

Silver State Government Relations



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Cannabis Control Board,

On January 19, 2021, members of the Nevada CCB, for the first time, informed cannabis laboratories that there would be changes initiated to the Metrc reporting (interface). This would create a substantive disruption in the laboratories reporting of Certificates of Analysis.

The CCB initially stated that the reporting changes would be made mandatory effective Monday, January 25, 2021. Later in the same meeting, another representative of the CCB stated that the change would be effective February 1, 2021.

SCS is willing to support, and comply with, changes in the reporting requirements. However, to implement such changes requires coordination between software programs that all cannabis laboratories use. Unless we take enough time to rewrite the software and test these APIs results could be disastrous, with downstream implications such as manual data entry for hundreds of thousands of data points. The manual entry of data is problematic for two reasons: it increases the possibility of human error in reporting test results; and greatly increases the time required to finish each COA. Each COA may have up to approximately 155 data points reported, with each of these data points potentially being multiple numerals or letters. Each 1000 COAs reported per month would require up to 155,000 data points to be entered manually.

Metrc made similar changes in Michigan late last year with disastrous results, taking several months to resolve. Michigan does not have a program that is anywhere near as active as Nevada. There is no reason to make the same mistake in Nevada. Changes to the existing software systems should not be rushed through without proper rewriting and integration.

Confident Cannabis is the most widely used laboratory information management system (LIMS) by cannabis laboratories in Nevada. Integration of their LIMS with Metrc is critical to allow for automated data transfer and entry from laboratories to Metrc. It's imperative that any changes introduced by Metrc allow Confident Cannabis adequate time to roll out a new, tested, API for this data transfer.

We are not opposed to changes to Metrc reporting but we respectfully request that the timeframe for implementation be appropriate, likely two months, now that the complexity of the issue has been brought to your attention. I've included below a letter from Confident Cannabis to explain the situation and provide additional detail on what happened in Michigan late last year.

Respectfully,

Will Adler

Executive Director, Scientists for Consumer Safety

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From: Steve Albarran <sa@confidentcannabis.com>
Sent: Thursday, January 21, 2021 12:21:52 PM
Cc: API Support <api@confidentcannabis.com>
Subject: Notice of Upcoming Metrc Integration Changes

Dear All,

As you may know, Metrc recently announced they will be making substantial changes to the way labs must use Metrc. As part of these changes, the Metrc API we use to post lab results through Confident Cannabis and the structure of the data we post to Metrc will change materially. As such, we would like to describe what you should expect and how you can prepare in advance.

Context

Late last year, Metrc made similar changes to their API in Michigan. Unlike with Nevada, Metrc did not provide labs or software integrators any advance notice or a user guide before or even after the fact. This clearly caught us and our labs "flat footed", and we scrambled to develop the required updates.

In the meantime, labs were forced to manually enter all of their lab results through Metrc's user interface, which greatly slowed down turn-around times and increased labor costs for labs for roughly two months. To make matters worse, Metrc continued to make changes, even after they said they were done on five separate occasions.

Fortunately, however, we have since developed tooling to rapidly change field mappings on the fly. Had we had this tooling when Metrc Michigan changed, labs would have likely been able to use their Confident Cannabis integration within a few weeks.

What this means for you

- Despite multiple requests, Metrc will not provide the information we would need to map the new fields. As such, we will need to make updates on the fly **after** Metrc deploys their changes and adjust accordingly.
- ***Our Metrc integration will certainly be down*** for a few days and possibly as long as a month.
- You should ***make plans for manual entry*** during that time (perhaps hire part-time data entry people).
- Even after we map to the new fields, they may change the fields again, even when they say changes are done.

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- The process to update our field mappings will be iterative and will require close cooperation with you. **We'll need your help** to tell us specifically what isn't working, provide screenshots of the errors you see in Confident Cannabis and Metrc, and provide package tag IDs for trouble shooting

To address any questions or concerns you have, we will host a **conference call tomorrow, Friday 1/22 at 1pm PT with this dial in: 650-262-1286**

Thanks for your support and understanding as we work through this process.

Best regards,

Steve

Steve Albarran
Co-Founder & CEO
[Confident Cannabis](#)