

IMPACT EVALUATION

Post-Report Follow Up

OCTOBER 2025



LOFT
LEGISLATIVE OFFICE OF
FISCAL TRANSPARENCY

Report #22-268-01

Regulation of Oklahoma's Medical Marijuana Industry

In 2022, LOFT evaluated the status of regulation of the State's burgeoning medical marijuana industry; the result of a successful 2018 initiative petition that legalized the product. LOFT's review found that three and half years after the approval of State Question 788, Oklahoma had the most accessible medical marijuana market in the country, with the greatest percentage of licensed medical marijuana patients, greatest number of dispensaries, and the greatest number of growers in any state with medical marijuana.

Factors contributing to Oklahoma's market status included low barriers to entry for both businesses and patients. For example, Oklahoma had some of the lowest license fees for businesses, with no license limits, and was just one of three states that did not require a physician to verify a qualifying condition for patient access. LOFT also found that the short period of time prescribed by the State Question to establish a regulatory office led to enforcement and compliance that could not keep pace with market growth. LOFT identified best practices from other states with more established medical marijuana programs that could be adopted in Oklahoma to provide an effective regulatory system.



LOFT's 2022 Report Found:

- 1.State Question 788 Created the Most Accessible Medical Marijuana Industry in the Nation
- 2.Oklahoma's Rapid Implementation of Medical Marijuana did not Allow for Development of an Adequate Regulatory Structure
- 3.A Strengthened Regulatory Structure is Key to Identifying and Achieving Evidence-Based Goals



Summary of Agency Actions Since LOFT 2022 Report

After becoming an independent agency in 2022, OMMA enacted processes to improve both its internal operations and its regulation of the industry. OMMA's efforts have focused on using data and partnerships to ensure transparency and accountability of its program, creating a consistent and efficient review of commercial applications, implementing a combination of software solutions and training for standardized inspection procedures, and creating a Patient Services unit within the agency that collaborates with physicians to ensure that the medical marijuana program is focused on medical patients and the safety of products.



Agency Cost Savings, Efficiencies, & Key Legislation



Improved data and technology have enabled OMMA to gain efficiencies in its operations, including reducing its employees by 39 full-time positions, reducing the amount of leased office space, and using data management systems to improve processes. OMMA projects a combined savings of approximately \$4.2 million for FY26 from these actions.

More than 30 bills pertaining to OMMA have been implemented since the LOFT report was issued in 2022, including establishing OMMA as an independent agency, creating a tiered commercial grower fee structure based on size and type of facility, requiring OMMA to create a "secret shopper" program to test samples from dispensaries, authorizing OMMA to operate a quality assurance lab, expanding the scope of other State agencies involved in law enforcement, and enhance packaging and labeling requirements to ensure patient safety.

The goal of Impact Evaluations is to foster accountability by assessing the status of recommendations issued in the original evaluation report and any related agency actions to address identified challenges.



LOFT Recommendation to Agency	Status			Agency Comments
	No Action	In Progress	Complete	
Develop an annual strategic plan with quantifiable and attainable measures to evaluate its performance in regulating the medical marijuana industry				OMMA implemented a strategic plan in 2023 that is updated annually. Key Performance Indicators include metrics for licensing efficiency, compliance outcomes, and public engagement. Progress toward strategic initiatives are reported annually through OMMA's public Annual Report.
Enhance the data collected from medical marijuana business applications to obtain more information on growth and changes in the industry, and to inform the review process.				OMMA requires applicants to provide detailed documentation regarding ownership, residency, complete background checks, and provide proof of compliance with state requirements. This information, combined with data from OMMA's seed-to-sale software, ensures that only applicants that meet all qualifications for licensure are approved.
Develop a more comprehensive supply chain management strategy, including process implementation for the upcoming seed-to-sale tool and other strategies for collecting quality data to inform decision-making.				OMMA fully implemented Metrc, the State's seed-to-sale tracking system, providing real-time monitoring of medical marijuana from planting, harvesting, processing, testing, and sale. Inspectors now compare physical inventory to Metrc records during every inspection. OMMA also uses NCS Analytics to analyze seed-to-sale data and identify anomalies or unusual activity for further review.
Work to improve the quality, quantity, and transparency of available data for medical marijuana metrics to allow for future evidence-based investments				Using a combination of data platforms and collaboration with state and local law enforcement units, OMMA is able to make real-time, data-driven decisions. OMMA is currently deploying new licensing and inspection software to further integrate all licensing and compliance data in one location. OMMA also maintains internal dashboards to highlight trends, and provides an external dashboard to legislators. (available HERE)

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