

Title: Reporting Transactions in Marijuana Pharmacies

Policy No. I.A.29

Approved: 08-14-2019

Revised:

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1. The Louisiana Medical Marijuana Tracking System (LMMTS) is a “seed-to-sale” information system designed to capture and manage data from multiple stakeholders in the production and distribution of medical marijuana products. The scope of the information system, which has been used in multiple states with dispensary distribution models, extends to the dispensary acknowledging receipt of product purchases from the producers and the subsequent reporting of consumer sales transactions back to the tracking system by dispensaries. In one state, the system reports such sales transactions to the state prescription monitoring program using a patient registration number collected by the dispensary.

2. The question has arisen whether Louisiana’s marijuana pharmacies are required to report their dispensing transactions to LMMTS and whether LMMTS can satisfy the pharmacies’ obligations to report such dispensing transactions to the Louisiana PMP. The Board’s rules for marijuana pharmacies require those pharmacies to enter all inventory-related transactions in LMMTS.

Chapter 24. Limited Service Providers

Subchapter E. Marijuana Pharmacy

§2457. Standards of Practice

D. Recordkeeping Requirements

4. Inventory of Marijuana Product

b. The pharmacy shall access the LMMTS and enter all inventory-related transactions in that system.

[LAC 46:LIII.2457.D.4.b]

3. Marijuana pharmacies are required to establish and maintain a perpetual inventory of all marijuana products acquired, held, dispensed, and disposed by the pharmacy. The Board requires all marijuana pharmacies to have access to LMMTS for the purpose of acknowledging receipt of medical marijuana products purchased from a marijuana product producer. The product information from LMMTS will include a product identification number which will serve as a proxy for the National Drug Code (NDC) number in the pharmacy’s dispensing information system. Since there is no patient registration system for medical marijuana products in Louisiana, the LMMTS does not contain the required information to report patient-specific prescription transactions to the state PMP.

4. Following their consideration of the issue, the members voted unanimously for the following motion:

Resolved, to interpret LAC 46:LIII,2457.D.4.b to require marijuana pharmacies to acknowledge deliveries of marijuana products from the product manufacturers, as well as any returns to those manufacturers, in the Louisiana Medical Marijuana Tracking System (LMMTS); however, product dispensing transactions are not inventory-related transactions reportable to LMMTS