MINNESOTA
OFFICE OF CANNABIS MANAGEMENT

GUIDANCE MEMO GM-2025-01

Final Plan of Record (FPOR) Submission Guidance

To: Cannabis Business License Applicants
From: Minnesota Office of Cannabis Management, Enforcement Division
Subject: Guidance for Completing Final Plans of Record (FPOR)
Date: July 3, 2025

As the Office of Cannabis Management (OCM) has begun reviewing submitted final plans of record (FPORs) from preliminarily approved applicants, we have observed several common issues that prevent submissions from meeting the required standard for completeness and accuracy. To assist applicants and support timely processing, OCM is issuing this additional guidance to clarify expectations and help you prepare an approvable FPOR.

Guidance for Preparing a Complete Final Plan of Record (FPOR)

1. Do not submit before you are ready.

Applicants should only submit their FPORs once their facility is fully built out and all aspects of their business operations are ready to begin. The FPOR must reflect actual, functioning systems and procedures – not future plans. Submitting an FPOR before your business is operationally ready may result in delays to the review process and licensure.

2. Demonstrate operational readiness.

Your FPORs must show that your business is ready to begin operations in full compliance with all applicable laws and rules. This means the information you provide should reflect systems that are fully built out, protocols that are finalized, and staff roles that are clearly defined. Site-specific procedures must be described in detail.

3. Describe current, implementable practices.

Your FPORs should reflect how your business will function as of the day your license is issued. It must include only current, finalized practices. Plans that are incomplete or still in development will not meet the readiness standard.

4. Address all required components.

Many FPOR prompts are multi-part. Be sure to capture every component of each question in your response. Responses that are incomplete or only partially address the requirements will be returned for revision.

5. Tailor responses to your business and facility.

Your FPOR must reflect the specific physical layout, operations, and business model of the licensed premises you are applying for. Avoid generic or templated content. Submissions that do not clearly reflect the unique aspects of your business will not be approved.

6. Reference standard operating procedures (SOPs) clearly and accurately.

If you refer to SOPs in your FPOR, you must ensure they are up-to-date, reflect your current operational practices, and are available for review by OCM inspectors during the on-site inspection. You may do this in one of two ways:

- Include the full text or relevant sections of the SOP directly in the FPOR.
- Provide a summary of the SOPs contents, along with the SOP's title, version number, and approved date.*

Note: Listing an SOP title alone is not sufficient. Your FPOR must contain enough detail for OCM to confirm the SOP exists and supports the practices you describe.

7. Provide specific and verifiable details.

Your FPORs must include specific details to support your operational readiness. When asked about systems, tools, or partnerships, avoid vague or generic responses. For example, if referencing software (such as point-of-sale), include the actual product name. If you are working with external vendors for auxiliary services, such as security, pest control, or accounting, identify the name of the company. Submissions that lack this level of detail will be considered incomplete and may be returned for revision.

8. Know your opportunities to revise and resubmit.

If your FPORs do not meet OCM's compliance standards, OCM will provide you with specific feedback outlining the areas that require clarification or correction. You will have the opportunity to revise and resubmit your FPOR for further review. *Please note that deficiencies requiring revision will delay the issuance of your license.*

** Applicants for testing facility licenses must submit the full text of SOPs where requested in the FPOR. Summaries are not sufficient in these cases, and failure to provide the complete SOP may result in the FPOR being deemed incomplete.*

Examples of Acceptable Final Plan of Record Responses

Below are examples of acceptable answers. This is not meant to be prescriptive but is intended to provide examples of answers that meet requirements.

Site, Security, and Operations Final Plan of Record

OCM prompt: Describe how the business will record when the storage area (s) was accessed, and by whom, and which regulated products were added or removed from the storage area.

Example answer: *Per our business's SOP 1:1 Site Security and Operations Plan (version 1, 6/1/2025), the storage area is locked and controlled by badged key card access to those authorized to access the area (managers/shift supervisors/owners). The keycard usage is logged electronically each time it is used and records the person accessing, time, date of access. There is also a paper log inside the storage room which the employee must fill out that also has the same information as well as which product has been accessed and indicates whether that product was added or removed from the area. Any products removed or added are entered into the statewide monitoring system under the appropriate purpose for removal or movement. The entire storage area is also under video surveillance 24 hours.*

Quality Assurance SOP Final Plan of Record

OCM prompt: Describe the specific product recall response procedures your business will take if required, in response to a manufacturer or office-ordered recall.

Example answer: *Per our business's SOP 1:2 Recall Policy and Procedure (version 1, 6/1/25), if our business is notified of a recall by either our supplier or the OCM, we will immediately implement our recall response procedures by following the steps detailed in the SOP. Response procedures include: QA manager oversees all recall response activities; all response activities are logged on the internal recall response form; a trace back and trace forward procedure is completed; affected batches are quarantined immediately; and if any product has been distributed to customers, the business notifies the individual customers of the recall and how they should respond by email within three business days.*

Inventory Control, Storage, and Diversion Prevention Final Plan of Record

OCM prompt: Describe specific procedures for how your business will manage inventory audits and any necessary reporting after an incident of theft or another security breach.

Example answer: *Inventory audits against the POS system will be conducted for the products in the storage area weekly on Sundays after the close of business. A full audit of all products in the entire store, including on the showroom floor, will be done monthly on the last day of the month after the close of business. An audit report is printed from the POS system and designated staff checks the report against the physical inventory in the storage room. The on-duty manager checks all physical inventory records, signs, and dates. Any discrepancies must be investigated and reconciled. An explanation for the discrepancy must be recorded in the statewide monitoring system. If a significant quantity of product is discovered missing, local law enforcement and the OCM are notified immediately by phone. A theft report is written by the on-duty manager documenting missing inventory, steps that were taken to secure the area and other products, and any employee statements or other evidence gathered. Video footage is reviewed in the area where the product went missing. After the incident, management will review the business's response and discuss and document any corrective actions that can be implemented to prevent such an event in the future.*

Contact Us

If you have questions or need assistance while completing your final plans of record, please contact OCM at enforcement.ocm@state.mn.us.