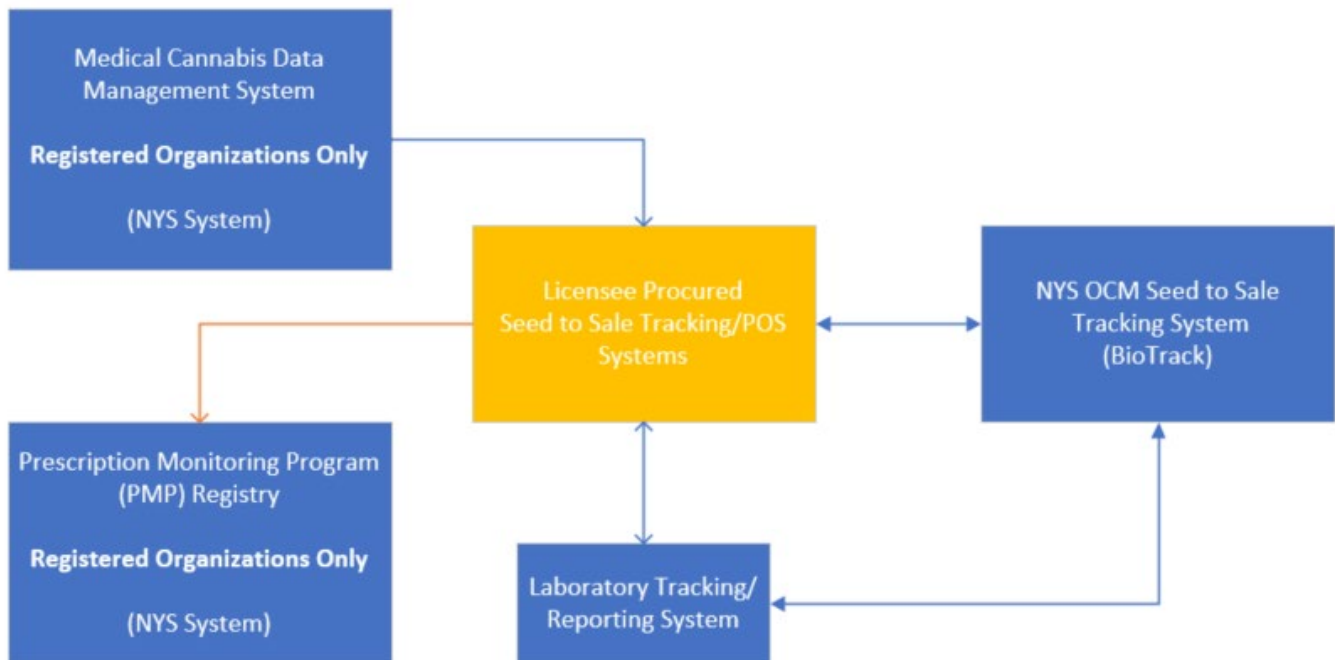




Pursuant to Section 78 of the Cannabis Law, the Office of Cannabis Management (OCM) requires all licensees to utilize an electronic system that tracks cannabis as it moves through the supply chain from seed to sale. All licensees are required to obtain software which will collect data regarding the possession of cannabis and will transmit such data to OCM via an electronic transaction, also known as an application program interface (API). The NY - API can be found here: <https://licensee-api.sandbox-ny.biotr.ac/>.

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 API <https://licensee-api.sandbox-ny.biotr.ac/> 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 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.

Please work with your selected vendor to ensure their capability of meeting this interface. The NY-API can be found here: <https://licensee-api.sandbox-ny.biotr.ac/>.

## 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 (POS) – software that allows a business to make sales to consumers, collect payment from those sales and 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. The API, <https://licensee-api.sandbox-ny.biotr.ac/> 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 is available to those integrators who register with BioTrack.



#### 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. By January 17, 2025, licensees must obtain a 3<sup>rd</sup> party inventory tracking system capable of integrating with the NY-API. The API <https://licensee-api.sandbox-ny.biotr.ac/> should 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?

By January 17, 2025, Licensees must obtain a 3<sup>rd</sup> party inventory tracking system that will be capable of integrating with the NY-API. The Office will share additional information regarding the implementation logistics, and timeframe for integration as they become available.

#### 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 will cover a total of \$250,000 in tag purchases across licensees at the launch of the project. Additional details will be made available as the program is rolled out with the vendor and licensees. Please review the information provided by BioTrack here: <https://cannabis.ny.gov/system/files/documents/2024/04/official-tag-guidelines.pdf> to help you prepare for the upcoming integration.

#### 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?

All inventory tracking and LIMS vendors must create an account and register through the BioTrack Integrator Portal. This portal enables vendors to manage API keys and receive notifications about system updates. The BioTrack Sandbox (Test) Integrator Portal is located at <https://licensee-api.sandbox-ny.biotr.ac/devportal>.



**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 and share the API <https://licensee-api.sandbox-ny.biotr.ac/> to confirm compatibility with BioTrack.

**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. For support, software vendors may contact BioTrack at [NYIntegrator@biotrackthc.com](mailto:NYIntegrator@biotrackthc.com), and licensees may reach BioTrack at [NYHelp@biotrackthc.com](mailto:NYHelp@biotrackthc.com). Webinars will soon be scheduled for integrators and licensees, with further details and scheduling information forthcoming.

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

The API is available at <https://licensee-api.sandbox-ny.biotr.ac/>. This API provides a Sandbox (Test) environment that inventory tracking system vendors and Laboratory Information Management System (LIMS) vendors can utilize to establish integration with the NY STS Tracking System. Vendors selected by each Licensee must register via the Integrator Portal to receive their sandbox log-in credentials.

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

The API outlines which data elements are tracked for each licensee to report to OCM via the API. All inventory data MUST be tracked.

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

Since licensee integration with NY-API will be completed in stages, some transfer of inventory will likely take place between a non-integrated licensee to an integrated licensee. To ensure cannabis products can be monitored by OCM as they move through the supply chain, licensees must continue to submit routine inventory reports until the Office advises otherwise. Additional guidance on how to report transfer of cannabis inventory between integrated and non-integrated licensees is forthcoming. Licensees must ensure all supplemental recordkeeping such as manifests and invoices are available for inspection upon request.



**14. 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.

**15. Once inventory is transferred out of a cultivator's inventory tracking system and into an processor's inventory tracking system, how is a sale tracked on the cultivator's side?**

The cultivator's inventory tracking system will need to show record of the inventory that has been transferred out of their inventory to the processor's inventory; the processor 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.

**16. 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.