COLORADO
Department of Revenue
Marijuana Enforcement Division

Compliance Tip *Updated*　　　　　　　　　　　　　　　　**August 4, 2022**

Topic: Marijuana Employee List and Business Administrator Requirements in Metrc

Applicable Rules: 3-805 and 3-905(A)(3)(a)

The Colorado Department of Revenue's Marijuana Enforcement Division (MED) is issuing this updated Compliance Tip to highlight certain regulations, offer information, and provide guidance to Licensees regarding the state-mandated Inventory Tracking System (Metrc) employee list and administrator requirements. This Compliance Tip is being released in addition to a prior Compliance Tip (November 9, 2016) regarding employee lists.

The Metrc Employee List: This list within Metrc must include all employees who physically work on the business's Licensed Premises (i.e., any employee who reports to the facility in person). Additionally, the employee list may be used to meet more general employee list requirements of MED Rule 3-905(A)(3)(a).

Why This Is Relevant: MED Rule 3-805 requires that updates and additions into Metrc must be accurate, including employee lists. Regulated Marijuana Business employee lists in Metrc must be current. In an effort to maintain transparency and proper points of contact within Metrc, the MED requests that all Licensees review their employee list in Metrc to ensure accuracy. Also, the MED will initiate a proactive notifications program to aid in the validity of Metrc data and will use contact information provided in Metrc.

Updating the Employee List in Metrc: After reviewing the facility's employee list, any current employee with Metrc access and with permission to Manage Employees can update the list. To make changes to the employee list, when on the Metrc homepage, hover over the Admin heading and select Employees from the dropdown list:
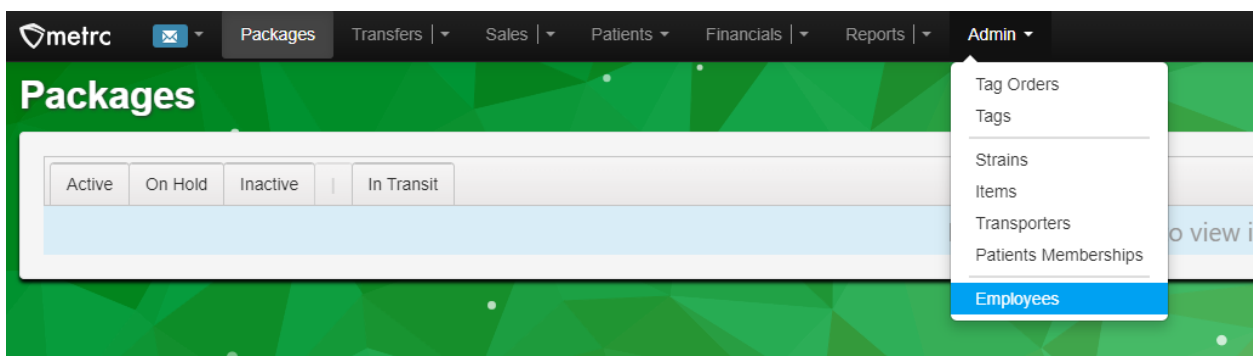
On the Employees page, navigate to the top left of the page to find the option to add or edit Employees. Highlight an employee name to edit those credentials. Editing credentials will allow you to change permissions for the individual selected. To remove an employee completely, select the employee's name and then click the trashcan icon on the right.

When adding a new employee, confirm that you are providing the proper credentials, consistent with the job duties and role of that position. Consider reviewing the written job description to reaffirm which permissions the new employee needs to have within the Metrc system for the employment role.

The MED advises caution when granting the Manage Employees Permission to employees with Metrc access. Any employee with that privilege in Metrc is able to add employees and managers and to edit or remove all employees, including themselves and the Industry Admin. Accidental deletion of employees or the Industry Admin can cause substantial inconvenience to the licensee.

Additional Metrc Administrator Requirement: MED Rule 3-805(B) requires that one Owner Licensee fill the role and receive the title of "Industry Admin" in Metrc, because owners have a vested interest in the effective and compliant management of the business. If an employee, rather than an owner, is designated as the Industry Admin, that employee has the ability to change which facilities are listed under the business, block other employees from Metrc access, and make a variety of significant, high-authority technical changes in the Metrc account. The status of Industry Admin in the Employee list can be granted only by Metrc Support, as only one is allowed per account.

The Industry Admin automatically receives all permissions. Additionally, the Industry Admin receives the authority to add new facilities, under the Facilities tab, which is a privilege that cannot be granted to any other employee. The Industry Admin also has the authority to change the "Current Name" of the facility in Metrc.

The Industry Admin can credential other employees and give as many Metrc privileges and permissions as those employees would need to fulfill their duties. Additional employees may be granted administrator privileges and permissions, but without receiving the title or status of Industry Admin, in Metrc. Any employee with Metrc access may be granted all applicable permissions for each license type. (The number of those will vary, depending on the license type.)

Per MED Rule 3-905(A), above, listing all employees and owners in the Metrc Employee tab does fulfill the requirement of maintaining a complete list of owners and staff. Monitoring and updating the employee list in Metrc may provide ease of recordkeeping, with all Licensee names in one place.

If you have questions or concerns regarding the information shared in this Compliance Tip, please send the MED an inquiry. For questions regarding Metrc functionality, please contact Metrc Support (support@metrc.com or 1-877-566-6505).