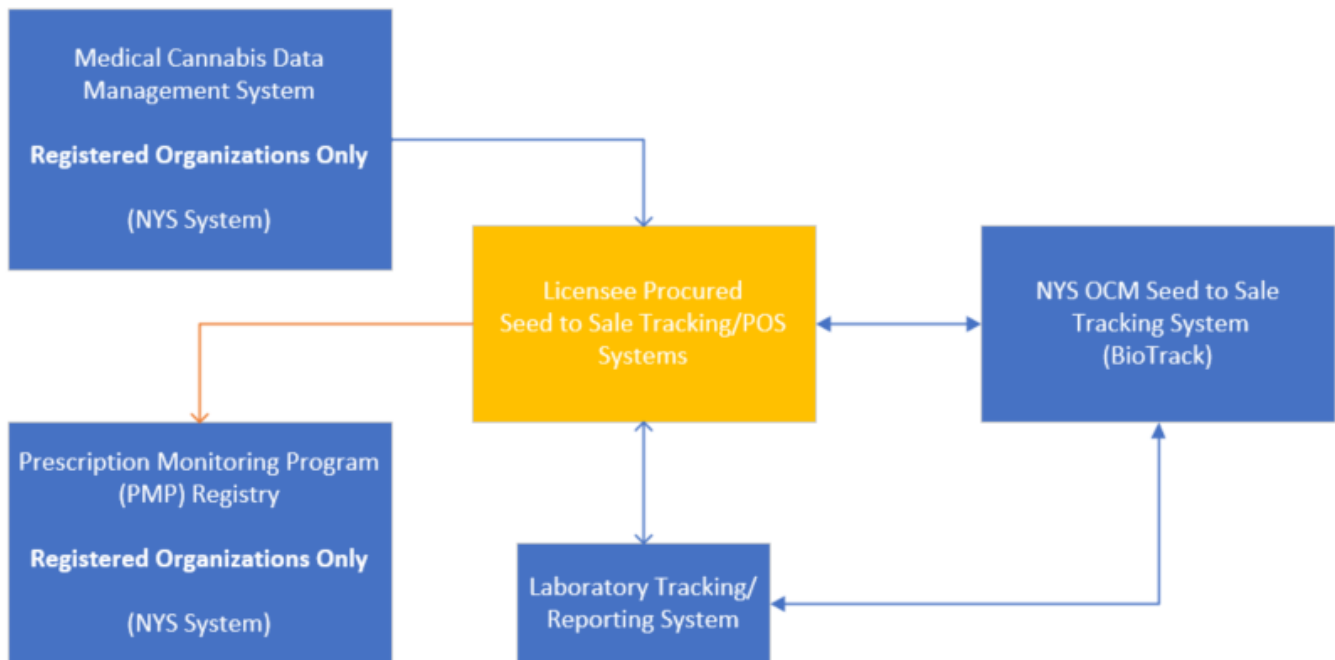




Pursuant to Section 78 of the Cannabis Law, the Office of Cannabis Management (OCM) requires all licensees to utilize an electronic system that tracks cannabis as it moves through the supply chain from seed to sale. All licensees are required to obtain a software which will collect data regarding the possession of cannabis and will transmit such data to OCM via an electronic transaction, also known as an application program interface (API). OCM will publish the API on our website as soon as it is finalized.

When working with a software vendor to identify what will best meet your needs, please ensure the vendor you select has capabilities to transmit data via API to OCM's contracted solution BioTrack THC. Please share the sample API provided by OCM on 08/31/2023 with your vendor. A sandbox environment will be provided for integration testing prior to go-live.





## 1. Do I have to use BioTrack?

Licensees are **not** required to use BioTrack as their inventory tracking system. They are free to use any third-party software they want. BioTrack may not tell licensees that they are required to use their tracking system in order to transmit data to the state. The only requirement is that the tracking system be able to transmit data to OCM's BioTrack system. All licensees are required to have an inventory tracking system that will transmit data through an application program interface (API) to OCM's BioTrack system. When researching or looking into an inventory tracking/seed-to-sale/POS for your business, it is best to confirm that the vendor can submit data to OCM's BioTrack system using the NY-API.

In the email sent on 08/31/2023, OCM shared a sample of the application program interface (API) structure, using Florida's data elements. Please work with your selected vendor to ensure their capability of meeting this interface. The NY- API will be published and shared, once finalized.

## 2. Are there exceptions to having an inventory tracking system?

No. Pursuant to Section 78 of the Cannabis Law, licensees are required to purchase and use their own electronic inventory tracking system. Licensees have flexibility in the vendor and system they wish to use, but the system that is used must be able to transmit data to OCM's system (BioTrack THC).

## 3. What is the difference between a seed-to-sale, point of sale and an inventory tracking system?

Summarized below are the differences.

- Inventory Tracking System – software that allows inventory level tracking in real time.
- Seed-to-Sale – software that allows inventory tracking of a cannabis plant from the seed until it is sold to the consumer allowing for full traceability of the cannabis product through different stages of cultivation, processing, transportation, and sale.
- Point of Sale – software that allows a business to make sales to consumers, collect payment from those sales and also tracks cannabis product inventory. Licensees that currently hold or are applying to hold a license authorized for retail sale must have a POS system in place.

Based on which vendor you choose, you could have one system or multiple separate systems to conduct inventory tracking and point of sale transactions. The data required for transmission to the State seed to sale tracking system may differ by license type. Contained in the email sent on 08/31/2023, OCM shared Florida's API as an example of data elements to be transmitted via the application program interface (API). Now that this example has been



provided, please share it with your selected/prospective vendor. This API, while not New York's specific API, will provide vendors with a framework that will help them evaluate whether their own electronic inventory tracking system can capture and transmit this type of data via API. A sandbox training environment will be provided once ready with the New York specific API.

**4. When do I need to obtain a 3<sup>rd</sup> party inventory tracking system?**

All licensees are required to have an electronic inventory system in place now. Licensees must obtain a 3<sup>rd</sup> party inventory tracking system that will be capable of integrating with the NY-API within 60 days of the NY-API being available. The Florida-API was sent to licensees on 08/31/2023; this information can be shared with the licensee's vendor of choice to ensure all requirements are met.

**5. When do I need my system to be integrated with the OCM system?**

The timeframe for integration with the NY-API is still pending. Details will be shared as they become available. Until details become available, the Florida API can be reviewed for integration requirements.

**6. How much does BioTrack cost?**

OCM does not impose a fee on licensees to submit their data to the State's traceability system. Licensees must contact the vendor they are interested in using, to obtain more information regarding pricing of inventory tracking systems. OCM cannot quote pricing for third-party systems.

Licensees do not have to purchase BioTrack as their inventory tracking system, however they must choose and ensure a third-party system that can transmit data to OCM's BioTrack system.

Licensee will be required to purchase 16-digit identifiers (tags) that integrate with the BioTrack solution, based on their license type. OCM is working with BioTrack to outline the process for obtaining the unique 16-digit digital identifiers from BioTrack. More information will be provided once available.

**7. How do I obtain tracking tags with the unique 16-digit identifier?**

OCM is working with BioTrack to outline the process for obtaining the unique 16-digit digital identifiers from BioTrack. More information will be provided once available.



**8. What is the registration process?**

BioTrack will provide each active licensee (as identified by OCM) with a unique key to integrate. More information will be coming in the near future regarding the registration process.

**9. Do you have a list of compatible vendors?**

OCM cannot provide a complete list of compatible vendors. Licensees should reach out to their vendor of choice to confirm compatibility with BioTrack and may share the FL API documentation emailed on 8/31/23 as a sample.

**10. How can I get help with my application program interface (API)?**

Please contact your selected inventory tracking system vendor for assistance with the API. A sandbox training environment will be available for testing prior to go-live. OCM will provide all licensees with the contact information for BioTrack support once available, which may be shared with your vendor.

**11. Will there be a sandbox environment provided for testing integration?**

A sandbox environment will be made available with the NY final API to test integration in advance of the integration deadline. More details will be shared as they become available.

**12. How will I know what data must be tracked and when to report it to OCM based on my license type?**

All inventory data MUST be tracked. OCM will define all data that will be required to come through the API.

**13. Will I still need to submit routine inventory reports after integration with the NY-API?**

After the integration, inventory report submission will no longer be required because OCM will be able to access Licensee inventory electronically, through the API.

**14. How is THC tax calculated in BioTrack?**

THC tax is for wholesale sales between licenses authorized for distribution and licenses authorized for retail sale. Licensees must work with their contracted vendor on calculating and



entering applicable taxes. Information that the licensee enters will be transmitted via the API to OCM's BioTrack.

**15. How will licensees and the Office be able to see quantities sold in a certain time frame as opposed to quantities remaining?**

Licensees will need to work with their vendor to determine how they will see quantities sold in a certain timeframe on their inventory tracking system. Information entered into a licensee's system will be transmitted via API to OCM's BioTrack system. OCM will be able to view the information in BioTrack as it is received by the licensees' inventory tracking system.

**16. Once inventory is transferred out of an AUCC's inventory tracking system and into an AUCP's inventory tracking system, how is a sale tracked on the Cultivator's side?**

The licensee's inventory tracking system will need to show record of the inventory that has been transferred out of their inventory to another licensee's inventory; the licensee receiving the inventory will need to record the inventory being received. Section 125.8 of Title 9 Part 125 General Operating Requirements and Prohibitions includes additional information regarding a licensee's inventory and tracking requirements.

**17. Will I need to switch from using the OCM transportation manifest to using the BioTrack manifest after integration?**

You can continue to use the OCM Transportation Manifest; entering the transfer in the API is not a substitution for a transportation manifest. Transportation manifests are a requirement set forth in Section 125.10(g) of Title 9 Part 125 General Operating Requirements and Prohibitions.

**18. Will sales be recorded twice for products that are sold from AUCC to AUCP and then from AUCP to CAURD licensees?**

Licensees are required to submit their data to OCM's BioTrack seed-to-sale system via API. Each licensee's transactions will be captured, demonstrating movement of the product through the supply chain. Therefore, it is expected that OCM will see each record of sale as the product moves from an AUCC to an AUCP.