

Exhibit A

Disparate Scoring Illustration

7.17 Describe the RMD's incident management program, including policies and procedures to document, report, and manage adverse incidents, consumer complaints, operational concerns, and issues that will be reported to law enforcement and/or the Department. Note that a copy of the incident management program policies will be reviewed as a component of the provisional inspection process.

Brighton Health (awarded 5 points for this answer)

[Our Incident Management Program establishes policies and procedures for documenting, reporting and managing adverse incidents, consumer complaints, operational concerns and issues that will be reported to law enforcement and/or the DPH. Our program is designed to ensure the highest standards of incident management and to ensure that we are on the cutting-edge of operational performance, safety and patient satisfaction. Maintaining proper adverse incident response will be the responsibility of the COO with guidance from the Compliance Officer.

Prospect Lake (awarded 1 point for this answer)

[Our Incident Management Program establishes policies and procedures for documenting, reporting and managing adverse incidents, consumer complaints, and operational concerns that will be reported to law enforcement and/or DPH. It involves all Executive Management and staff and is designed to ensure the highest standards of incident management across departments, safety and patient satisfaction.

1) Adverse Incident Management

- a. All criminal incidents will be managed according to our comprehensive Security Policies and Procedures Manual.
- b. Appropriate measures will be taken to ensure that all medical emergencies occurring at our facility, or during the transport of marijuana, will be handled in accordance with First-Responder best practices as detailed in our Safety Manual.
- c. Appropriate measures will be taken if a patient reports adverse effects they believe are related to any of our products. These measures include:
 - Assisting the patient, family members, caregiver and/or health care providers to determine the cause of the adverse effects and how best to address the situation
 - Determining whether a particular product, batch or lot is defective
 - Documenting and reporting the source problem
 - Destroying products that are deemed harmful or hazardous

1) Policies and Procedures for Adverse Incident Management

- a. Criminal incidents managed according to our Security Policies and Procedures Manual.
- b. Medical emergencies occurring at our facility, or during the transport of cannabis, handled in accordance with First-Responder best practices as detailed in our Safety Manual.
- c. Measures will be taken if a patient reports adverse effects they believe are related to any of our products. These measures include:
 - Assisting the patient, their family members, caregiver(s) and/or their healthcare providers in determining how best to address the situation
 - Determining, through testing, whether a particular product, batch or lot is defective.
 - Documenting and reporting the source problem
 - Destroying products that are deemed harmful or hazardous

2) Consumer Complaints

- a. Every complaint will be taken seriously and documented in our files. Each will be assessed as to whether the cause of the complaint could lead to additional harm or operational problems.
- b. If the cause of the complaint is determined to be on-going, we will take corrective actions immediately.
- c. If the complaint does not pose an immediate health or safety risk, the employee receiving the complaint will report the incident to his or her manager who will log details for the Executive Management Team to formulate a proper response.

3) Operational Concerns

It is our mission to develop a company-wide policy of awareness, identification, documentation and reporting for all operational concerns. Management of operational concerns involves integration of proper checks and balances and redundancy at all levels of the operation, including:

- a. System reviews and data collection
- b. Regular and comprehensive audits
- c. Customer surveys to detect trends or issues
- d. Regular staff and one-on-one meetings

2) Policies and Procedures for Consumer Complaints

- a. With any consumer complaint we will first determine the category of the complaint and determine whether the cause of the complaint could lead to additional harm or operational problems.
- b. If the cause of the reported complaint is determined to be an on-going problem that could cause harm or adversely affect operations, we will immediately take corrective actions.
- c. If the complaint does not pose an immediate health risk, which ever employee or agent receives the complaint should first report the incident to their supervisor. The supervisor should list important details of the incident in the consumer complaint log.

3) Policies and Procedures for Operational Concerns

It is our mission to develop awareness, identification, documentation and reporting for all operational concerns. Management of operational concerns

4) Documentation

- a. All incidents and concerns must be documented
- b. All departments must maintain an up-to-date incident and concern log in hard copy and periodically transferred to electronic files
- c. The Compliance Officer must be informed and maintain files of all incidents and concerns
- d. Each incident or concern must be treated appropriately until a resolution has been achieved and documented by the Compliance Officer

involves integration of proper checks-and-balances and redundancy at all levels of the operation including:

- a. System reviews and data collection
- b. Regular and comprehensive audits
- c. Customer surveys to detect issues
- d. Regular staff meetings to gather employee input

4) Policies and Procedures for Documentation

- a. All incidents and concerns must be documented.
- b. All departments must maintain an up-to-date incident and concern log
- c. The Compliance Officer must be informed of all incidents and concerns and maintain files for each.
- d. Each incident or concern must be treated appropriately until a resolution has been achieved and documented by the Compliance Officer.

5) Reporting

DPH will be provided a timely, written notice of any incident described below by submitting an incident report in a form determined by the DPH which details the circumstances of the event, the corrective action taken, and

confirmation that the appropriate law enforcement and/or regulatory bodies were notified. These reportable incidents include, but are not limited to:

- a. Inventory discrepancies, diversion, theft, loss and any criminal action involving the RMD or a dispensary agent
- b. Any suspicious act involving the sale, cultivation, distribution, processing or production of marijuana by any person
- c. Unauthorized destruction of marijuana
- d. Any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, persons, caregivers or dispensary agents
- e. Alarm activation or other event that requires response by public safety personnel
- f. Failure of any security alarm system due to a loss of electrical power or mechanical malfunction
- g. Any other breach of security.

5) Policies and Procedures for Reporting

We will, within 10 calendar days, provide written notice to the DPH of any incident described below, by submitting an incident report in the form and manner determined by the Department which details the circumstances of the event, any corrective action taken, and confirmation that the appropriate law enforcement and/or regulatory bodies were notified.

All documentation related to an incident that is reportable pursuant to 105 CMR 725.110(F)(1) will be retained for no less than one year and made available to the Department and to appropriate law enforcement.

Our incident reporting policies and procedures require that the following incidents be managed and reported:

- (a) Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving the RMD or a dispensary agent
- (b) Any suspicious act involving the sale, cultivation, distribution, destruction or

<p><u>6) Corrective Actions</u> All incidents will undergo a corrective action assessment and implementation process under the supervision of the Executive Management Team and Compliance Officer. Incident reporting managers will be responsible for follow-up on each corrective action. We will seek corrective action feedback from law enforcement, the DPH or any governing regulatory body. We will maintain all documentation related to an incident that is reportable pursuant to 105 CMR 725.110(F)(1) in perpetuity and make it available to the DPH and to law enforcement authorities acting within their lawful jurisdiction upon request.]</p>	<p>processing of cannabis by any person (c) Any loss or unauthorized alteration of records related to cannabis, registered qualifying patients, personal caregivers, or dispensary agents (d) An alarm activation or other event that requires response by public safety personnel (e) Failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours (f) Any other breach of security.</p> <p>6) Corrective Actions Incidents will be fully documented and undergo a corrective actions assessment and implementation process under the supervision of the Executive Management Team, Compliance Officer and Board of Directors and corrective action feedback from law enforcement, the DPH or any governing regulatory body.</p>
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