microbusiness licenses are awarded to and operated in good standing by eligible individuals.</p>
Section for Patient & Application Services	<p>Individual Licensing Unit The Individual Licensing Unit (ILU) serves DCR as the frontline team responding to call center and email inquiries. Responsible for processing and approval of patient, caregivers, consumer cultivation, and agent ID applications, ILU specializes in patient education based on existing law and regulation and provides technical support to assist applicants with the online registry portal.</p> <p>Facility Application Services Unit The Facility Application Services Unit (FAS) conducts initial processing and approval of facility application types. FAS specializes in areas of law and regulation specific to facility application requirements and provides technical support to assist facility applicants with the online registry portal.</p>
	<p>The Section for Compliance and Enforcement (SCE) is responsible for the coordination, review, and implementation of licensee compliance and enforcement duties as required by Article XIV and 19 CSR 100-1.</p> <p>Program Development Unit PDU is responsible for researching and developing SCE policy and procedure, ensuring consistency in SCE communications, and providing guidance for internal and external audiences. PDU also coordinates the data systems, reports, and other administrative functional areas of the Section.</p> <p>Bureau of Investigation and Enforcement BIE reviews complaints, conducts investigations, and pursues enforcement actions to ensure licensees and individuals with Department-issued authorizations adhere to rules and law within the Department's jurisdiction.</p> <p>Bureau of Business Licensing Services BLS verifies eligibility for licensure, processes business change applications associated with licensees, and conducts an annual audit of licensee information.</p> <p>Bureau of Facility Compliance The Bureau of Facility Compliance (BFC) is responsible for verifying licensees' compliance associated with facility operations. Within BFC there are three units that carry out the work of the Bureau. Included are the Facility Compliance Unit (FCU), Compliance Assessment Unit (CAU), and Testing & Research Unit (TRU)</p> <ul style="list-style-type: none"> • Facility Compliance Unit <ul style="list-style-type: none"> ◦ FCU verifies cultivation, dispensary, manufacturing, transportation licensee, and seed to sale system compliance through inspections, compliance monitoring, statewide track and trace system reviews, education, and violation issuances and resolution. • Compliance Assessment Unit <ul style="list-style-type: none"> ◦ The Product Compliance Team verifies compliance with marijuana product packaging and labeling rules for any new or changed product packaging through the Item Approval process. The Facility Development Team intakes and processes Commencement Inspection requests with the assistance of FCU and TRU. • Testing & Research Unit <ul style="list-style-type: none"> ◦ TRU verifies testing licensee compliance through inspections, compliance monitoring, statewide track and trace system reviews, education, and violation issuances and resolution. TRU provides research to DCR and coordinates activities with the state reference lab to ensure patients and consumers have safe access to marijuana product.
Section for Compliance & Enforcement	

Division of Cannabis Regulation

Leadership



Sharlet Kroll
Office Chief



Jennifer Zamkus
SCE Director



Tara McKinney Public
Outreach Director



Amy Moore
Division Director



Andrea Balkenbush
Division Deputy
Director



Erica Ziegler
PAS Director



Abigail Vivas Chief
Equity Officer



Brittany Kirkweg
SCE Section Deputy



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

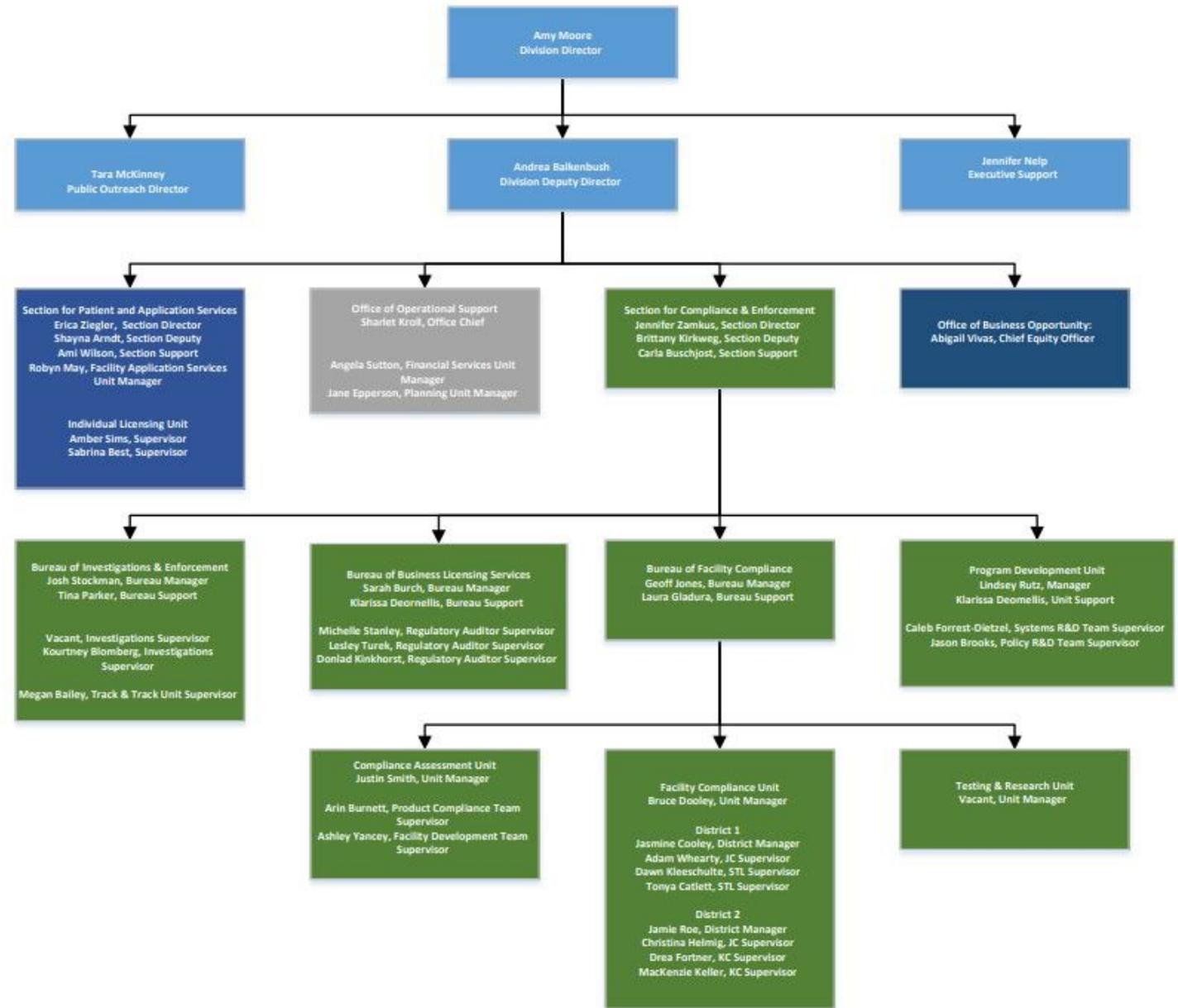
Division of Cannabis Regulation



Shayna Arndt
PAS Section Deputy

DCR Organizational Chart

DCR Functions and Organizational Chart can be found on the [Cannabis Regulation](#) page.



Contact Information

Division of Cannabis Regulation

PO Box 570
Jefferson City, MO 65102-0570

Toll-Free Access Line: **866-219-0165**
(9:00 am – 4:00 pm CST Monday – Thursday)

Email for general inquiries:
Cannabisinfo@health.mo.gov

Join our Email List

[DCR Regulation Functional Listing](#)



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Section for Compliance and Enforcement

Rules and Regulations

Brittany Kirkweg
Section Deputy Director

Article and Rule

Article XIV [Click Link Above]

Rule 19 CSR 100-1 [Click Link Above]



XIV Section 2. Marijuana legalization, regulation, and taxation. — 1. Purpose. The purpose of this section is to make marijuana legal under state and local law for adults twenty-one years of age or older, and to control the commercial production and distribution of marijuana under a system that licenses, regulates, and taxes the businesses involved while protecting public health. The intent is to prevent arrest and penalty for personal possession and cultivation of limited amounts of marijuana by adults twenty-one years of age or older; remove the commercial production and distribution of marijuana from the illicit market; prevent revenue generated from commerce in marijuana from going to criminal enterprises; prevent the distribution of marijuana to persons under twenty-one years of age; prevent the diversion of marijuana to illicit markets; protect public health by ensuring the safety of marijuana and products containing marijuana; and ensure the security of marijuana facilities. To the fullest extent possible, this section shall be interpreted in accordance with the purpose and intent set forth in this section.

This section is not intended to allow for the public use of marijuana, driving while under the influence of marijuana, the use of marijuana in the workplace, or the use of marijuana by persons under twenty-one years of age.

2. Definitions.

(1) “**Church**” means a permanent building primarily and regularly used as a place of religious worship.

(2) “**Comprehensive facility**” means a comprehensive marijuana cultivation facility, comprehensive marijuana dispensary facility, or a comprehensive marijuana-infused products manufacturing facility.

(3) “**Comprehensive marijuana cultivation facility**” means a facility licensed by the department to acquire, cultivate, process, package, store on site or off site, transport to or from, and sell marijuana, marijuana seeds, marijuana vegetative cuttings (also known as clones) to a medical facility, comprehensive facility, or marijuana testing facility. A comprehensive marijuana cultivation facility need not segregate or account for its marijuana products as either non-medical marijuana or medical marijuana. A comprehensive marijuana cultivation facility’s authority to process marijuana shall include the creation of prerolls, but shall not include the manufacture of marijuana-infused products.

(4) “**Comprehensive marijuana dispensary facility**” means a facility licensed by the department to acquire, process, package, store on site or off site, sell, transport to or from, and deliver marijuana, marijuana seeds, marijuana vegetative cuttings (also known as clones), marijuana-infused products, and drug paraphernalia used to administer marijuana as provided for in this section to a qualifying patient or primary caregiver, as those terms are defined in section 1 of this Article, or to a consumer, anywhere on the licensed property or to any address as directed by the patient, primary caregiver, or consumer and consistent with the limitations of this Article and as otherwise allowed by law, to a comprehensive facility, a marijuana testing facility, or a medical facility. Comprehensive dispensary facilities may receive transaction orders at the dispensary directly from the consumer in person, by phone, or via the internet, including from a third party. A comprehensive marijuana dispensary facility need not segregate or account for its marijuana products as either non-medical marijuana or medical marijuana, but shall collect all appropriate tangible personal property sales tax for each sale, as set forth in this Article and provided for by general or local law. A comprehensive marijuana dispensary facility’s authority to process marijuana shall include the creation of prerolls.



RULES OF
**Department of Health and Senior
Services**
Division 100—Division of Cannabis Regulation
Chapter 1—Marijuana

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Microbusiness and Rule

All Sections of Rule Apply to Microbusinesses

19 CSR 100-1.010

Definitions

19 CSR 100-1.020

Generally Applicable Provisions

19 CSR 100-1.110

Testing

19 CSR 100-1.030

Complaints, Inspections and Investigations

19 CSR 100-1.120

Packaging, Labeling, and Product Design

19 CSR-1.060

Facility Applications

19 CSR 100-1.130

Inventory Control and Seed-to-Sale Tracking

19 CSR-1.070

Facility Ownership and Employment

19 CSR 100-1.140

Transportation and Storage

19 CSR-1.080

Facility Employee Training

19 CSR 100-1.150

Marijuana Waste and Disposal

19 CSR-1.090

Facility Security

19 CSR 100-1.160 thru 1.180

Cultivation, Manufacturing, and Dispensary Facilities

19 CSR-1.100

Facilities Generally

19 CSR 100-1.190

Microbusinesses

Variance and Waiver Authority

“Variance” means an alternate requirement from a rule or specific provision of a rule which, if approved by the department, allows a licensee to be considered compliant with the rule or specific requirement of rule by complying with the approved alternate requirement

“Waiver” a department exemption from compliance with a rule or specific provision of a rule which, if approved by the department, allows a licensee to be considered compliant with the exempted rule or specific provision of rule.

19 CSR 100-1.020(1)(A)

(A) The department may waive or vary from, at its discretion and for good cause, provisions of this chapter, on its own initiative or by request.

Variances made by the Department can be found on the DHSS website on the [Facility Communications and Guidance](#) page.

19 CSR 100-1.020(1)(B)(C)

(B) Requests for a waiver or variance from the requirements of any provision of this chapter shall be made in writing.

Requests shall include—

1. An administrative and processing fee of one hundred dollars (\$100);
2. A list of each requirement and specific rule for which a variance or waiver is requested;
3. A detailed explanation for why the applicant, ID card holder, or licensee believes there is good cause to vary from or waive the requirement; and
4. For a variance, a description of an adequate alternative the entity will implement in lieu of the rule requirement.

(C) No waiver or variance request is approved unless the department issues a written approval.

Variance Request Forms can be found the DHSS website on the [Facility License and Compliance](#) page.

Complaints

19 CSR 100-1.030(1)

- (1) Complaints. The department may receive complaints related to any medical or marijuana facility or licensee, or any individual holding a department issued identification card. Complaints may be submitted using [complaint forms](#) on the department website.
- (A) Upon receipt of a complaint, the department will determine whether the allegations in the complaint warrant further investigation. The department can either close the complaint or conduct an investigation.
- (B) If the department determines a complaint against a licensed facility warrants further investigation, the department will advise the licensee of the nature of the allegations in the complaint and provide the licensee with opportunity to respond.
- (C) Current and former employees, contractors, owners, and volunteers of a licensee who, in good faith, report potential rule violations to the department may not be subjected to retaliation of any kind by the licensee because of their report.

A screenshot of the 'Medical Marijuana Facility License & Compliance Complaint Form'. The form is titled 'MEDICAL MARIJUANA FACILITY LICENSE & COMPLIANCE COMPLAINT FORM' and includes sections for 'COMPLAINT CONTACT INFORMATION' and 'COMPLAINT DETAILS'. It features a header with the Department of Health Services logo and navigation buttons for 'Home', 'Forms', and 'Help'.

Medical Marijuana Facility License & Compliance Complaint Form

A screenshot of the 'Medical Marijuana Physician Complaint Form'. The form is titled 'MEDICAL MARIJUANA PHYSICIAN COMPLAINT FORM' and includes sections for 'COMPLAINT CONTACT INFORMATION' and 'COMPLAINT DETAILS'. It features a header with the Department of Health Services logo and navigation buttons for 'Home', 'Forms', and 'Help'.

Medical Marijuana Physician Complaint Form

A screenshot of the 'Patient/Caregiver Complaint Form'. The form is titled 'PATIENT/CAREGIVER COMPLAINT FORM' and includes sections for 'COMPLAINT CONTACT INFORMATION' and 'COMPLAINT DETAILS'. It features a header with the Department of Health Services logo and navigation buttons for 'Home', 'Forms', and 'Help'.

Patient/Caregiver Complaint Form

Guidance

Microbusiness Information

DHSS Home » Licensing & Regulations » cannabis » microbusiness



Guidance for Applicants



Eligibility Information



How to Apply



Frequently Asked Questions



Outreach and Education



Business Resources

Microbusiness Guidance provided by the Department can be found on the DHSS website on the [Microbusiness Information](#) page.

Facility Communications and Guidance

DHSS Home » Licensing & Regulations » cannabis » Facility Communications and Guidance

Tracking Daily Operations

Anytime a licensee encounters an issue using an integrated seed-to-sale system, the licensee may continue to track their daily operations directly in Metrc.

Please contact CannabisDevelopment@health.mo.gov to report system issues that are limiting a licensee's ability to maintain operations.

Packaging, Labeling, Product Design and the Item Approval Process

- [FAQs 19 CSR 100-1.120\(1\)\(C\) – 03.08.24](#) (03/12/2023)
- [Packaging, Labeling and Product Design Guide – 07.20.2023](#) (7/20/2023)
- [Item Approval Process Efficiencies - 01.03.24](#) (01/03/2024)

FAQs

- [Item Submittal Guidance - 09.15.23](#) (9/18/2023)
- [Item Approval Integration Questions](#) (8/31/2023)
- [Packaging and Labeling FAQs – 08.24.23](#) (8/25/2023)

Guidance

- [Sativa, Indica, and Hybrid terms on packaging – 02.27.24](#) (2/27/2024)
- [Packaging and Labeling Extension – 02.16.24](#) (2/22/2024)
- [Item Approval Photo Guidance - 09.08.23](#) (9/8/2023)
- [Creating Template Items – 09.01.23](#) (9/1/2023)
- [Item Category Guidance – Metrc – 07.20.2023](#) (7/20/2023)
- [Item Naming Guidance – Metrc – 07.20.2023](#) (7/20/2023)
- [Packaging, Labeling and Product Design Guidance - 07.06.2023](#) (7/6/2023)
- [Packaging Color Guidance and Variance Extension - 06.07.2023](#) (6/7/2023)

General Facility Guidance provided by the Department can be found on the DHSS website on the [Facility Communications and Guidance](#) page.



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Section for Patient and Application Services

Overview

Erica Ziegler
Section Director

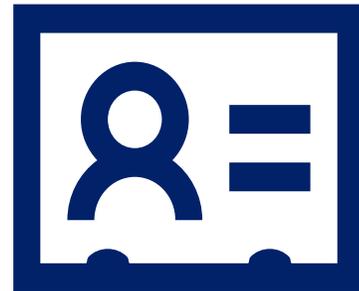
Section for Patient and Application Services

The front line of DCR. The Section handles intake of public inquiries, as well as processing all marijuana ID applications.



Application Assistance

Assist all applicants from application submission through licensing.



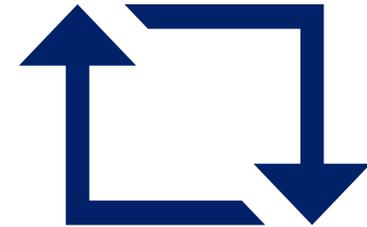
Agent IDs

Process all Agent ID requests from application submission through licensing.



Annual Payments

Receive and process all licensee annual payments.



Renewals

Receive and process all licensee renewals and payments.

A large teal circular graphic with a white center, resembling a stylized 'C' or a ring. The teal ring is thick and positioned around the perimeter of the white circle.

Overview
Agent IDs



AGT000076



**MEDICAL MARIJUANA
QUALIFYING AGENT**

Jason Girnes

Date of Birth: 09/30/1978

EFFECTIVE DATE	EXPIRY DATE
10/26/2022	11/04/2025

THIS IDENTIFICATION CARD IS THE PROPERTY OF THE STATE OF MISSOURI AND HAS BEEN ISSUED FOR THE EXCLUSIVE USE OF THE INDIVIDUAL WHOSE NAME APPEARS ON THE FRONT. IT IS NOT TRANSFERABLE AND SHALL BE SURRENDERED UPON TERMINATION OF PARTICIPATION. REPORT ITS LOSS, DESTRUCTION, OR THEFT PROMPTLY TO THE STATE. IF FOUND PLEASE DESTROY.

2281/6/1667591580402



Rule

19 CSR 100-1.070(2) Facility Employment



Who should apply?

Employees, contractors, owners and volunteers having access to a medical or marijuana facility.



When to apply?

After commencement inspection is scheduled or prior to beginning employment.



How to apply?

DHSS Home » Licensing & Regulations » Cannabis » [Facility Agent ID - How to Apply](#)



How long is an Agent ID valid?

Agent ID cards are valid for three (3) years.

NOTICE: Currently, the Department does **not** require facility agent ID applicants to submit fingerprints for a criminal history background check.

The Department has been directed by statute to require fingerprint submission to screen agent ID applicants for disqualifying felony offenses and will post to its website additional information prior to resuming this requirement.

- *Section for Patient and Application Services*





MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

QUESTIONS?



CannabisInfo@health.mo.gov



866.219.0165 M-Th | 9am-4pm



health.mo.gov/safety/cannabis

BREAK | NETWORKING





MISSOURI DEPARTMENT OF
HEALTH &
SENIOR SERVICES

Bureau of Business Licensing Services

Microbusiness Welcome Meeting

Sarah Burch
Bureau Manager

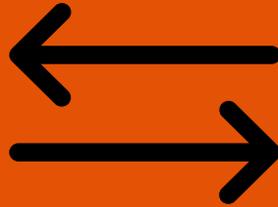
Bureau of Business License Services (BLS)

Our Purpose



Verification

BLS verifies compliance with application requirements – Minimum Standards/ Eligibility Review.



Change Applications and Licensee Updates

BLS processes ownership and location business change applications. Facilitate licensee updates such as Designated Contact and legal/fictitious names.



Enforcement

BLS monitors licensees for compliance with rules, issues Notices of Violation and further enforcement actions for non-compliance.



Customer Service

BLS Specialists serve as a resource for licensees; get to know your assigned specialist and please reach out.

Bureau Structure



Bureau Organization

- Each licensee has been assigned to a Business Licensing Services Specialists.
- Specialists have introduced themselves to you by email
- Most of our Specialists are here today – please introduce yourselves!

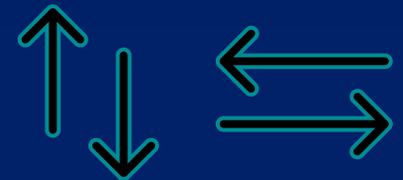


Business Change Applications

19 CSR 100-1.100(2)

19 CSR 100-1.100(2) Marijuana Facility Business Change Applications addresses change application requirements applicable to Microbusinesses. There are 4 types of changes that licensees must apply for and obtain DCR approval before they may execute:

- a) Transfer of license to a different entity with the same ownership
- b) Changes that result in an individual becoming an owner that wasn't an owner before
- c) Changes that result in a 50% or more overall change to financial or voting interest, including full asset transfers
- d) A change to the licensee's facility or warehouse location



Transfer of License to Different Entity with Same Ownership

19 CSR 100-1.100(2)(A)

Licensees may choose to transfer the license to a different entity but retain ownership.

Submission Requirements:

- Narrative description of proposed change
- Current legal and fictitious names
- Proposed new legal and fictitious names
- All owners and their percentage (should support that ownership is unchanged)
- Visual representation of ownership (should also support same ownership)
- Processing Fee \$1,000.00

MICROBUSINESS, Inc.



BETTER MICROBIZ, LLC

Changes that result in an individual becoming an owner who wasn't an owner before

19 CSR 100-1.100(2)(B)

When an individual acquires financial (FI) or voting interest (VI) amounting to 10% or more of a license, licensees must first apply for the change and receive approval before executing the FI or VI interest transfer.

Submission Requirements

- Narrative description of proposed change
- All current and proposed owners
- Visual representation of the proposed ownership structure
- Chart comparing the current and proposed ownership
- Verification that the change will not result in common control with testing lab
- Attestation that all individuals subject to background check for DFO will submit fingerprints within two weeks.
- If the proposed change affects eligibility, provide documentation sufficient to demonstrate eligibility of new owners/individuals contributing to the majority
- Processing fee of \$2,500.00

John Smith 9.9% (non-owner)



John Smith 14.9% (owner)

Overall change in ownership interests of 50% or more (including full asset transfers)

19 CSR 100-1.100(2)(C)

Such applications can only be made once the licensee has received approval to operate from DCR.

Licensees may make smaller, incremental changes to financial or voting interest of the license. When the licensee prepares to make the change that will put them past the 50% threshold, they must first submit a business change application and receive DCR approval prior to executing the change. This business change application should include all of the incremental changes that have occurred since the last ownership approved by DCR.

OR, prior to execution of a Full Asset Transfer, licensees and transferees must both submit business change applications, documentation and fees to support the change.



Overall change in ownership interests of 50% or more (including full asset transfers)

19 CSR 100-1.100(2)(C)

(Continued)

Submission Requirements:

- Narrative description of proposed change
- All current and proposed owners
- Chart comparing the current and proposed ownership
- Visual representation of the proposed ownership structure
- Verification that the change will not result in common control with testing lab
- Attestation that all individuals subject to background check will submit fingerprints within 2 weeks.
- Documentation sufficient to demonstrate eligibility of new owners/individuals contributing to the majority
- Full asset transfers should also include the following:
 - Asset purchase agreement
 - Merger, sale, transfer, MOU, or other like agreements that exist between the licensee and transferee
 - Brand, management, consulting agreements or contracts – current or proposed
 - Location lease agreement or proof of ownership
- Processing fee of \$4,000.00 – both licensee and transferee

Change of Licensee's Facility or Warehouse Location

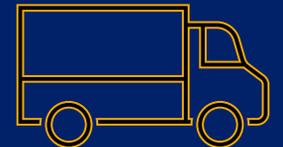
19 CSR 100-1.100(2)(D)

Licensees submit a business change application for proposed location and must pass a commencement inspection at the new location prior to relocation.

Submission Requirements:

- Narrative description of proposed change
- Proposed blueprints that outline the entire facility and feature all rooms and areas clearly labeled, including purpose and square footage, camera locations, limited access areas and access permissions.
- Documentation from the local government with jurisdiction over the facility's location confirming that the proposed location complies with local distance requirements or stating that there are none.
- If the local government in which the facility will be located has enacted applicable zoning restrictions, documentation from the local government with jurisdiction over the facility's location confirming that the proposed location complies with applicable zoning restrictions.
- Location lease agreement and/or proof of ownership.
- Processing fee of \$2,500.00

Pursuant to 19 CSR 100-1.100(1)(D), microbusiness will only be approved to relocate within the **congressional district** in which they were **originally licensed**.



Business Change Application Checklists



<https://health.mo.gov/safety/cannabis/business-change-app.php>

General Instructions and Considerations

Licensees should complete the appropriate Business Change Application Checklist below. All documents, including the completed checklist, should be uploaded to the **online registry portal** .

- **Change the Licensee's Facility Location** 
- **Changes that Would Result in an Individual Becoming an Owner of the Licensed Entity Who Was Not Previously an Owner** 
- **Change of Overall Ownership Interests of Fifty Percent (50%) or More from the Last Approved Ownership of the Licensee** 
- **Transfer a License to a Different Entity with the Same Ownership** 
- **Full Asset Transfer of License to Different Entity (Licensee Checklist)** 
- **Full Asset Transfer of License to Different Entity (Transferee Checklist)** 

Microbusiness Update



All business change applications must be submitted via the Online Registry System, except in the case of a full asset transfer, the transferee will be instructed to email their application and documentation.

A screenshot of a web application interface titled "New Application". The interface has a green header bar with a close button (X) on the right. Below the header, a light blue box displays the text "You are creating a new application for: SJB". The main content area features six application options, each represented by a green-bordered box with a document icon and text: "New Warehouse", "New Microbusiness", "Microbusiness Update" (which is highlighted with a solid green background), "New Business", "Business License Renewal", and "Business License Update". At the bottom of the interface, a light blue box contains an information icon and the text "Please switch accounts if you want to create an application for a different person or business." In the bottom right corner, there is a green button labeled "CREATE APPLICATION".



BUSINESS CHANGE APPLICATION NOTES

- Business Change Applications will be evaluated upon receipt. If a business change application is substantially incomplete or lacks a processing fee, DCR will deny the application and licensees may reapply when they are prepared to submit a complete application.
- Specialists will almost always reach out to the Designated Contact for additional documents and/or information. Licensees have 7 days ([per 19 CSR 100-1.030\(2\)\(B\)3](#)) to provide requested information. If a licensee does not provide the requested documents and information **within 7 days**, the application will be denied, and the licensee may reapply when they are prepared to provide the information. If additional time is needed, please reach out to your Specialist before the 7-day deadline.
- Change applications are processed in the order they are received. Status updates may be obtained by contacting your assigned Specialist.
- If any ownership changes are contemplated that impact the eligible majority, licensees should reach out immediately to their Specialist for further instructions.

OPERATIONAL DEADLINE

19 CSR 100-1.100(2)

Pursuant to 19 CSR 100-1.100(4)(E), microbusiness licensees must receive approval to operate **within two (2) years** of issuance. Absent a granted waiver or variance, licenses may be revoked or sanctioned if not operational and active within the required time frame.

Pursuant to 19 CSR 100-1.020(1)(A), DCR may, at its discretion, extend the operational deadline for good cause.

- Extension approvals beyond what is outlined in rule will likely be in the form of an **agreement with DCR that may include a schedule of penalties** if operational milestones are not met. Variance requests for extension of the operational deadline should be submitted prior to the Licensee's operational deadline
- A variance request will be reviewed once DCR has received all of the following:
 - A completed Variance Request form.
 - Request must include a specific date by which the licensee will become operational.
 - A completed Variance Request Questionnaire
 - Proof of payment of the \$100.00 processing fee
 - Description of good cause to extend the deadline, which should include:
 - Efforts licensee has taken to become operational in the time frame established by rule
 - The reasons the licensee cannot meet the rule requirement; and
 - A detailed plan for becoming operational by the proposed extended deadline
 - Documentation to support the claims by which the licensee is requesting the variance
 - No variance request is approved unless DCR issues a written approval
 - Variance Request Form - <https://health.mo.gov/safety/cannabis/facilities-variance-request-form.php>

Required Notifications

19 CSR 100-1.100(6)

- Licensees have a continuing duty to provide the department with up-to-date contact information, including the individual who shall be the designated contact for all department communications.”
- “Licensees shall notify the department in writing of any changes to the mailing addresses, phone numbers, email addresses and other contact information they provide the department.
- Licensees must report, **at least annually**:
 - For marijuana facility licensees, all owners, with ownership percentage; and
 - For medical facility licensees, all entities that own any part of the licensed entity, with ownership percentage.
- Licensees shall notify the department **within five (5) days** of the initiation and conclusion of any legal proceedings, government investigations or any other activity that would impair the licensee’s ability to operate in accordance with department regulations or the department’s review of an application, including a petition for receivership, loss of lease or location, or disputes relating to the ownership or control of the facility or license.
- Licensees shall notify the department of any entity name changes or fictitious name changes.

Licensed Facilities Listings

<https://health.mo.gov/safety/cannabis/licensed-facilities.php>

Licensed Facilities

DHSS Home » Licensing & Regulations » cannabis » licensed-facilities

Cultivation Facility

- MO Licensed Cultivation Facilities List  (Updated 2-16-2024)

Dispensary Facility

- MO Licensed Dispensary Facilities List  (Updated 3-11-2024)

Infused Product Manufacturing Facility

- MO Licensed IPM Facilities List  (Updated 3-13-2024)

Laboratory Testing Facility

- MO Licensed MM Laboratory Testing Facilities List  (Updated 2-16-2024)

Microbusiness Dispensary Facilities

- MO Licensed Microbusiness Dispensary Facilities List  (Updated 3-11-2024)

Microbusiness Wholesale Facilities

- MO Licensed Microbusiness Wholesale Facilities List  (Updated 2-16-2024)

Seed to Sale

For a List of MO Certified Seed to Sale Providers visit: <https://www.metro.com/missouri> or email CannabisLicense@health.mo.gov to verify your selected point of service provider is certified and valid.

Transportation Facility

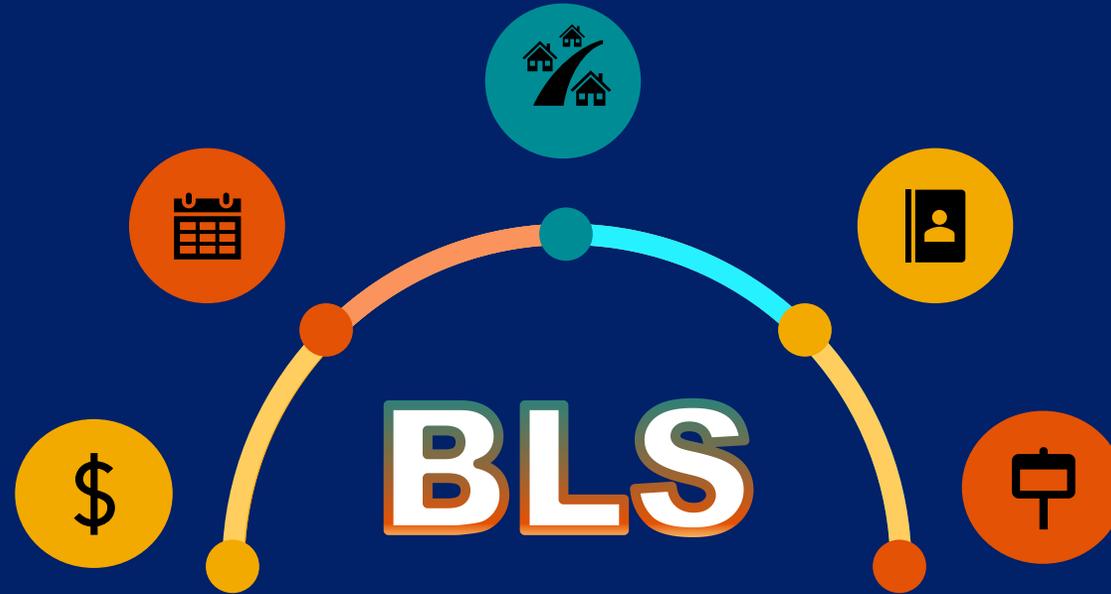
- MO Licensed MM Transportation Facilities List  (Updated 2-15-2024)

Approved to Operate	License Number	Entity Name	City	State	Postal Code	Contact Information 1	Contact Information 2	Contact Phone
	MBD000001	Frankenstein Enemy, LLC	COLUMBIA	MO	65202	Amanda	Kilroe	947-955-6146
	MBD000002	Potluck THC LLC	Kansas City	MO	64111	Sara	Gullickson	602-290-9424
	MBD000003	Zac Hall LLC	JOPLIN	MO	64801	Zac	Hall	417-233-5705
	MBD000004	FLY-HI LLC	WENTZVILLE	MO	63385	David	Tucker	314-307-8812
	MBD000005	The Joke Smoke SE LLC	EUREKA	MO	63025	Sara	Gullickson	602-290-9424
	MBD000006	The Herbal Home LLC	GLADSTONE	MO	64118	Maxime	Kot	602-290-9424
	MBD000007	Individual	ELSBERRY	MO	63343	John	Payne	573-718-3073
	MBD000008	816 DISPENSARY LLC	Platte City	MO	64079	James	Poe	816-500-0939
	MBD000009	Independence Dispensary LLC	INDEPENDENCE	MO	64055	Shavon	Sullivan Wright	310-699-1469
	MBD000010	HIGH AROMA LLC	SPRINGFIELD	MO	65804	Maxime	Kot	602-290-9424
	MBD000011	Sebhatu LLC	POPLAR BLUFF	MO	63901	Rishan	Sbhatu	706-908-9074
	MBD000012	Seashore Rhythm, LLC	ARNOLD	MO	63010	Amanda	Kilroe	947-955-6146
	MBD000013	Ever Eco LLC	SAINT LOUIS	MO	63147	Maxime	Kot	602-290-9424
	MBD000014	Cannarooted LLC	COLUMBIA	MO	65202	Sara	Gullickson	602-290-9424
	MBD000015	Green4Cure LLC	CPE GIRARDEAU	MO	63703	Rina	Patel-Jerls	405-343-0490
	MBD000016	N&M&R Enterprise LLC	FLORISSANT	MO	63033	Samuel	Henderson	314-775-9798

IMPORTANT REMINDERS

Licensees must comply at all times with applicable state, local and federal requirements

Licenses are valid for three years



Licensees have a continuing duty to provide the DCR with up-to-date contact information

Annual fees are due on the anniversary of licensure

Notify DCR of entity or fictitious name changes

<https://health.mo.gov/safety/cannabis/fees.php>



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Contact Us



CannabisLicense@health.mo.gov



573.751.6234



Cannabis.Mo.Gov

Restaurants near The Millbottom

Big Whiskey's American Bar and Restaurant 627
W McCarty St, Jefferson City, Mo 65101

Theo's Midtown
620 W McCarty St, Jefferson City, MO 65101

Cinco De Mayo
409 W Miller St, Jefferson, Mo 65101

Arris' Pizza
117 W High St, Jefferson City, MO 65101

Sweet Smoke BBQ – Downtown
127 E High St, Jefferson City, Mo 65101

Madison's
216 Madison St, Jefferson City, MO 65101

Subway
114 E High St, Jefferson City, MO 65101

Izzy's
128 E High St, Jefferson City, MO





MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Division of Cannabis Regulation

**Bureau of Facility
Compliance**

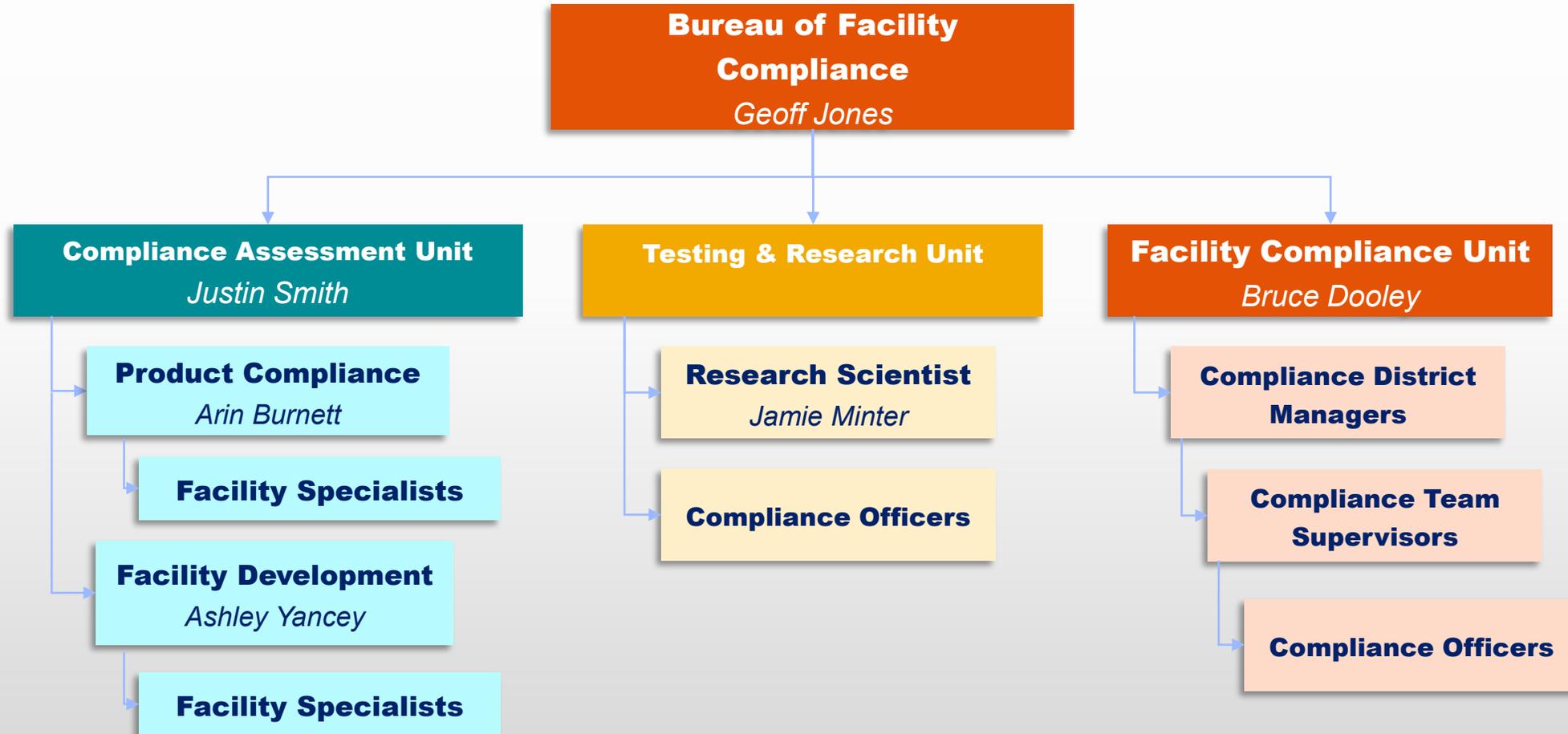
Geoff Jones and Bruce Dooley

Overview

- Bureau Structure
- Commencement Inspection Preparation and Processes
- Facility Security
- Facility Employee Training
- Facility-Specific Permitted Activities
- General Operations
- Inventory Control and Seed-to-Sale Tracking
- Item Approval Process
- Licensee Notification and Reporting
- Marijuana Product Testing
- Marijuana Waste Disposal
- Transportation and Transfer of Marijuana Product

Bureau of Facility Compliance

Bureau Structure



Compliance Assessment Unit

- **Product Compliance Team :**
 - Facility Specialists approve packaging, labeling and product design submissions.
 - All final marijuana product packaging, labeling and product design items must be preapproved by DCR.
- **Facility Development Team:**
 - Facility Specialists process Commencement Inspection requests and ensure all required information is provided and accurate.

Facility Compliance Unit

- The State is divided into 3 regions: Jefferson City, Kansas City and St. Louis.
- **Compliance Officers:**
 - Have designated cultivation, dispensary, manufacturing, transportation and microbusiness dispensary & wholesale licensees.
 - Verify compliance through inspections, compliance monitoring, statewide track and trace reviews, education, violation issuance and resolution.

Testing and Research Unit

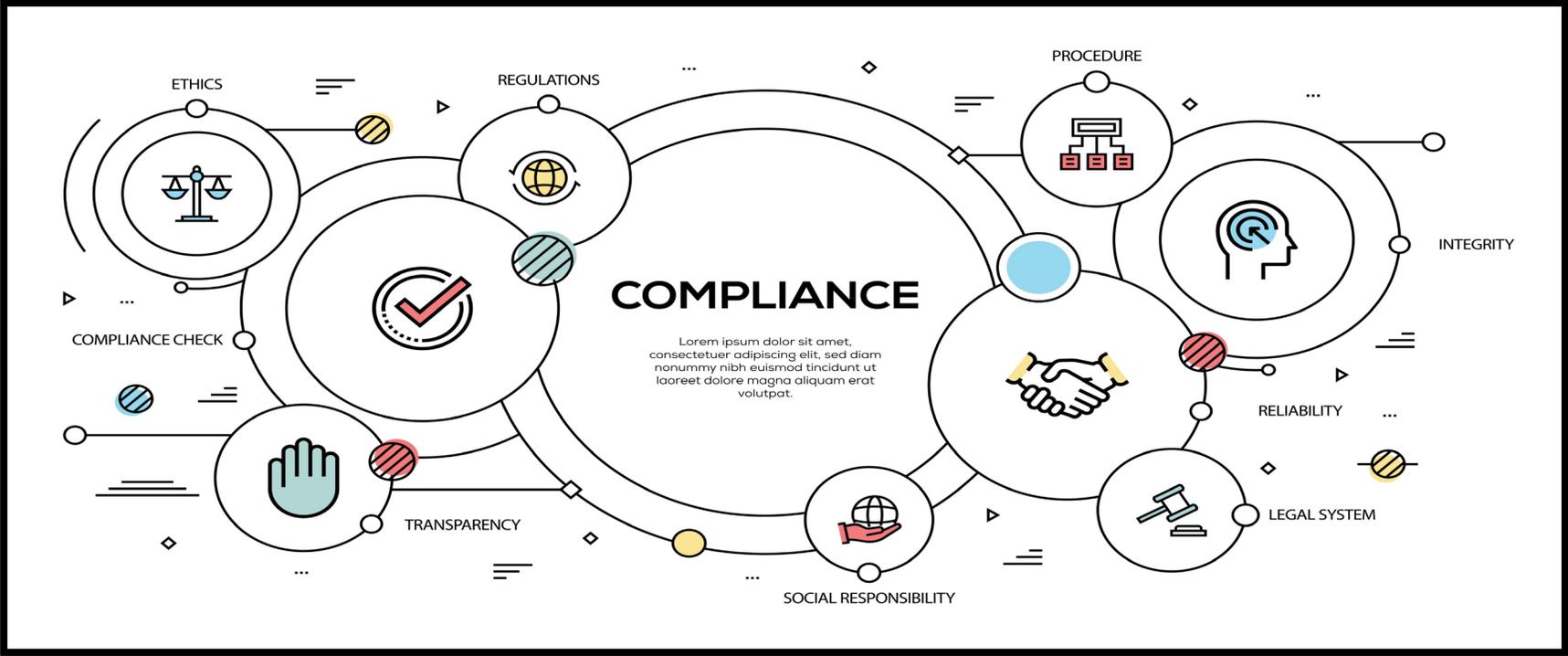
Cannabis Research Scientists:

- Research and engage with licensees and national groups to develop standards for cannabis testing in Missouri
- Which includes best practices, trends and potential health hazards.

Compliance Officers:

- Are specialized in testing, research and laboratory settings.
- Have designated testing licensees.
- Verify compliance through inspections, compliance monitoring, statewide track and trace reviews, education and violation issuance and resolution.

Facility Compliance is here to build a strong working relationship with our licensees, have open lines of communication, to assist licensees and ensure compliance with Article XIV and Department Rules.





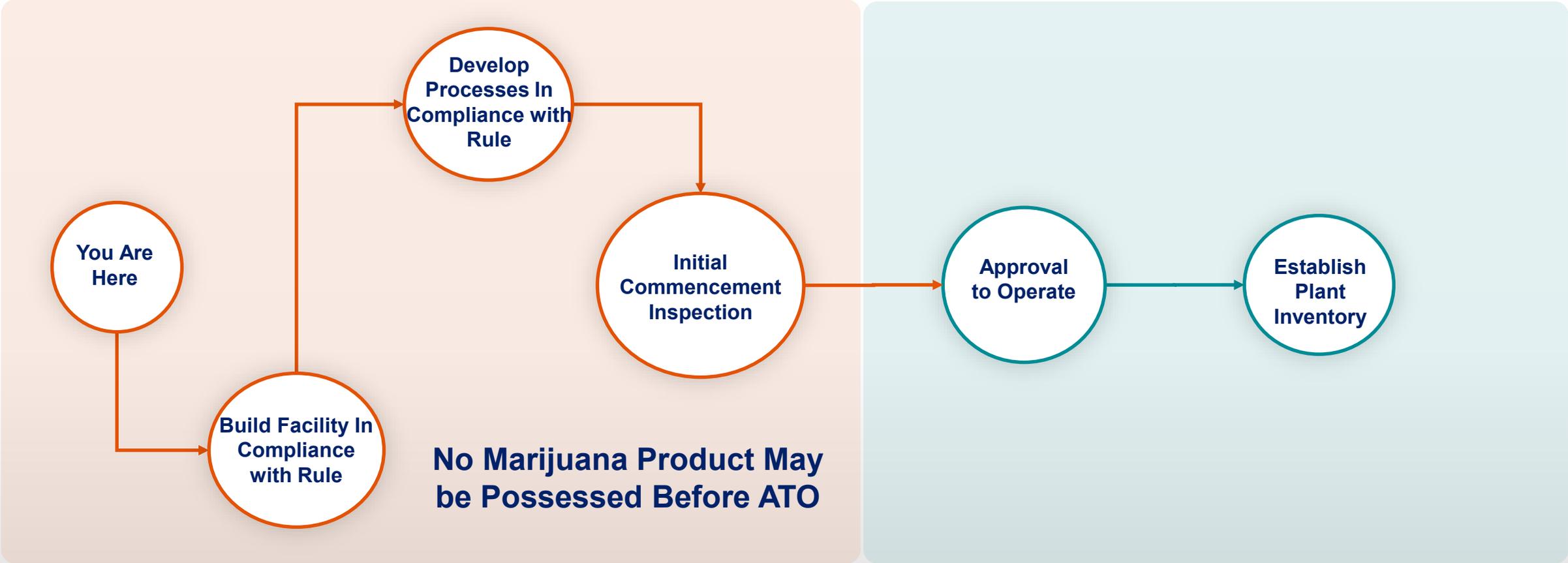
MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Division of Cannabis Regulation

**Commencement Inspection
Preparation and Processes**

19 CSR 100-1.030(3)

Roadmap to Approval to Operate (ATO)



Licensees must maintain compliance with rule as long as they hold a license.

Commencement Inspection Preparation and Processes

- Per **19 CSR 100-1.030(3)(A)**, all licensees must request and pass a commencement inspection before they can begin operations under a new license.
- Furthermore, per **19 CSR 100-1.030(3)(D)**, “licensees may not commence any operations that are subject to a commencement inspection, including opening the business, until DCR issues written approval to so.”
- **Within 30 Days** of when a Licensee believes it is ready to begin operations at the facility, they will notify DCR and submit a request that **must** include the following:
 - **19 CSR 100-1.030(3)(A)1.A** – Provide blueprints of the facility labeling the intended use of all spaces and how those spaces comply with the physical security requirements applicable to that license.
 - Provide room names, such as Flower Rm #1, Flower Rm #2 and label all the security equipment, such as camera locations, panic alarms, access controls, etc.

Commencement Inspection should be done before:

- Beginning operations under a new license or certification;
- Occupying or utilizing new space for which the licensee has not previously received approval to operate, including vehicles;
- Sharing space with another licensee;
- Changing the use of spaces;
- Or, in the case of microbusiness wholesale facilities, begin cultivating or manufacturing where that activity was not already approved after inspection.

Commencement Inspection Preparation and Processes (Continued)

- **19 CSR 100-1.030(3)(A)1.B** – Provide all standard operating procedures (SOPs) necessary for the Licensee to conduct operations in compliance with regulations for that license.
 - Examples of document topic areas include, but are not limited to the following:
 - Waste Management
 - Employee Health and Sanitation
 - Environmental Factors
 - Cleaning and Sanitizing Rooms and Equipment
 - Equipment Operations and Control
 - Odor Control
 - Inventory Control
 - Recall/Destruction
 - Security
 - Health Insurance Portability and Accountability Act (HIPAA)
 - Emergency
 - Cease Operations
 - Logs Related to Certain SOPs

Note: SOP's are not reviewed for compliance with Article XIV and department rule but rather to demonstrate operational preparedness.

Commencement Inspection Preparation and Processes (Continued)

- **19 CSR 100-1.030(3)(A)1.C** – Provide records documenting the completion of all required training regarding compliant operation of the state-wide track and trace system.
 - **Metrc** (Marijuana Enforcement, Tracking, Reporting and Compliance) is the State's track and trace system and official inventory record.
 - Metrc support can be contacted at support@metrc.com or 877-566-6506 with any Metrc questions or assistance on training signup and/or credentialing.

Commencement Inspection Preparation and Processes (Continued)

- **19 CSR 100-1.030(3)(A)1.D** – Provide “documentation showing compliance with all applicable federal, state and local requirements for the facility.”
 - **These documents and/or permits may include, if applicable, but are not limited to:**
 - Zoning permits
 - Building permits and code inspections
 - Certificate of Occupancy
 - Fire Safety Inspection
 - Business License
 - Wastewater permits
 - Solid Waste permits
 - Food Safety Inspection
 - National Type Evaluation Program (NTEP) Approved Scale
 - Any other permits or license required by local or Missouri jurisdiction



Commencement Inspection Preparation and Processes (Continued)

- As a reminder, per **19 CSR 100-1.100(4)(E)**, Microbusiness licensees must receive approval to operate **within two (2) years** of being issued a license unless a variance has been granted.
- To request a Commencement Inspection, send the request, along with other required information, to cannabiscompliance@health.mo.gov and licensee's assigned Compliance Officer. DCR will confirm the request and next steps in the Commencement Inspection will proceed.
- During initial document review, if licensee did not provide required information or fails to provide additional information, then request could be considered incomplete and request may be set aside, per **19 CSR 100-1.030(3)(B)**, with licensee having to submit a new request when ready to proceed.

Commencement Inspection Preparation and Processes (Continued)

- After document review process is complete, the licensee's compliance officer will make arrangements to complete an in-person physical inspection of the facility, which will include photographs taken of facility for internal review purposes only.
- After physical inspection, the Compliance Officer will work with licensee to correct any outstanding compliance issues.
- DCR will complete a review related to the commencement inspection and a written approval will be provided to the Licensee. Licensees are not authorized to commence operations until written approval is provided to the designated contact.
- However, per **19 CSR 100-1.030(3)(B)**, if outstanding issues cannot be corrected following the physical inspection, then request could be considered that licensee was not prepared to complete the commencement inspection process and may be set aside, with licensee having to submit a new request when ready to proceed.

Establishing Plant Inventory

- Microbusiness wholesale licensees with approval to cultivate have one (1) year from the approval date to establish the license's marijuana plant inventory. The licensee has the ability to record marijuana plants in Metrc that do not originate from marijuana plants previously within Metrc.
- After that first year, DCR will disable that option within Metrc and the licensee will be required to maintain marijuana plant inventory through marijuana plants within their facility, by obtaining seeds or clones from other cultivation licensees, or seeds from third-party sources.
- Plants are considered Immature, Vegetative or Flowering.
- All initial inventory has to be entered into Metrc through immature plant batches.



Establishing Plant Inventory (Continued)

- Per **19 CSR 100-1.130(1)(E)1**, all immature plants at least eight (8) inches tall or eight (8) inches wide shall be tagged with traceability information that consist of plants tags from Metrc.
- Per **19 CSR 100-1.130(1)(F)**, all marijuana seeds and plants are required to be recorded into Metrc **on the day that the seeds or plants are within the facility** as the inventory in Metrc is to reflect the physical inventory at the end of the day.
- Metrc tags can only be used **one time** for a plant and should not be reused, with that Metrc tag being disposed of after use.



Establishing Plant Inventory

(Continued)

- All immature plants, vegetative plants and flowering plants must be tagged with Metrc tags for traceability information.
- Per **19 CSR 100-1.130(1)(E)**, all marijuana product in a facility must be traceable in Metrc at all times. This includes **all** plants, seeds, clones and created packages.
- Any received packages from another license must be tagged with Metrc tags for traceability information.
- Additional information on how to enter plant inventory into Metrc can be provided by Metrc Support at support@metrc.com or 877-566-6506.



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Facility Security

19 CSR 100-1.090

Division of Cannabis Regulation

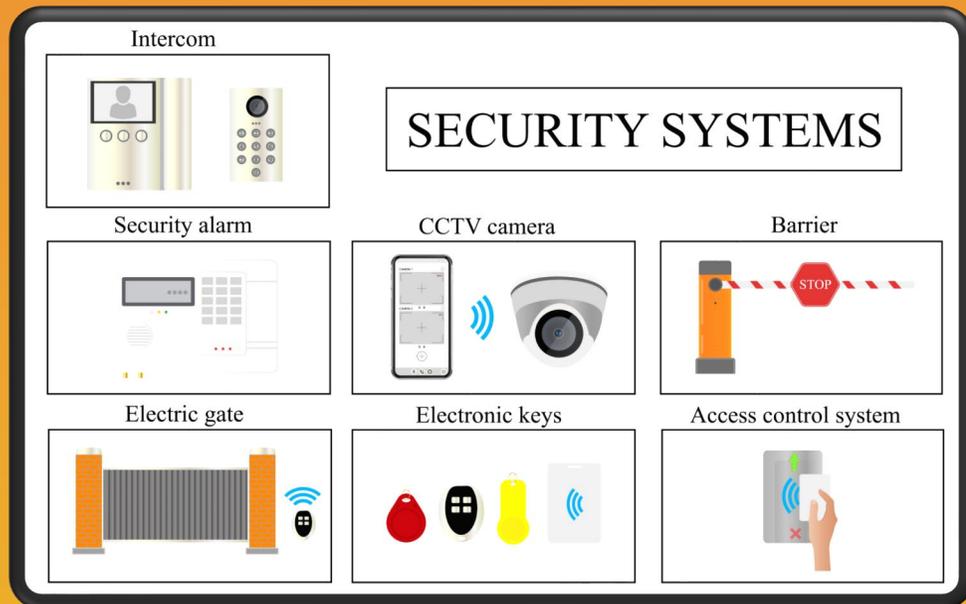
Facility Security

19 CSR 100-1.090

“All medical and marijuana facility licensees shall ensure the security of marijuana product and the facility, including any offsite warehouses, by taking security measures and maintaining security equipment” as outlined in this section of rule.

Licensee Implementation of Security Measures

19 CSR 100-1.090



“Devices or a series of devices to detect unauthorized intrusion.”

“Except in the case of outdoor cultivation, exterior lighting to facilitate surveillance, which shall cover the exterior of all buildings and perimeter of the facility.”

“Controlled entry to limited access areas, which shall be controlled by electronic card access systems, biometric identification systems or other equivalent means.”

“A method of immediate, automatic notification to alert local law enforcement agencies of an unauthorized breach of security at the facility.”



Implementation of Security Measures

19 CSR 100-1.090
(Continued)



“Manual, silent alarms affixed at each point of sale, reception area, vault, warehouse and electronic monitoring station with capability of alerting local law enforcement immediately of an unauthorized breach of security at the facility.”



“Security film or shatter-proof glass on glass doors and storefronts.”



“If windows are in limited access areas, the windows cannot be opened and must be designed to prevent intrusion, or the window is otherwise inaccessible from the outside.”



“Vaults must be secured in a manner that prevents access to unauthorized individuals through both physical and electronic security measures.”

Electronic Video Monitoring

19 CSR 100-1.090



The use of motion detection as a method of continuous monitoring is **NOT** permitted where marijuana product is or will be present.

“Electronic video monitoring, which shall include video cameras with a recording resolution of at least 1920 x 1080p or, the equivalent, capable of recording videos at a rate of at least fifteen (15) frames per second, that operate in such a way as to provide continuous monitoring and allow identification of people and activities in all lighting levels,” and that are capable of being accessed remotely at all times by the department or a law enforcement agency in real time.

19 CSR 100-1.090(1)(C)4

“All activities subject to video camera monitoring shall occur only in areas of the facility that are covered by the required video monitoring.”



Video Cameras Must Provide Coverage Of:

“All facility entry and exit points, including windows.”

“All vaults or safes where marijuana product is stored.”

“All areas of the facility and facility premises where marijuana is or will be present”

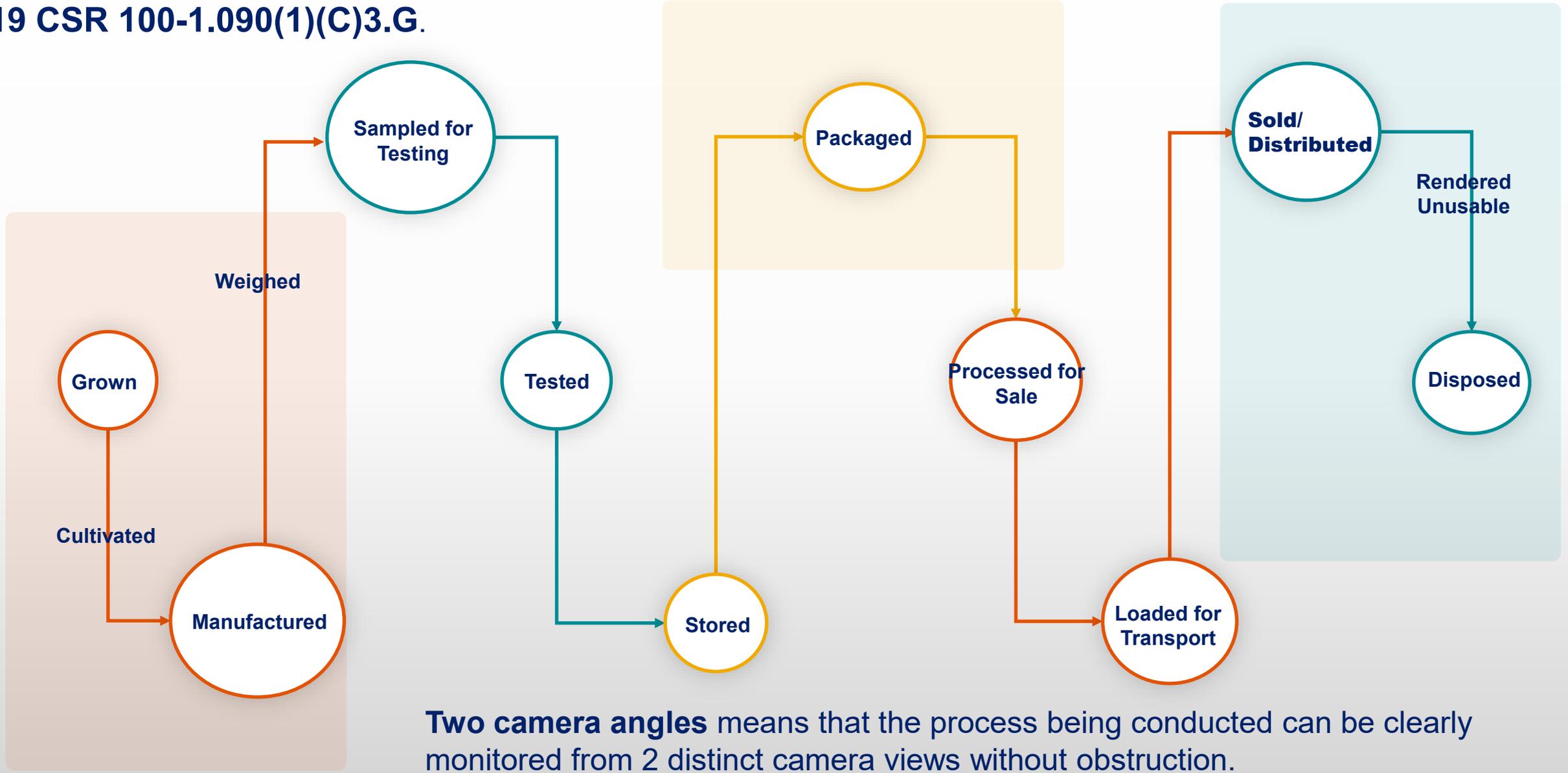
“Any area on facility premises including off site warehouses where a seed-to-sale system or state-wide track and track system are accessed.”

“Each point-of-sale location”

“The entire perimeter of the facility, including at least twenty feet (20') of space around the perimeter of an outdoor grow area.”

Where Two Camera Angles are Required

19 CSR 100-1.090(1)(C)3.G.



Two camera angles means that the process being conducted can be clearly monitored from 2 distinct camera views without obstruction.

“Licensees shall ensure that each video camera used pursuant to this section-”

“Includes a date and time generator which accurately displays the date and time of recorded events on the recording in a manner that does not significantly obstruct the recorded view.”

“Is installed in a manner that prevents the video camera from being readily obstructed, tampered with or disabled.”

“Is cabled and does not solely operate via wifi.”

Electronic Monitoring Requirements

19 CSR 100-1.090

- “One (1) call-up monitor that is at least nineteen inches (19”).”
- “Printer capable of immediately producing a clear, color, still photo from any video image.”
- Ability to “store video recordings for sixty (60) days in a secure location/service that allows providing copies of recordings to Department upon request, at licensee expense.”
- “Video storage must be encrypted.”
- “A failure notification system that provides an audible and visible notification of any failure in the electronic monitoring system.”
- “Sufficient back up battery for video cameras and recording equipment for at least sixty (60) minutes of recording in event of a power outage.”

“Licensees shall establish and follow policies and procedures for-”

Restricting access to areas of facility that contain marijuana to only those with legitimate business purposes. Agents must have an ID card, visitors must be escorted by facility agent. (5 visitors to 1 agent)

“Identifying facility agents responsible for inventory control activities.”

“For the use of automatic or electronic notification and manual, silent alarms to alert local law enforcement of security breach at the facility including designation of on call personnel to respond to alarms.”

“Identifying persons authorized to be in the areas of the facility that contain marijuana product.”

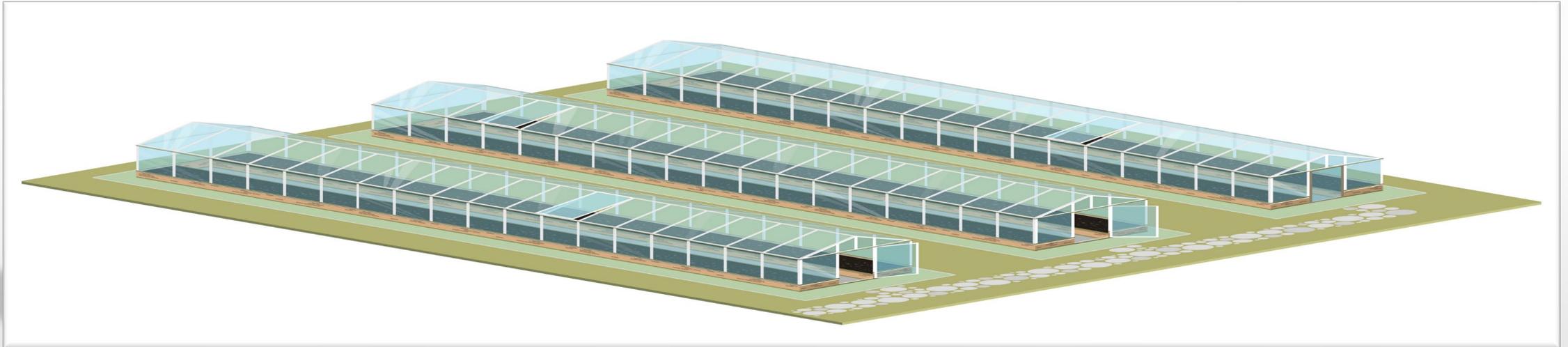
“For monitoring the security for the facility”

“For keeping local law enforcement and the department updated on whether the facility employs armed security personnel and how those personnel can be identified on site.”

Licenseses with “outdoor or greenhouse cultivation spaces, or cultivation or manufacturing facilities with multiple buildings in which cultivation or manufacturing are conducted, shall construct an exterior barrier around the perimeter of the facility that consists of a fence-”

“That is at least eight (8) feet in height from the ground to top of the fence.”

“Screened such that the outdoor cultivation area is not easily viewed outside the fence.”

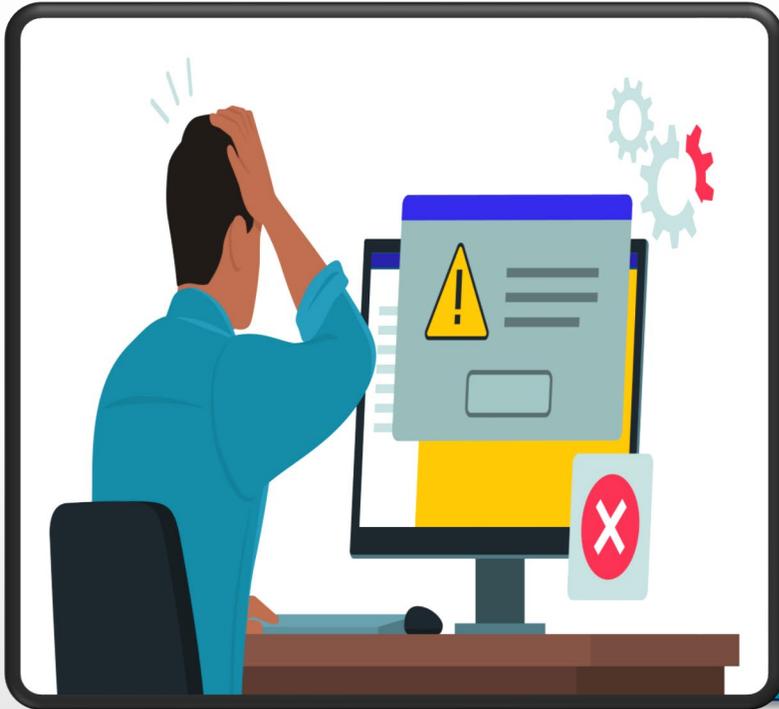


“Constructed of nine (9) gauge metal or stronger chain link.”

“Topped with razor wire or similar security wire along the entire length of the fence.”

“That includes a secured gate that complies with the same standards as the fences as well as a method for controlling access through the gate.”

Security Malfunction



“A malfunction occurs when any piece of security equipment fails to work as designed or intended for more than sixty (60) seconds through defect, power outage, security breach, internet outage, compromise or other reason.”

Security Measures

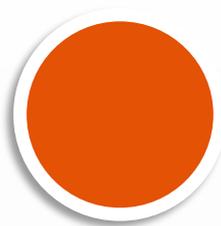
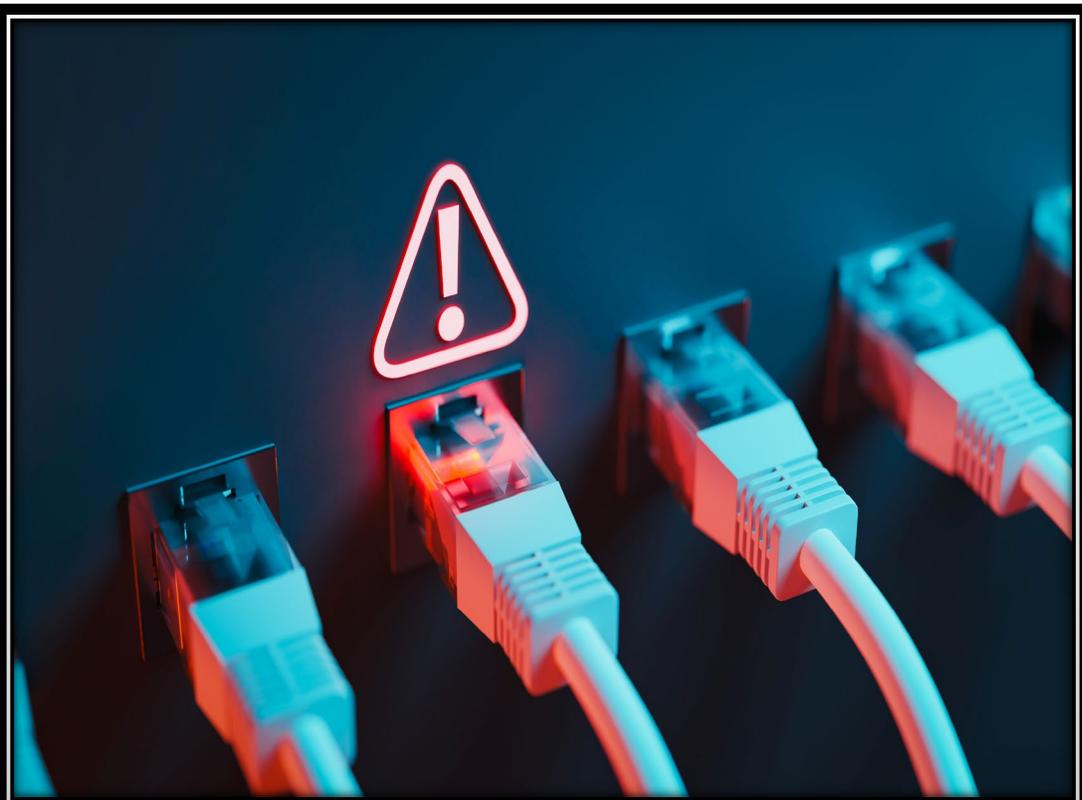


19 CSR 100-1.090(5)(B)

“If electronic video monitoring pursuant to this section malfunctions, the licensee shall **immediately** provide video camera coverage or use other security measures until video camera coverage can be restored, such as assigning additional supervisor or security personnel, to provide for the security of the facility. If the licensee uses other security measures, the licensee must **immediately** notify the department.”

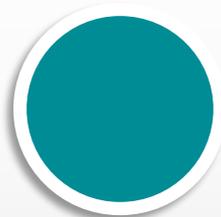
19 CSR 100-1.090

Licensee's Responsibility



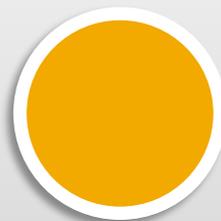
Planned Outages:

“Shall notify the department **at least twenty-four (24) hours** prior to the planned outage and provide a plan for the facility and product security during the outage.”



Malfunctions:

“Shall notify the department **within twenty-four (24) hours** after malfunction is discovered and shall make a reasonable effort to repair **within seventy-two (72) hours.**”



Notifications To:

CannabisCompliance@health.mo.gov

And your assigned compliance officer.

Security Malfunction Log

“Each licensee shall maintain a log that documents each malfunction and repair of security equipment of the facility. The log must state at minimum-”

“The date the malfunction is repaired.”

“Alternative security measures taken” if applicable.

“The reason for any delay in repairing the malfunction.”

“Date and time of all communications with the department concerning the malfunction.”

“Efforts taken to repair the malfunction including the date of each effort.”

The corrective action to the malfunction.

“Date, time and nature of each malfunction.”

Logs must be maintained “for at least 1 year after the date of last entry.”



Each Licensee Shall Employ a Security Manager

The security manager position has specific responsibilities outlined in rule and requires specific training requirements that will be covered in employee training section.

Security Manager Responsibilities

19 CSR 100-1.090(6)(A-D)

A

“Semi-annual audit of all security measures.”

B

“Training employees on security measures, emergency response, theft prevention and response within one (1) week of hiring and on an annual basis.”

C

“Evaluating the credentials of any contractors or other individuals who intend to provide services to the facility before the contractor or individual is hired by or enters into a contract with the licensee.”

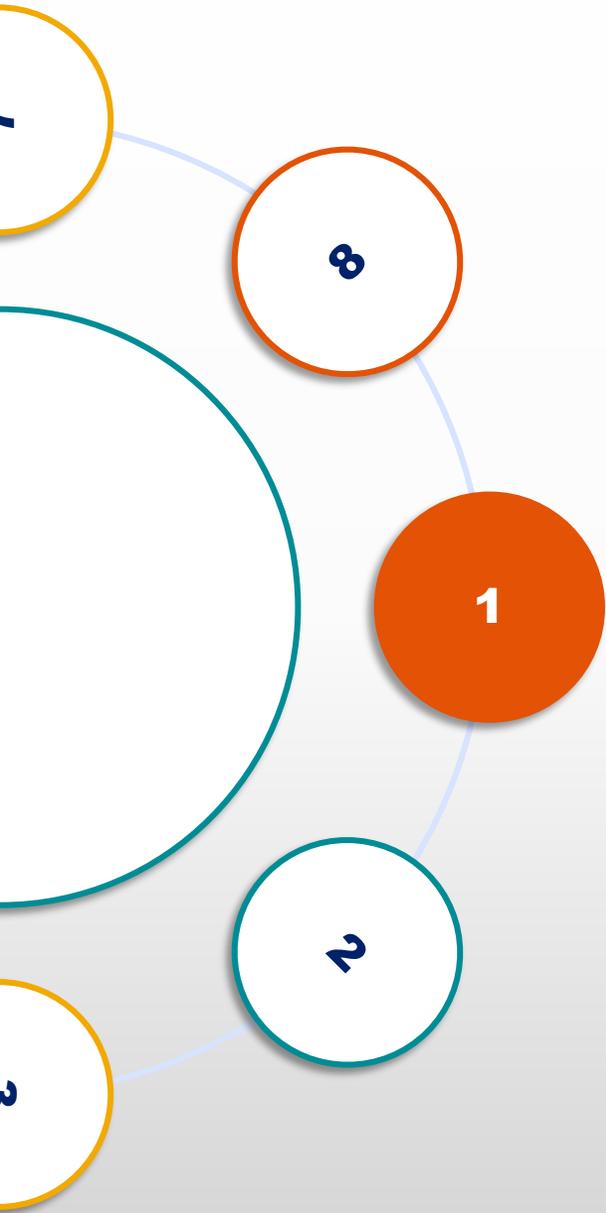
D

“Evaluating the credentials of any third party who intends to provide security to the facility before the third party is hired by or enters into the contract with the facility.”

Licensee's Responsibility

- Licensee must ensure that all facility employees, contractors and volunteers receive training to perform tasks in compliance with Article XIV and department rule.
- Training records must be maintained for at least 5 years.
- All training shall be completed no later than one (1) week after an employee begins work at a facility.
- Licensees must make all training records available for review during inspections.

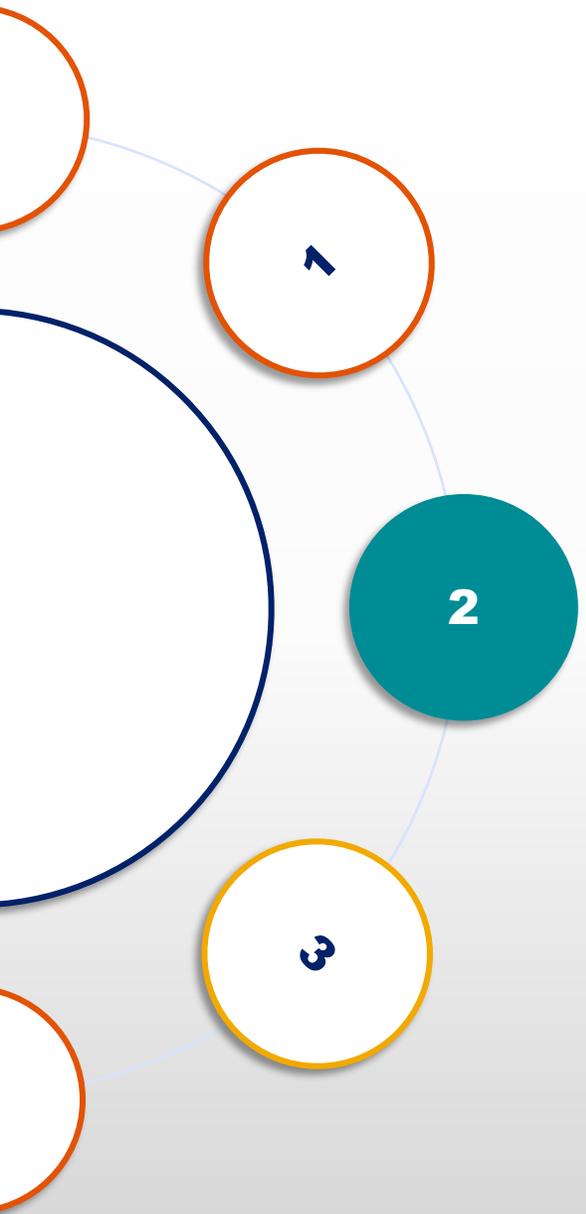




All License Types

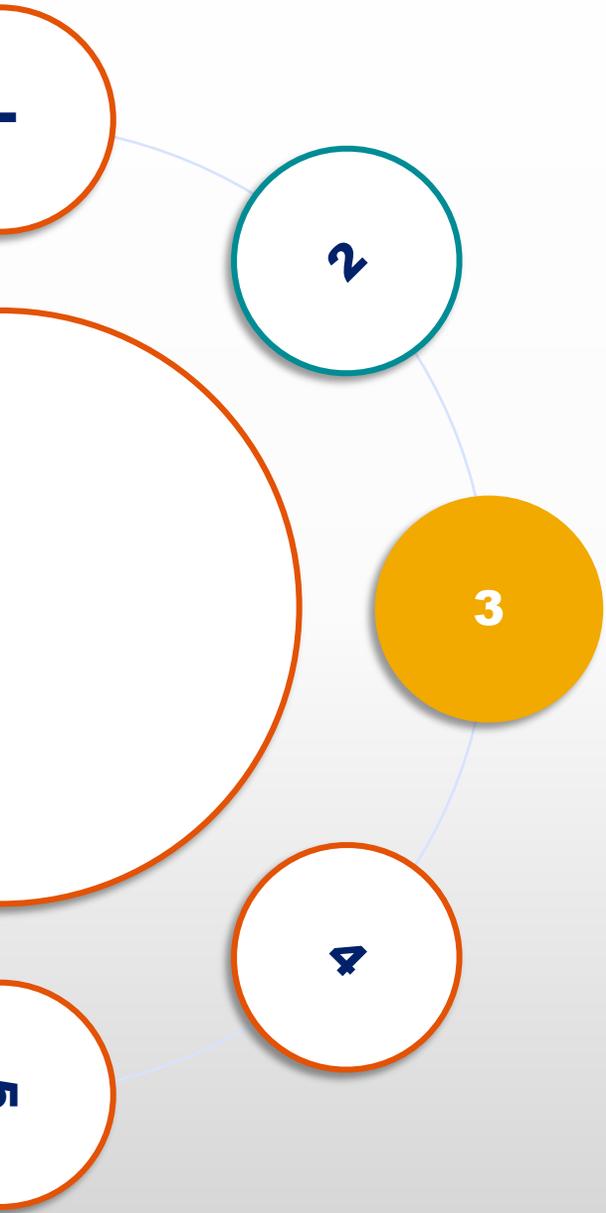
Within one week of hire and on an annual basis will receive training from the Security Manager on:

- “The use of security measures and controls that have been adopted by the licensee for the prevention or diversion, inversion, theft or loss of marijuana product, as applicable to the employee’s duties.”
- “Procedures for responding to an emergency, including severe weather, fire, natural disasters and unauthorized intrusions.”



All License Types

“All facility staff should receive training regarding the safety and sanitation procedures of the facility as applicable to the employee’s duties.”



All License Types

All facility staff should be trained on processes and procedures used by the facility are applicable to that employee's duties.

If there is an update or modified SOP, training should occur no later than one week after that modification.

All License Types

All facility staff should receive training on the proper use of the state-wide track and trace system, as applicable to the employee's duties is required.

support@metrc.com
1-877-566-6506

Sign up for [Metrc bridge](#) training and become a Metrc guru!

Visit [Metrc Youtube](#) for quick informational videos on relevant topics.

All facility staff shall receive training on the Department's rules and guidance as applicable to the employee's duties.

The screenshot shows the Missouri Department of Health & Senior Services website for Cannabis Regulation. The header includes the department logo, navigation links for MO.gov, Governor Parson, Find an Agency, and Online Services, along with a search bar and social media icons. The main navigation menu lists Healthy Living, Senior & Disability Services, Licensing & Regulations, Disaster & Emergency Planning, and Data & Statistics. The Cannabis Regulation section features a grid of tiles for Facility Licensing and Compliance, Patient Services, Physician Information, Data and Reports, Feedback, FAQs, Complaint Forms, Facility Communications and Guidance, and Microbusinesses. A right-hand sidebar contains a list of links such as Agent ID Information, Facility Information, Ballot to Implementation: A Program's Journey, Microbusiness Information, News Releases, Patient Information, Physician/Nurse Practitioner Information, Cultivation - Patient/Caregiver & Consumer, Resources, Data and Reports, About Us, Rules and Law, Join our Email List, and Feedback. At the bottom of the sidebar is contact information for the Division of Cannabis Regulation, including the address and phone number.



RULES OF
**Department of Health and Senior
Services**
Division 100—Division of Cannabis Regulation
Chapter 1—Marijuana

Verifying age and purchase limits of consumers, qualifying patients and primary caregivers.

“Expected timeframes for individuals to feel the effects of marijuana product based on their chosen method of use;”



“Differences in the purported effects and effectiveness of strains of marijuana available for purchase at their dispensary and the methods of use;”

Maintaining confidentiality of information related to consumers, qualifying patients and primary caregivers use of marijuana product.

Transportation Facility Employees



Transportation facility employees shall receive training on “maintaining the confidentiality of information related to the use of marijuana product and in procedures for verifying the age and identity of consumers, qualifying patients and primary caregivers.”

19 CSR 100-1.080(1)(G)

Security Staff Training

The Security Manager and facility agents who provide security or third-party security must have completed trainings including the following subjects:

Protection of Crime Scene

Appropriate Use of Force or related subject

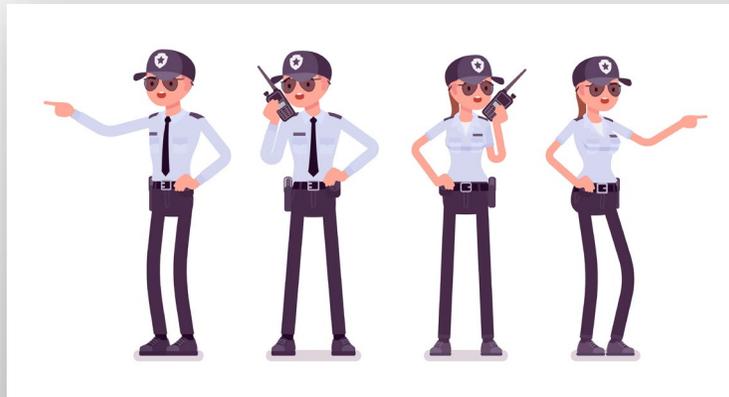
Control of Access to Protected Areas of Facility or related subject

Emergency Response or related subject

*** Not fewer than eight (8) hours of training at the facility providing security services**

Theft Prevention or related subject

*** Not fewer than eight (8) hours of classroom training in providing security services**





MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Facility-Specific Permitted Activities

19 CSR 100-1

Division of Cannabis Regulation

Permitted Activities

- Each facility type has individual activities that are deemed permissible for its specific facility type.
- The following slides will walk through each these facility types and the permitted activities for that facility type, as outlined in 19 CSR 100-1.

- ❖ Microbusiness Dispensary
- ❖ Microbusiness Wholesale: Cultivation and Manufacturing
- ❖ Transportation and Storage

Microbusinesses

19 CSR 100-1.190

“Microbusiness facility means a microbusiness dispensary facility or a microbusiness wholesale facility.”

“Entities must obtain a license to cultivate, manufacture and dispense marijuana product in Missouri as a marijuana microbusiness.”

Microbusiness Dispensary Licensees

- “Licensed to engage in the process of dispensing marijuana product for medical or adult use, in compliance with the dispensary facility rule in this chapter.”
- “Shall only acquire marijuana product from a microbusiness wholesale facility or another microbusiness dispensary facility.”

Microbusiness Wholesale Licensees

- “Licensed to engage in the process of cultivating and manufacturing marijuana product for medical or adult use, in compliance with the cultivation facility and manufacturing facility rules in this chapter.”
- “May only transfer its products to a testing facility, transportation facility, microbusiness dispensary facility or to another microbusiness wholesale facility.”

Notes

- “Both Microbusiness facility types may choose to do all or only a subset of the activities authorized under its license.”

Cultivation Facilities

19 CSR 100-1.160

***Note:** *Cultivation facility means a medical marijuana cultivation facility, a comprehensive marijuana cultivation facility, or a microbusiness wholesale facility licensed to cultivate marijuana.*

A cultivation licensee's authority to engage in the process of cultivating marijuana includes the ability to :

"Cultivate marijuana;"

"Process, package, and store (on- or off-site) marijuana product."
(A cultivation licensee's authority to process marijuana shall include the production and sale of prerolls but shall not include the manufacture of marijuana-infused products.)

"Acquire and transfer marijuana product from a manufacturing facility or dispensary facility;"

"Transfer marijuana product to or from its own warehouse storage facility, another cultivation facility, manufacturing facility or dispensary facility;"

"Acquire and transfer marijuana seeds from entities not licensed under this chapter if doing so does not violate state or federal law;"

"Transfer marijuana product to a testing facility;"

"Acquire and transfer marijuana, marijuana seeds, and clones from another cultivation facility;"

"Sell marijuana product to another cultivation facility, manufacturing facility, dispensary facility or testing facility."



Manufacturing Facilities

19 CSR 100-1.170

***Note:** “Manufacturing facility” means a medical marijuana infused products manufacturing facility, a comprehensive marijuana-infused products manufacturing facility, or a microbusiness wholesale facility licensed to manufacture marijuana.

A manufacturing licensee’s authority to engage in the process of manufacturing marijuana-infused products includes the ability to :

Process and store (on- or off-site) marijuana product. (A manufacturing licensee’s authority to manufacture marijuana-infused products shall include the creation of prerolls and infused prerolls)

“Manufacture and package marijuana-infused products and prerolls;”

“Acquire and transfer marijuana product from a dispensary facility;”

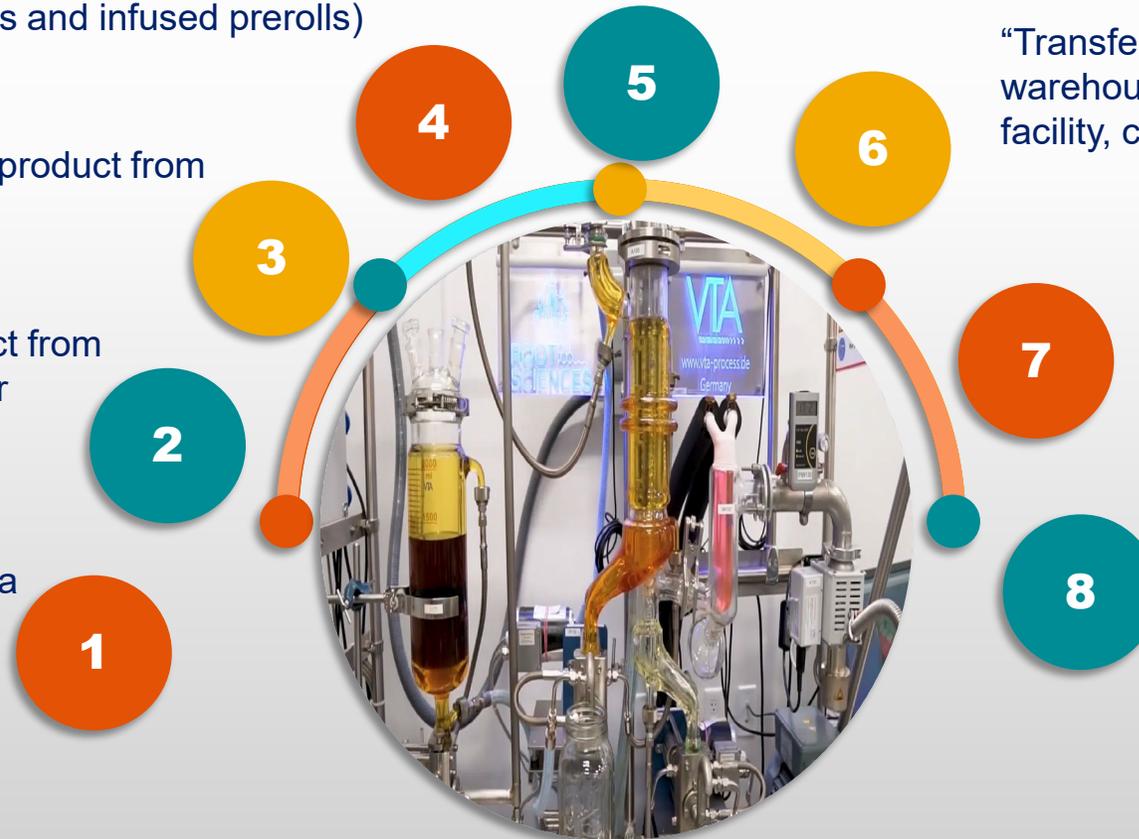
“Transfer marijuana product to or from its own warehouse storage facility, another manufacturing facility, cultivation facility or dispensary facility.”

“Acquire and transfer marijuana product from another manufacturing facility to further process;”

“Transfer marijuana product to a testing facility;”

“Acquire and transfer marijuana from a cultivation facility;”

“Sell marijuana product to another manufacturing facility, cultivation facility, dispensary facility or testing facility.”



Dispensary Facilities

19 CSR 100-1.180

***Note:** “Dispensary facility” means a medical marijuana dispensary facility, a comprehensive marijuana dispensary facility, or a microbusiness dispensary facility

A dispensary licensee’s authority to engage in the process of dispensing marijuana product includes the ability to :

“Create and sell prerolls, which does not include the grinding of marijuana for use in prerolls or manufacture of marijuana-infused products;”

“Package and store (on- or off-site) marijuana product and drug paraphernalia used to administer marijuana product;”

“Acquire and transfer marijuana product from another dispensary facility;”

“Acquire and transfer marijuana-infused products and prerolls from a manufacturing facility;”

“Acquire and transfer marijuana, marijuana seeds, clones and prerolls from a cultivation facility;”

“Transport and sell or distribute marijuana product and drug paraphernalia to another dispensary facility, manufacturing facility, cultivation facility, testing facility or individuals authorized to purchase marijuana product for personal or medical use.”

Note: *A medical dispensary licensee may only sell or distribute to qualifying patients or primary caregivers and a comprehensive or microbusiness dispensary licensee may sell or distribute consumers, qualifying patients or primary caregivers*

“Transfer marijuana product to or from its own warehouse.”



Transportation and Storage

19 CSR 100-1.140

Transfer of Marijuana Product

“A medical or marijuana licensee shall be allowed to transfer marijuana product between facilities, in compliance with the requirements and prohibitions provided in” 19 CSR 100-1.140

“Testing licensees may only transport marijuana product that they intend to test.”

“A dispensary licensee or a transportation licensee shall be allowed to deliver marijuana product to consumers, qualifying patients and primary caregivers”

Warehouse storage

“Licensees shall be allowed to store marijuana product in compliance with the requirements and prohibitions provided in” 19 CSR 100-1.140(6)

“Transportation facility certificate holders may only store marijuana product for purposes related to the transportation of marijuana product.”

“Licensees shall store all marijuana product at designated location(s) within the facility where the licensee is approved to operate; or in warehouses that have been approved by the department in writing”

Microbusinesses

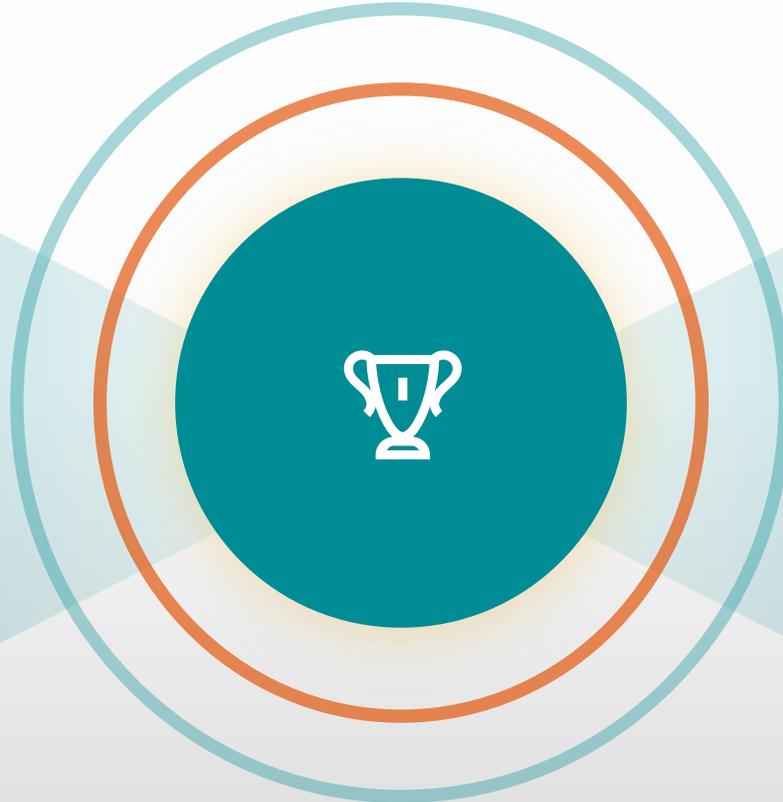
19 CSR 100-1.190

“Microbusiness facility means a microbusiness dispensary facility or a microbusiness wholesale facility.”

“Entities must obtain a license to cultivate, manufacture and dispense marijuana product in Missouri as a marijuana microbusiness.”

Microbusiness Dispensary License

- “Licensed to engage in the process of dispensing marijuana product for medical or adult use, in compliance with the dispensary facility rule in this chapter.”
- “Shall only acquire marijuana product from a microbusiness wholesale facility or another microbusiness dispensary facility.”



Microbusiness Wholesale License

- “Licensed to engage in the process of cultivating and manufacturing marijuana product for medical or adult use, in compliance with the cultivation facility and manufacturing facility rules in this chapter.”
- “May only transfer its products to a testing facility, transportation facility, microbusiness dispensary facility or to another microbusiness wholesale facility.”

Note: “Both Microbusiness facility types may choose to do all or only a subset of the activities authorized under its license.”



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

General Operations

Facilities Generally 19 CSR 100-1.100

Division of Cannabis Regulation

General Operations



- “Licenses shall be displayed within twenty feet (20’) of the main entrance to a facility at all times.”

- “All licensees must comply at all times with applicable state, local and federal requirements.”

- “Medical or marijuana facilities may not allow cultivation, manufacturing, sale, or display of marijuana product or marijuana accessories to be visible from a public place outside of the facility without the use of binoculars, aircraft or other optical aids.”



“Only licensees may hold rights to marijuana product within licensed facilities.”

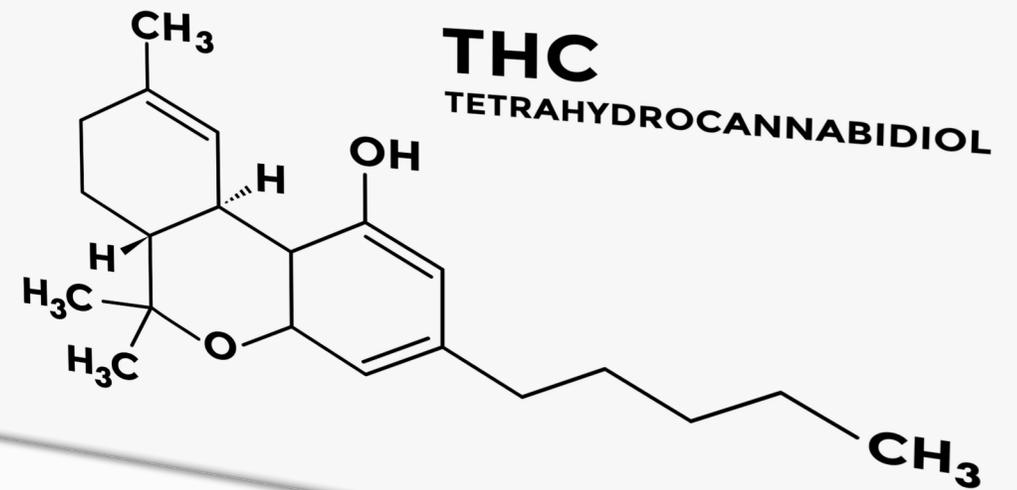


“All marijuana-infused products shall be manufactured in a licensed manufacturing facility. Any facility that extracts resins from marijuana using combustible gases or other dangerous materials, without a manufacturing license, shall incur a penalty of \$10,000.”



“All marijuana product sold in Missouri shall have originated from marijuana grown and cultivated in a licensed cultivation facility located in Missouri.”

19 CSR 100-1.100(4)



“Any tetrahydrocannabinol, such as THC-A, Delta-8, or Delta-10, in a marijuana product manufactured by a manufacturing licensee shall only be derived from marijuana cultivated in Missouri by a licensed cultivator;

Establishing Standard Operating Procedures (SOPs)

19 CSR 100-1.100 (4)(J-L)

“Establish and follow in the event the facility is suspended or ordered to cease operations.”

“Establish and follow detailed SOPs for marijuana product remediation.”

“Establish and follow to ensure marijuana remains free from contaminants.”

A Closer Look at 19 CSR 100-1.100(4)(L)

To ensure marijuana remains free from contaminants the procedures must address at minimum;

- “The flow through a facility of any equipment or supplies that will come in contact with marijuana including receipt and storage;”
- “Employee health and sanitation;”
- And environmental factors such as:

Surfaces that are smooth, hard and easily cleaned- in all areas where marijuana will be present.

Temperature and humidity controls

System for monitoring environmental conditions

System for cleaning and sanitizing rooms and equipment

System for maintaining any equipment used to control sanitary conditions

For CUL/MAN facilities- air supply filtered through high efficiency particulate filters under positive pressure.

Quality Management Systems Requirements



Licensees shall implement a Quality Management System (QMS) using a published standard, within one (1) year of the date the facility receives department approval to operate.

The chosen standard shall be applicable to the licensee's facility type and be implemented with emphasis on regulatory compliance.

QMS of licensee's choice must be a published standard such as those offered by International Organization for Standardization, ASTM International, Cannabis Safety and Quality or Foundation of Cannabis Unified Standards.

19 CSR 100-1.100(4)(M)



“Consumption of marijuana product on the licensed premises, including any approved transport vehicles is prohibited.

All licensees shall post a sign at the employee and public access points to the facility that consumption of marijuana product is not allowed on the licensed premises.”

Signage and Advertising

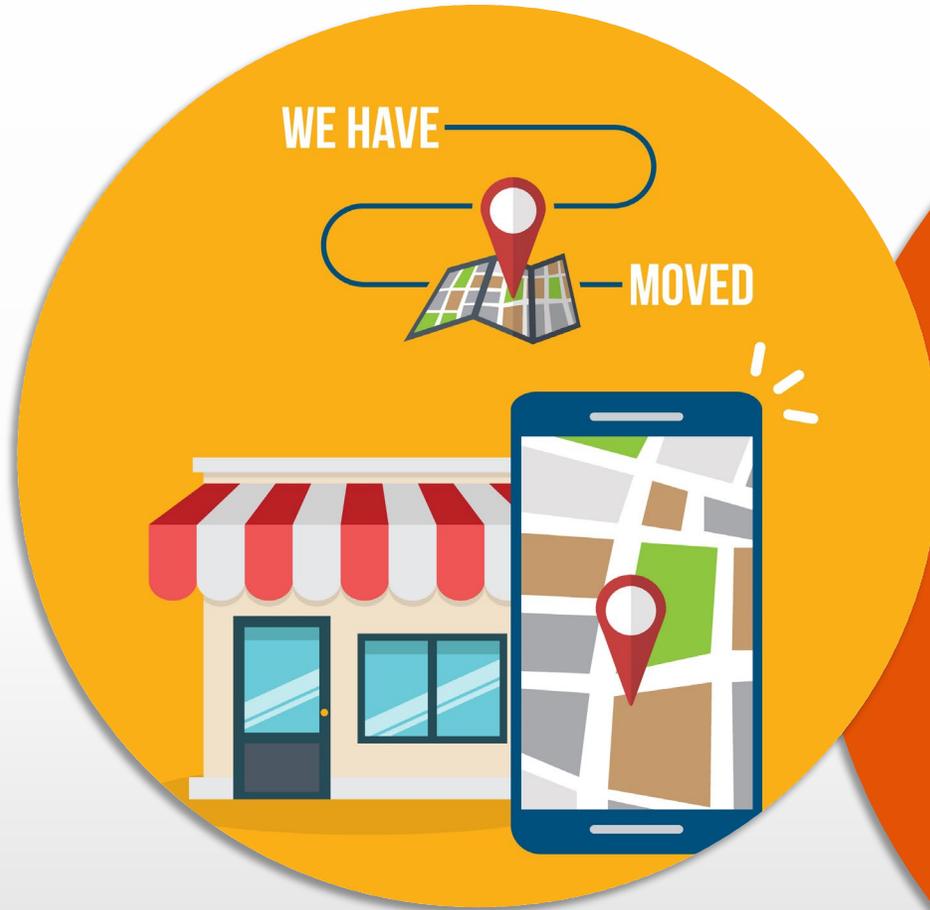


“No licensee shall use exterior signage or advertising that does not accurately reflect a licensee’s legal name, business name or d/b/a or trade name on record with the department.”

“Marijuana product may only be advertised or marketed in compliance with all applicable municipal ordinances, state law and rules that regulate signs and advertising.”

No advertisement of marijuana may contain:

- “Any statement representing the use of marijuana has a curative or therapeutic effects or tending to create effects unless such statement has been evaluated and approved by Food and Drug Administration”
- “Any content that is attractive to children, including but not limited to the shape or any part of the shape of an animal or fruit, including realistic, artistic, caricature or cartoon renderings and artistic, caricature or cartoon renderings of the shape or any part of a shape of a human”
- “Any Statement concerning a brand of marijuana that is inconsistent with any statement on the labeling”



“In the event that licensee loses control of their approved location, facility, or license, the license shall be suspended or restricted until a new location is approved or access to the facility or license is restored.”

Marijuana Product Recall

19 CSR 100-1.100(4)(P)



“The department may issue notice of marijuana product recall to licensees or the public if, in its judgement , any particular marijuana product present a threat or potential threat to the health and safety of qualifying patients or consumers.

All facilities are responsible for complying with recall notices.

Recalled items must be immediately pulled from production or inventory and quarantined until such time as the department determines the item safe, may be remediated or must be destroyed.”

[Health.mo.gov/safety/cannabis/recalls.php](https://www.health.mo.gov/safety/cannabis/recalls.php)

Operations Under Management Agreements

19 CSR 100-1.100(4)(N)

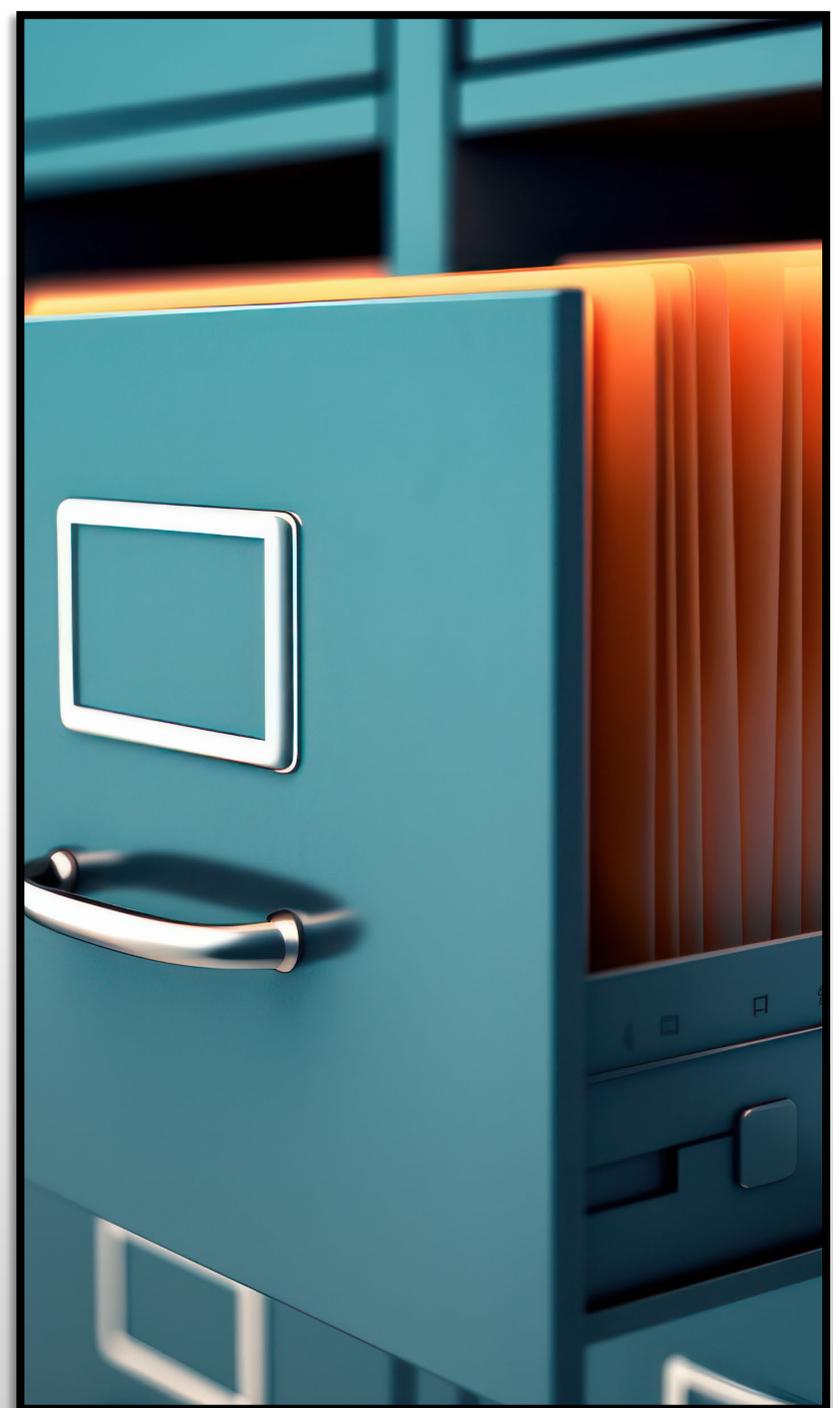
“If a licensee enters into a contract with a management company or other entity to run all or part of the regulated marijuana operations under this chapter, the contract must permit the licensee to access the licensee-related records of the management company or other entity at the request of the department during an investigation or inspection.”



- Microbusiness licenses may have a management agreement. Licensees are responsible for their license and all activities, including contractors.

“All licensees shall maintain any records required by this chapter for at least five (5) years.”

19 CSR 100-1.100(4)(O)





MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

**Inventory Control
and
Seed-to-Sale Tracking**

19 CSR 100-1.130

Inventory Control Systems & Procedures

- Licensee must designate a facility agent for inventory control.
- All inventory records are maintained for at least 5 years.
- Facility scales are to be National Type Evaluation Program (NTEP) approved.

State-Wide Track & Trace

- Metrc is the official state-wide track & trace system for DCR.
- Licensees may use a seed-to-sale system certified by DCR that interfaces with Metrc; however, accurate inventory must be recorded in Metrc.
- Certified seed-to-sale vendors can be located on [Metrc's validated integrator's page.](#)



State-Wide Track & Trace

“Each licensee shall use the state-wide track and trace system as its system of record to track marijuana product from seed or immature plant stage until the marijuana product is either purchased by a consumer, qualifying patient or primary caregiver; expended during testing; or destroyed.”

- All Marijuana product in a facility must be always traceable in the state-wide track and trace system.
- Traceability is attached on immature plants when the plant is 8 inches tall or 8 inches wide.
- New packages are created when a marijuana changes categories or it is incorporated into a different product.

State-Wide Track & Trace

At the beginning of each day licensees will enter inventory, this includes:

- Harvest
- Acquisitions
- Sales
- Disbursements
- Remediations
- Disposals
- Transfers
- Ending Inventory

Some additional Items that are recorded:

- Seeds
- Plant Locations
- Pesticides
- Herbicides
- Agricultural Chemicals & Ingredients
- All active & inactive ingredients for final product
- Serving or dosage for final manufactured product

State-Wide Track & Trace

All licensees must ensure the accuracy of information entered in the state-wide track and trace system daily:

- Metric inventory records **must** reflect the physical inventory at the facility at the end of each day.
- Monthly inventory reports that reconcile physical inventory with inventory recorded in the state-wide track and trace system are submitted to the department.
- Discrepancies in inventory are to be investigated by management and reported to the department at CannabisCompliance@health.mo.gov **within 24 hours**.
- Reduction in inventory due to suspected criminal activity by a facility agent, licensee shall report the facility to the department at CannabisCompliance@health.mo.gov and appropriate law enforcement agency **within 24 hours**.
- Errors involving consumer must be reported to CannabisCompliance@health.mo.gov and corrected **within 24 hours** of being identified.



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

How to Notify DCR and Report Required Information

To properly notify the Division of Cannabis Regulation(DCR), licensees shall email the DHSS.DCR-Compliance inbox and their assigned Compliance Officer.



DHSS.DCR-Compliance email:
CannabisCompliance@health.mo.gov



Webpage: <https://health.mo.gov/safety/cannabis/>



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Item Approval Process

19 CSR 100-1.120

Justin Smith
Compliance Assessment Manager

Required Elements

19 CSR 100-1.120(1) “All marijuana product shall be produced, packaged and labelled in a manner that protects public health and is not attractive to children.”

Minimum Requirements

Packaging

- Must be resealable, opaque, and certified as child resistant.
- Shall be constructed from FDA-approved food contact substances.
- When packaged in a series of containers, the container closest to the product must be compliant with these requirements.

Labelling

- Requirements apply to containers, wrappers, packages and methods of administration.
- All marijuana product shall be clearly and conspicuously labelled with “Marijuana” as well as a prominently displayed universal symbol.

Compliance Label

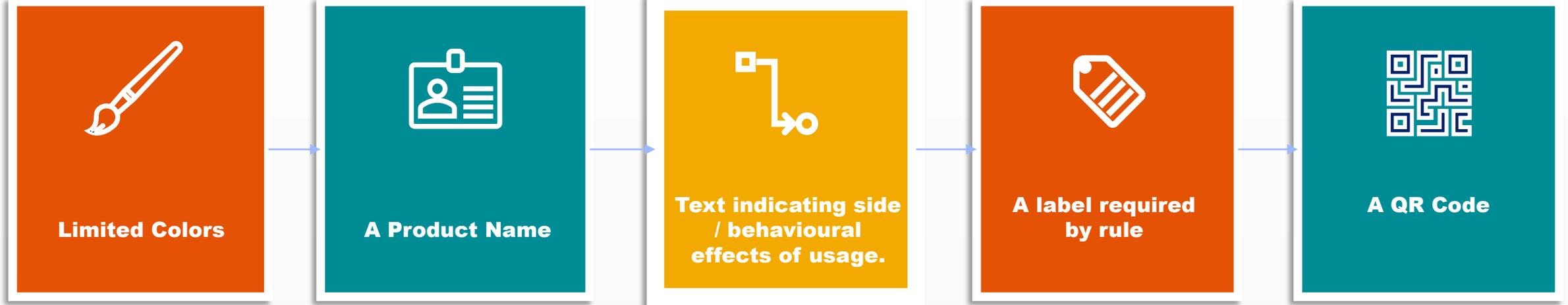
- The marijuana product container closest to the product shall bear a label displaying only the information listed in rule, in the order provided from top to bottom and left to right.
- 19 CSR 100-1.120(1)(C)2.A-M lists the required components of the compliance label.

Seeds or Plants

- Marijuana seeds and plants shall be clearly and conspicuously labelled with “Marijuana” at least as large as any other words on the packaging and a universal symbol.
- Seed packaging must bear a label with the strain information.
- Plant packaging must bear a label with the strain information and propagation date.

Optional Design Elements

19 CSR 100-1.120(1)(B)5 All Marijuana product packaging design, including that for exit packaging, may only utilize-



“Limited colors, including a primary color as well as up to two (2) logos or symbols of a different color or colors, whether images or text, provided that the widest part of a logo or symbol is no wider than the length or height, whichever is greater, of the word “Marijuana” on the packaging.”

Product name is the common or usual name of the product. The product name should closely resemble the item name entered into Metrc and should include cannabinoid ratios.

Text may not make any unfounded nutritional, health, structure/function, and/or implied claims.

Text must clearly communicate the side effects and behavioral effects and may not be a slogan or other statement of aspirational or ambiguous meaning.

The compliance label is required to be on the container closest to the product, but licensees may also include it on the outer layer of packaging as permitted by rule.

The QR code can link to a website where a purchaser can learn more about the product. The QR code may not include the additional wording “scan here” and may not include a logo or image.

The Approval Process

19 CSR 100-1.120(2). Prior to use, all marijuana product designs, packaging designs, and label designs must be submitted to the department for review of compliance with section (1) of this rule.

METRC

(A) Submission must be made through a department provided, web-based system by the licensee that is responsible for ensuring compliant packaging and labeling, pursuant to section (3) of this rule.

Complete Submission

Within thirty (30) days of submission, the department will communicate in writing to the licensee whether the submission is complete.

1. If deemed incomplete, the department will identify reasons why it determined the submission is incomplete and will deny the application.

Compliant Submission

2. If deemed complete, the submission will be approved or denied within sixty (60) days of the original submission. (C) Once a design has been approved, the licensee will receive an approval number for the marijuana product, packaging and label design, as a whole.

Who's Responsible

****All marijuana product shall be compliantly packaged and labeled by the cultivation, manufacturing or microbusiness wholesale facility providing the final marijuana product for sale**

****Except where cultivation or microbusiness wholesale facilities are providing dried, unprocessed marijuana to dispensary licensees for use in creating prerolls or for dispensing directly to consumers or qualifying patients in custom amounts. In such a case, the dispensary facility is responsible for ensuring the product is compliantly packaged and labeled prior to sale.**



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Contact Us

Facility Communication and Guidance Page:

<https://health.mo.gov/safety/cannabis/facility-comms-guidance.php>

Packaging, labeling, and product design guide:
<https://health.mo.gov/safety/cannabis/pdf/packaging-labeling-and-product-design-guide-072023.pdf>



CannabisProductCompliance@health.mo.gov



573-751-8782



Health.Mo.Gov



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Licensee Notification and Reporting

19 CSR 100-1.100(6)

Jasmine Cooley
Compliance District Manager

Rule Requirement

19 CSR 100-1.100(6)

- Licensees have a duty to keep the department apprised of certain information.
- Failure of a licensee to report required information to the department may result in *administrative penalties, to include a fine of up to ten thousand dollars (\$10,000), suspension, or revocation of the license.*
- The following slides outline information that is required to be reported by licensees;

Required Notifications

19 CSR 100-1.100(6)

(Continued)

- ❖ “Licensees shall notify the department **within twenty-four (24) hours** following the occurrence of an event that affects the health and safety of the facility or its employees, including injury to employees or other persons at the facility resulting in medical care being administered by a medical professional.”
- ❖ “Licensees shall notify the department **within twenty-four (24) hours** of discovery of any theft or attempted theft of marijuana product.”
- ❖ “Licensees shall notify the department **within twenty-four (24) hours** of discovery of any criminal misconduct of an employee, contractor, owner or volunteer.”

Required Notifications

19 CSR 100-1.100(6)

(Continued)

- ❖ “Cultivation licensees shall notify the department before changing its cultivation practice (indoor, outdoor or greenhouse) or modifying the ratios of cultivation practices it uses, as provided in the cultivation section of this chapter.”
- ❖ “After the department approves a change in location, the licensee shall request a commencement inspection as required pursuant to this chapter.”

Note: *Cultivation license means a medical marijuana cultivation facility, a comprehensive marijuana cultivation facility or a microbusiness wholesale facility licensed to cultivate marijuana*

Required Notifications

19 CSR 100-1.100(6)

(Continued)

- ❖ “Licensees shall notify the department in writing prior to initiating a facility update that would be subject to 19 CSR 100- 1.090, such as adding point of sale equipment in a dispensary or replacing windows or doors.”
- ❖ “Within the notification, licensees shall provide their plan to remain in compliance with applicable rules of this chapter and ensure security of the facility and marijuana product during the update.”



MISSOURI DEPARTMENT OF
HEALTH &
SENIOR SERVICES

How to Notify DCR and Report Required Information

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MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Marijuana Product Testing

19 CSR 100-1.110

Division of Cannabis Regulation



“Testing licensees shall test all lots of marijuana product produced by medical and marijuana facilities, including prerolls created at dispensary facilities but excluding seeds and plants, before it may be sold for use by a patient or consumer.”

19 CSR 100-1.110(1)(A)

Testing Requirements

- All final marijuana product is required to be mandatory tested by a certified testing licensee.
- There are 10 certified testing licensees, which are listed on the [DCR website](#).





Sampling Requirements for Mandatory Testing

19 CSR 100-1.110(5)

Sampling Requirements

19 CSR 100-1.110(5)

- “Sampling of marijuana product for mandatory testing shall be done by the testing licensee at the harvest lot or process lot level. All samples must be collected, stored, and transported in a way that mitigates contamination and degradation.”
- “Sampling of each harvest lot or process lot shall be conducted with representative samples such that there is assurance that all harvest or process lots are adequately assessed for contaminants and that the cannabinoid profile is consistent throughout.”
 - “In the case of dry, unprocessed marijuana, the maximum amount of marijuana from which a sample may be selected is fifteen pounds (15 lbs.), and a minimum of five tenths of a percent (0.5%) of a harvest lot will be sampled for testing.”

Process Lot Weight		Sample Required (1±0.2 g)
Pounds	Kilograms	
0-0.50	0-0.23	4
0.51-1.5	0.24-0.68	8
1.51-3.00	0.69-1.36	12
3.01-6.00	1.37-2.72	16
6.01-10.00	2.73-4.58	20
10+	4.58+	32

In the case of extracts, concentrates, distillates or isolates the amount of material required for sampling is displayed above

Sampling Requirements

19 CSR 100-1.110(5)
(Continued)

- “Where marijuana will be sold in a method of administration, the marijuana product must be sampled after it has been processed into its method of administration. All other marijuana products may be sampled in bulk after all processing of the harvest lot or process lot is complete.”

Units for Sale	Representative Sample Units Required
2-15	2
16-50	3
51-150	5
151-500	8
501-3,200	13
3,201 – 35,000+	20

In the case of vape cartridges, prerolls, infused prerolls and all other infused products or items sold in a method of administration, the amount of material required for sampling is displayed above



Mandatory Sample Ordering and Chain of Custody.

19 CSR 100-1.110(6)

Mandatory Sample Ordering

19 CSR 100-1.110(6)

- “Testing licensees shall collect samples of a marijuana product from other licensees for mandatory testing, and no licensee may interfere with, assist with, or otherwise participate in the physical collection of a representative sample by a testing licensee.”
- “At the time of sampling for mandatory testing, the cultivation, manufacturing, or dispensary licensee must make the entire harvest or process lot available to the testing licensee for sample collection.”
- “An employee of the cultivation, manufacturing, or dispensary licensee shall be physically present to observe the sampling process and to ensure representative samples are taken from throughout the lot.”
- “Sampling of the lot shall take place in a designated sample area within the cultivation, manufacturing, or dispensary licensee’s facility.”

Chain Of Custody

19 CSR 100-1.110(6)

Cultivation, manufacturing, and dispensary licensees will collaborate with testing licensees to create a chain of custody record that includes at least the following information:

1.

“The sending facility’s
license number”

2.

“The legal name,
address, and contact
information of the
licensee sending the
marijuana product for
testing”

3.

“The testing facility’s
license number”

4.

“The legal name, address
and contact information
of the
testing licensee”

Chain Of Custody

19 CSR 100-1.110(6)
(Continued)

Cultivation, manufacturing and dispensary licensees will collaborate with testing licensees to create a chain of custody record that includes at least the following information for each lot to be sampled:

The marijuana product category

Total mass of the harvest or process lot

The marijuana product sample tag number



The sending facility's license number

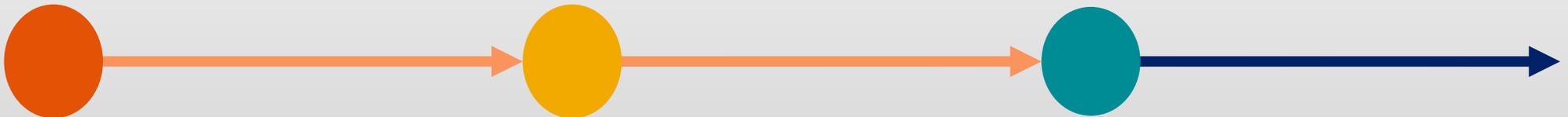
For infused products, the number of units for sale in the marijuana process lot

Total mass of the marijuana harvest or process lot sample

For infused products, the number of units sampled of the marijuana process lot

Whether the test or tests requested are for mandatory testing or for voluntary testing

Whether the marijuana product was remediated



Identification of the test or tests requested

Whether a lot is being re-sampled because of a failed mandatory test

The date, name and signature of both the requesting facility's representative who was present for sampling and the testing facility's representative who conducted the sampling

Chain Of Custody

19 CSR 100-1.110(6)
(Continued)

“Chain of custody records must be retained by both the requesting licensee and the testing licensee for at least five (5) years.”



RETAIN RECORDS



Mandatory Testing Requirements

19 CSR 100-1.110(7)

Mandatory Testing

19 CSR 100-1.110(7)

- “Testing of each harvest lot or process lot shall be conducted such that there is assurance that all harvest or process lots are adequately assessed for contaminants and that the cannabinoid profile is consistent throughout.”
- “The testing results must be reported **within ten (10) days** of collecting sample and **within twenty-four (24) hours** of completing analysis of a sample, the testing licensee shall file a report in the state-wide track and trace system”



Voluntary Testing

19 CSR 100-1.110(9)

Voluntary Testing

19 CSR 100-1.110(9)

- “Upon request from a cultivation, manufacturing or dispensary licensee, testing licensees may also test material that was not collected by the testing licensee according to the rules for mandatory test sampling. Results from such voluntary tests will not satisfy mandatory testing requirements.”
- “All test results from voluntary testing must be reported in the state-wide track and trace system.”



Testing Failures

19 CSR 100-1.110(10)

Testing Failures

19 CSR 100-1.110(10)

- “The department will place an **administrative hold** on marijuana product that fails mandatory testing through the state-wide track and trace system.”
- “All product that fails mandatory testing must be reanalyzed, remediated or destroyed **within three (3) months** of initial test failure. Product that fails mandatory testing may be reanalyzed, remediated, or destroyed”
- “Before taking action with any product that fails mandatory testing, licensees must, **within fifteen (15) days** of test failure, notify the department of their intent to proceed in one of the following ways:”
 - A. “Reanalysis of previously tested sample;”
 - B. “Remediation of the harvest or process lot through remediation actions specifically allowed by rule;”
 - C. “Destruction of the harvest or process lot; or”
 - D. “Submission of a request to perform remediation not specifically allowed by rule”

Heavy Metal Failures

19 CSR 100-1.110(10)(C)

“Marijuana product that fails mandatory testing for heavy metals shall be placed on administrative hold through the state-wide track and trace system pending disposal or, if approved by the department, reanalysis. **Product that fails testing for heavy metals may not be remediated.**”

Approved Remediation Processes

“Marijuana product that fails testing, **except for heavy metal failure**, may be remediated. After notifying the department of intent to remediate, licensees may conduct the following remediation processes without additional approval:”

19 CSR 100-1.111(11)

(A)

“Failed microbial screening may be remediated through solvent-based extraction or processing, such as hydrocarbon, ethanol or carbon dioxide”

(B)

“Failed residual solvent testing may be remediated by returning the product to a purging process within the facility”

(C)

“Failed water activity testing may be remediated by—
1. Solvent-based extraction or processing; or
2. Additional drying or curing;”

(D)

“Failed chemical residue screening may be remediated through solvent-based extraction or processing, such as hydrocarbon, ethanol or CO₂”

(E)

“A lot that fails reanalysis may not be reanalyzed again but may be remediated **one (1) time**”

(F)

“A lot that fails remediation may not be remediated again but may be reanalyzed **one (1) time**”



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Marijuana Waste Disposal

19 CSR 100-1.150

Division of Cannabis Regulation



Marijuana Waste Disposal

19 CSR 100-1.150(1)

“Unused marijuana product and any solid and liquid wastes generated during marijuana product production and processing must be stored, managed and disposed of in accordance with applicable state, tribal, local and municipal laws and regulations. Licensees must keep records of the final disposition of all such wastes for at least five (5) years or longer if required by federal, state, local law.”

Licensee Responsibility for Waste

- It is the licensee's responsibility to ensure that "wastewater generated during production and processing is disposed in compliance with all applicable state, tribal, local and municipal laws and regulations."
- Licensees are responsible for determining if the waste qualify as hazardous waste per 40 CFR 262.11. If a licensee's waste qualifies as hazardous waste it is subject applicable hazardous waste management standards.



19 CSR 100-1.150(3) and (5)



All Marijuana Waste Must Be Securely Stored

Prior to final disposition, waste must be stored, in a locked, tamper-resistant receptacle in an area designated for waste disposal.

These designated areas must be under the appropriate security measures as outlined in 19 CSR 100-1.090.

Rendering Non-Hazardous Waste

“Other methods of rendering waste or locations of final disposition must be approved by the department *prior to implementation.*”



Product waste that does not qualify as hazardous may be rendered unusable



By grinding and incorporating the marijuana product waste with other non-hazardous ground materials so the resulting mixture is **at least 50% nonmarijuana waste by volume.**



Rendered waste may be disposed of at a permitted solid waste facility for final disposition

Waste Disposal Logs

Each licensee shall maintain a waste log which will be provided to the department upon request that will contain at least the following:

WHEN

- Date and time of the destruction.

WHERE

- Location and camera angle names the destruction took place.

HOW

- Method of destruction and mixing medium.

WHO

- Agent ID of the employee(s) who destroyed the marijuana product



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

Transportation and Transfer Of Marijuana Product

19 CSR 100-1.140

Division of Cannabis Regulation

Transportation and Transfer Of Marijuana Product

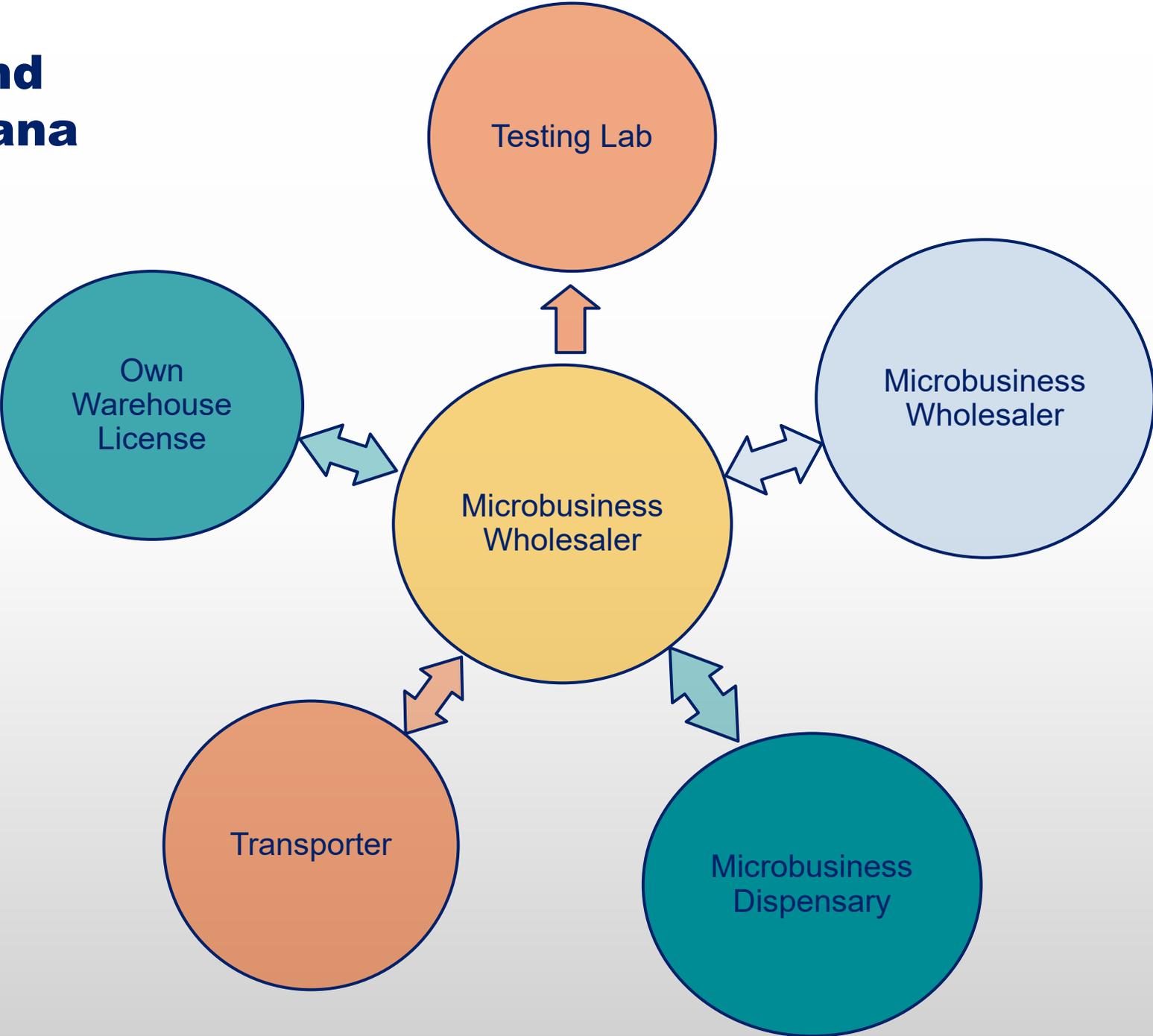
19 CSR 100-1.140

- Prior to operation a licensee must request and pass a commencement inspection (including inspection of each vehicle and new inspections for additional vehicles added as new spaces) per 19 CSR 100-1.030(3).
- A licensee may choose to request to commence their own transport vehicle, or they may work with certified transportation licensees.

[Licensed Marijuana Transporter List](#)



Transportation and Transfer Of Marijuana Product



Delivery of Marijuana Product to Consumers, Qualifying Patients and Primary Caregivers

Products may be delivered by a dispensary licensee or transportation licensee that has been granted approval to operate per **19 CSR 100-1.140(3)(A)**.

At the time of delivery licensees must:

- Require production of patient/caregiver ID card.
- Require production of valid government issued photo ID to verify age and identity.
- In the case of plant purchases, a cultivation ID card must be verified.
- Record delivery of product in the statewide track and trace system.



19 CSR 100-1.140(3)(D)

Transport Vehicles

Per **19 CSR 100-1.140(4)(B)** should be equipped with the following-

“Secure lockboxes for storing payments and video monitoring equipment during transit.”

“Have secure lockbox or cargo area made of smooth, hard surfaces that are easily cleaned for storing marijuana product during transit.”

“Video monitoring of the drive and passenger compartment and any space where marijuana product is stored or can be accessed during transit.”

“Vehicles should not be marked in any way that indicate that marijuana product is being transported.”

“Have GPS Tracking.”



GPS and Video Monitoring Requirements in Transportation Vehicles

Per **19 CSR 100-1.140(4)(F)**, all vehicles commenced to transport marijuana product shall have:

“Electronic video monitoring video cameras with a recording resolution of at least 1920 x 1080, or the equivalent, at a rate of at least fifteen (15) frames per second, that operate in such a way as to allow identification of people and activities in the monitored space, in all lighting levels, and that are installed in a manner that will prevent the video camera from being readily obstructed, tampered with, or disabled.”

“Video cameras must provide coverage of the driver and passenger compartment of the vehicle, and any space where marijuana product is stored or can be accessed during transit, including any doors that lead to where the marijuana product is stored.”

“Licensees must store all recordings from the video cameras and GPS data for at least sixty (60) days in a secure on-site or off-site location or through a service or network that provides on-demand access to the recordings that allows for providing copies of the recording to the Department upon request, in the requested format, at the expense of the licensee.”

“Video monitoring must be active at all times when the marijuana product is inside, entering, or exiting the vehicle.”



Per **19 CSR 100-1.140(4)**, the transportation licensee must ensure the following:

“Transport all marijuana product from an originating facility to an authorized destination **within thirty-six (36) hour** of taking possession of the marijuana product.”

“If the transfer or deliver is unable to be completed for any reason, the transportation licensees shall return the marijuana product to the originating licensee.”

“When extenuating circumstances necessitating holding the marijuana product **longer than the thirty-six (36) hours**, the licensee transporting the marijuana product shall notify the Department of the circumstances and location of the marijuana product **prior to the end of the thirty-six (36) hour transportation deadline.**”

Before, During and After Transport

Important Information for Transporting Agents

Before

Complete and print an inventory manifest for the trip from the state-wide track and trace system.

During

Facility Agents need to have Agent ID and Drivers license accessible at all times.

During

Keep a copy of the inventory manifest and trip plan within the reach of the driver for the duration of the trip.

During

Have a cell phone or other means to readily communicate with individuals or entities outside of the transport vehicle, including law enforcement and the Department, accessible at all times.

After

If the plan was modified for any reason, update the trip plan to reflect the actual route.

Vehicle Accident or Malfunction

Licensee Responsibility for Notification

19 CSR 100-1.140(4)



“The facility agent transporting product shall report any vehicle accidents in which the transport vehicle is involved, **within one (1) hour to law enforcement** and the licensed or certificated entity for whom the agent is transporting.”

“Any vehicle accident or malfunction that occurs during transport of marijuana product, theft, attempted theft or loss of marijuana product shall be report to the Department **within two (2) hours** of the licensee becoming aware.”

Transfers Between Licensees Operating on the Same Premises



Per **19 CSR 100-1.140(5)**, when transferring marijuana product to another licensee located on the same premises the transporting agent shall:

- “Prior to transferring marijuana product, complete and print an inventory manifest generated from the statewide track and trace system, which shall be provided by the facility from which the marijuana product is transferred.”
- “Transfer of marijuana product may be done by motor vehicle or other secure means. During transfer, facility agents must:
 - Have Facility Agency Identification Card(s) accessible at all times.
 - Have a copy of the applicable inventory manifest and trip plan accessible for the duration of the transfer.”
- “Any incident of theft, attempted theft, or loss of marijuana product during transfer **shall be reported to the Department within two (2) hours** of becoming aware of the incident.”

Summary

- Bureau Structure
- Commencement Inspection Preparation and Processes
- Facility Security
- Facility Employee Training
- Facility-Specific Permitted Activities
- General Operations
- Inventory Control and Seed-to-Sale Tracking
- Item Approval Process
- Licensee Notification and Reporting
- Marijuana Product Testing
- Marijuana Waste Disposal
- Transportation and Transfer of Marijuana Product

Facility Communication and Guidance Page:

<https://health.mo.gov/safety/cannabis/facility-comms-guidance.php>



MISSOURI DEPARTMENT OF
**HEALTH &
SENIOR SERVICES**

QUESTIONS?



CannabisProductCompliance@health.mo.gov



573-751-8782



Health.Mo.Gov

BREAK | NETWORKING





Username

Password

Log in

- ⚙ Don't recall your username? Recover it
- ⚙ Can't access your account? Reset your password
- ☑ First time users, use your log-in key

- 👤 Sign up for Training
- 📺 Training Videos

Thaddeus Bowie
Director, Customer Success



MISSOURI DEPARTMENT OF
HEALTH &
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Tara McKinney, Public Outreach Director
Division of Cannabis Regulation

DCR Communication Resources



DCR Communication and Resource Center

One-stop shop for communication & resources.



The Cannabis Connection

Quarterly Newsletter
Your information link to Missouri's Division of Cannabis Regulation.



DCR Podcast

Monthly podcast highlighting all the hot topics around DCR.



Email Subscription

Gov Delivery email subscriptions. Sign up for topic specific email lists.

<https://health.mo.gov/safety/cannabis/comm-res-center.php>

Tell Us Something Good!

We love to hear from licensees. Is your business doing something innovative, interesting, or new that you would like to share with us? Email Tara McKinney, Public Outreach Director at DCRC@health.mo.gov and we may contact you for an in-person meeting with the DCR Director and Deputy Director to hear more about it!



MISSOURI DEPARTMENT OF
HEALTH &
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Contact Me

Email:

DCRC@health.mo.gov

or

Tara.McKinney@health.mo.gov



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Abigail Vivas, Chief Equity Officer
Division of Cannabis Regulation



BUSINESS RESOURCES

- Colleges / University Collaboration
- Small Business Education
- Financial Resources (outside of funding)
- Cannabis Associations



MICROBUSINESS LOGO

CONCEPT: Develop a logo specific and exclusive to licensed Cannabis Microbusinesses.

- Differentiate microbusinesses from current licensees.
- Promote businesses as licensed microbusinesses.



**CANNABIS
MICROBUSINESS**

LICENSED BY THE MISSOURI DEPARTMENT
OF HEALTH AND SENIOR SERVICES



**CANNABIS
MICROBUSINESS**

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OF HEALTH AND SENIOR SERVICES



LOGO USAGE

- Optional use
- Packaging
- Advertising
- In-store promotions

LIVE POLL

Would you be interested in using a logo, provided by the department, to identify your products or business as a microbusiness?



VOTE!

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QUESTIONS AND ANSWERS



FINAL THOUGHTS