

Incident Reporting

Alabama

We know you're committed to playing by the rules and moving the industry forward with integrity, professionalism and excellence. **Things may go wrong** at some point. Whether it was a mistake, a rogue employee or a security issue caused by a patient or caregiver... your Compliance Director will need to reach out to the AMCC to inform them of what occurred.

You may be asked to contribute to an incident log/detailed report. Pay attention, be **attentive to details**, and always **be sure to fill out associated documentation as soon as possible**, while the details are fresh in your mind. Of course, we can review security camera recordings, and your perspective and insights may be imperative to assisting in company, law enforcement or AMCC investigations. Be sure to **maintain all related documentation** for **at least 2 years** or while still under investigation.

Reportable Incidents

The following incidents must be reported to the AMCC and law enforcement (when applicable) within **24 hours** of the event or discovery (asap is best):

- Any form of diversion, theft or loss of cannabis
- Injury to any person on the licensed premises or off-premises if it involves an employee
- "Material changes" in licensing information, particularly where such change will or could pose a risk to employees, patients, caregivers, or members of the public
- "Material breaches" of the licensee's policies and procedures that were supplied during the license application or any amendment thereto.

If you become aware of any of the above, please notify management immediately so your business can stay in compliance with these reporting requirements.

538-X-8-.05 Applications And Licensing Procedures As To Dispensaries Generally.

(m) The Dispensary Applicant's Security Plan must include a plan for security at each facility, including but not limited to the following:

15. Dispensaries shall maintain, review and update policies to report theft, diversion, or other loss of cannabis products to the Commission and to law enforcement as early as practicable and not more than 24 hours from the event or its discovery.

538-X-4-.07 Duty To Meet And Maintain Standards, Policies, Procedures and Operations Per Application.

A licensee has an ongoing duty to meet and maintain the standards, policies, procedures, and operations as it affirmed to the Commission at the time of licensing, as such standards, policies, procedures, and operations may have been amended by the licensee from time to time in accordance with Rules 538-X-4-.08 and 538-X-4-.19. Specifically, at the time of the licensee's pre commencement inspection and at each inspection thereafter, a licensee must meet and/or maintain the following, in the manner previously provided at the time of licensing, as updated (i.e., current to within 30 days, unless otherwise required):

(12) The following documents, labeled, and in the following order:

(o) The licensee's verified Standard Operating Plan and Procedures. The licensees must demonstrate and maintain standard operating procedures regarding the following subjects in such a way that they can be readily accessed from the physical site of operations upon the request of inspectors, the Commission, or Commission staff, including, at a minimum, the following:

11. A Security Plan as to each of the licensee's facilities, addressing all of the following aspects of security and meeting the following minimum thresholds:

- i. Alarm systems must be installed in all facilities where cannabis or medical cannabis is maintained or stored. Such alarms shall be provided and installed by experts in industry standard commercial-grade alarm systems. Alarm systems must be fully operational securing all entry points and perimeter windows, be equipped with motion detectors and pressure switches covering all areas where cannabis or medical cannabis is grown, handled, stored, prepared, transported, tested, or dispensed.
- ii. Reception areas and personnel adjacent to ingress and egress points shall have ready access to duress panic and hold-up alarms that may be activated in the event of access by unauthorized personnel or intruders.
- iii. Licensee facilities shall maintain an audio/video surveillance system that shall be in continuous operation 24 hours per day. Recording devices shall be fixed in place covering both the interior and exterior of the facility, in such quantity and at such resolution as shall allow for the clear identification of individuals and activities in all reasonably accessible areas of the premises, including but not limited to all point-of-sale areas, entrances, exits, parking lots, and any area where cannabis or medical cannabis is grown, handled, stored, prepared, transported, processed, packaged, labeled tested, or dispensed. Audio recordings shall clearly and accurately capture sound within camera range at a level of 20 decibels or greater. Audio/video surveillance recordings must clearly and accurately display the time and date.
- iv. The facility's perimeter and any outdoor premises must be surrounded by a sufficient fence or barrier to prevent access by unauthorized persons and must have sufficient lighting to allow for the proper functioning of video surveillance equipment at all times between dusk and dawn or at any other time when ambient lighting requires enhancement to permit identification of individuals or activities upon or immediately adjacent to the premises. Indoor premises must likewise be sufficiently lit to allow for the identification of individuals and activities.
- v. Exterior doors of each facility must be designed or reinforced to withstand unlawful forcible entry; exterior doors shall remain locked against outside intruders at all times, while allowing free egress by the facility's occupants in the event of an emergency; doors must permit ingress to employees and other appropriate persons only by means of a keycard or other similar electronic access device.
- vi. Exterior walls of each facility must be reinforced to withstand unlawful forcible entry. Windows, likewise, must be reinforced to prevent breakage by outside intruders.
- vii. Licensees must maintain sufficient staffing of security guards at each facility where cannabis and medical cannabis is present to reasonably ensure the safety of the products stored therein; however, licensees must maintain, at a minimum, one (1) security guard per facility during the facility's business/operating hours.
- viii. Strict access controls shall protect areas where cannabis or medical cannabis is handled or stored - in a secured, locked room or vault.
- ix. Records, whether electronic or manual, must be kept of all persons on the premises at a facility at all times, including employees, vendors, transporters, medical cannabis patients and caregivers, and all others, recording the individuals' name, date, time of ingress and egress, and (as to non-employees) the reason for their presence; such records shall be kept for a minimum of two years.
- x. Audio/Video surveillance records must be kept for at least 60 days, and longer upon the request of the Commission, its inspectors, or any law enforcement personnel. Audio/Video recordings potentially reflecting an incident of actual or attempted diversion must be kept for the longer of a period of two years, or until resolution of the incident and apprehension and discipline or prosecution of the individuals involved in the actual or attempted diversion.
- xi. Employees shall wear identification badges that clearly identify them as employees while on duty.
- xii. Visitors, including Commission members, inspection personnel, or other representatives, shall wear a "visitor pass" or "AMCC Official" pass, as applicable, at all times while on the premises.
- xiii. Licensees shall maintain, review and update policies to report theft, diversion or other loss of cannabis or medical cannabis to the Commission and to law enforcement within 24 hours of the event or its discovery.
- xiv. The Licensee, upon request, shall make available to the Commission or its inspectors all information relating to security alarm systems, monitoring, alarm activity, maps of camera locations and camera coverage, surveillance equipment maintenance logs, authorized use lists, operation instructions, and any other security related information deemed relevant by the Commission or its inspectors.
- xv. Any information and/or documents specific to the category of licensee (Cultivator, Processor, Secure Transporter, Dispensary, Integrated Facility, State Testing Laboratory,) as identified separately in these Rules.

538-X-4-.08 Duty To Notify Or Seek Permission Regarding Material Change In Licensing Information.

(1) Generally. A licensee has an ongoing duty to notify the Commission or to seek the Commission's permission regarding any "material change" (as defined at Rule 538-X-4-.19) in licensing information, particularly where such change will or could pose a risk to employees, patients, caregivers, or members of the public.

(3) Self-Reporting. A licensee's duty to report is mandatory in the event of "injury," "loss," or a "material breach" of the licensee's policies and procedures as affirmed to the Commission in the application or any amendment thereto; reports should be made promptly to the Commission, and, as applicable, law enforcement, in no event more than 24 hours after its occurrence or discovery, to allow for swift investigation and remediation.

Incident Documentation

Business/Location _____

Day/Date _____ Time of Day _____

Employee (Name & Number) _____

(Manager or Agent-in-Charge) _____

Check One:

Refusal of Service	Fake/Borrowed ID	Purchase over limit	Other
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Purchaser Information: (Name, Address, Phone and/or Description): _____

Describe in detail what happened: _____

Witnesses (check one and list name): [NOTE: Be thorough! Talk to employees who may have witnessed the event and if necessary, have them fill out a separate form].

Employee:	Patient:
Employee:	Patient:
Employee:	Patient:

List intervention techniques that were used:

Refusal of entry at front door	Yes	No
Refusal of sale at counter	Yes	No
Refusal of excess product	Yes	No
Refusal based on fake or expired ID	Yes	No
Refusal based on intoxication	Yes	No
Police Called (if necessary)	Yes (Report #)	No

Intervention strategies used other than above: _____

Manager/Agent in Charge Signature: _____

Employee Signature: _____