



ARIZONA DEPARTMENT
OF HEALTH SERVICES

Medical Marijuana Testing
Advisory Council
Findings and Recommendations

December 2022

Medical Marijuana Testing Advisory Council: Findings and Recommendations

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1.0 Council Background

1.1 Council Duties

This report encompasses the work of the Medical Marijuana Testing Advisory Council (Council), convened pursuant to A.R.S. § 36-2821 to advise the Director of the Arizona Department of Health Services (ADHS) regarding the administration and implementation of a required medical marijuana testing program. On an annual basis, the Council is charged with reviewing the marijuana testing program and submitting a report that includes the following:

- An assessment of whether an analyte should be removed from the required testing panel;
- Information about testing-related statements of deficiency and remediation efforts for medical marijuana dispensaries, Independent third-party laboratories, marijuana establishments, and marijuana testing facilities; and,
- Any other recommendations on improving the testing programs.

1.2 Council Membership

In accordance with A.R.S. § 36-2821, the Council is comprised of the following members (named list is available in Appendix 1), appointed by the ADHS Director and chaired by the Director's designee:

1. The president or executive director of a statewide nonprofit association representing the marijuana dispensaries, or the person's designee.
2. The president or executive director of a statewide nonprofit cannabis testing association, or the person's designee.
3. The president or executive director of a medical marijuana trade association that does not primarily consist of dispensaries or cannabis laboratory testing facility owners, or the person's designee.
4. A representative of a nonprofit medical marijuana dispensary who is employed by the dispensary to cultivate medical marijuana and who has at least three years of medical marijuana cultivation experience.
5. A representative of an Arizona-based nonprofit medical marijuana dispensary that produces medical marijuana concentrates and that has been regularly sending products for testing who has at least three years of medical marijuana extraction experience.
6. A representative of an Arizona-based nonprofit medical marijuana dispensary that is primarily focused on producing medical marijuana edibles who has at least three years of medical marijuana edible production experience.
7. An owner of an Arizona-based cannabis testing laboratory.
8. A laboratory scientist who holds a doctorate or a bachelor of science degree and who has at least three years of experience in cannabis laboratory testing.
9. A registered qualifying patient.
10. A registered designated caregiver.
11. A representative of the Department of Public Safety.

12. A licensed health care provider who specializes in treating substance use disorders and who has at least five years of experience.
13. One university faculty member from each university under the jurisdiction of the Arizona Board of Regents who has an academic appointment in the chemistry department or another related analytical lab testing area to function as independent subject matter experts.
14. A representative of a laboratory that conducts proficiency testing for laboratories in this state.

1.3 Record of Business

The Council prepared agendas and kept a record of each meeting through complete meeting recordings in compliance with Arizona's Open Meeting Law (A.R.S. Title 38, Chapter 3, Article 3.1). A [Council website](#)¹ was developed to serve as a repository for all information reviewed, presented, and discussed. Agendas and meeting recordings are included on the Council website. Four meetings were held in 2022 - one each in August, September, November, and December. A fifth meeting was scheduled for October 2022, but quorum was not met.

¹ "ADHS - Medical Marijuana - Home."
<https://www.azdhs.gov/licensing/medical-marijuana/index.php#testing-advisory-council>. Accessed 4 Nov. 2022.

2.0 Council Recommendations

2.1 Removal of Analytes from the Testing Panel

The Council recommends the following analytes should be removed from the required testing panel:

- Pesticides
 - Acequinocyl
- Solvents
 - Propane

2.2 Other Recommendations

- The Council recommends adding clear sampling protocols to be established and adopted to ensure consumer safety amongst a batch. The only way to ensure the sample being submitted without bias is to have an independent sampler (i.e., from the testing laboratory or third-party sampler).
- The Council recommends all testing laboratories report any failing test result for a mandated test to ADHS.
- The Council recommends amending and/or adding the following definitions:
 - “Batch” means, when referring to cultivated medical marijuana, a specific amount of a particular lot of medical marijuana that is uniform in strain, grown from one or more seeds or cuttings that are planted, cultivated utilizing the same pesticides and other agricultural chemicals and harvested at the same time.
 - “Form” means the matrix of marijuana classified into categories of marijuana, concentrate, edible, and topicals.
 - “Topical” means any product containing parts of the cannabis plant that is intended for application to the body’s surface including, but not limited to, lotions, ointments, salves, gels, or cream that are not intended for ingestion, inhalation, or insertion by humans or animals.

3.0 Testing-Related Deficiencies and Remediation*

3.1 *Medical Marijuana Dispensaries and Marijuana Establishments*

Between January 1, 2022 and December 31, 2022, a total of 91 testing-related statements of deficiency comprising 294 citations were issued to 87 licensees (37 medical marijuana dispensaries and 50 marijuana establishments). Plans of correction were submitted to and accepted by ADHS for each of the statements of Deficiency and four inspections resulted in enforcement and civil money penalties. Appendix 2 provides a deidentified listing of the dispensary and establishment testing-related statements of deficiency and remediation.* As requested by the Council during the August 2022 meeting, Appendix 3 provides the five most common citations issued to dispensaries. Appendix 4 provides the five most common citations issued to establishments.

3.2 *Independent Third-Party Laboratories and Testing Facilities*

Between January 1, 2022 and December 31, 2022, a total of 50 testing-related reports of finding comprising 1,545 violations were issued to 22 independent third-party laboratories and testing facilities. Remediation actions included:

- 24 corrective action plans submitted and accepted by ADHS
- 3 consent agreement for withdrawal of applications for testing
- 1 notice of intent to revoke a laboratory registration certificate was issued
- 8 notices of intent to assess civil money penalties issued
- 6 ADHS actions still in progress.

Appendix 4 provides a deidentified listing of laboratory and testing facility inspection reports and corrective actions.* Appendix 5 provides the five most common violations issued to the independent third-party laboratories.

***The Council voted to authorize ADHS to update these numbers through December 31, 2022, before this Report is published in its final form.**

Appendix 1 - Council Roster

The Medical Marijuana Testing Advisory Council, established pursuant to A.R.S. § 36-2812, is comprised of the following individuals:

Council Member	Council Position
Steven Cottrell	Designee of a medical marijuana trade association (A.R.S. § 36-2821(A)(3))
Joe DeMenna	Registered qualifying patient (A.R.S. § 36-2821(A)(9))
Vince Figarelli	Representative of the Department of Public Safety (A.R.S. § 36-2821(A)(11))
Vacant	Licensed healthcare provider specializing in treating substance use disorders (A.R.S. § 36-2821(A)(12))
Ryan Treacy	Designee of a statewide nonprofit cannabis testing association (A.R.S. § 36-2821(A)(2))
Tabitha Hauer	Owner of an Arizona-based cannabis testing laboratory (A.R.S. § 36-2821(A)(7))
Andrew Provencio	Representative of an Arizona-based nonprofit medical marijuana dispensary primarily focused on producing medical marijuana edibles (A.R.S. § 36-2821(A)(6))
Ann Torres (for August meeting) Ryan Hurley (for all subsequent meetings)	Designee of a statewide nonprofit dispensary association (A.R.S. § 36-2821(A)(1))
Hope Jones	Laboratory scientist with three years experience in cannabis laboratory testing (A.R.S. § 36-2821(A)(8))
Matthew LaScala	Representative of an Arizona-based nonprofit medical marijuana dispensary who is employed to cultivate medical marijuana (A.R.S. § 36-2821(A)(4))
Blake Jay Neri	Registered designated caregiver (A.R.S. § 36-2821(A)(10))
Victor Waddell	ADHS Director's designee

Council Member	Council Position
Murray Stein	Representative of an Arizona-based nonprofit medical marijuana dispensary that produces concentrates (A.R.S. § 36-2821(A)(5))
Zhongguo Xiong	Faculty member from University of Arizona who is an academic appointment in the chemistry department or another related analytical lab testing area to function as an independent subject matter expert (A.R.S. § 36-2821(A)(13))
Maxwell Leung	Faculty member from Arizona State University who is an academic appointment in the chemistry department or another related analytical lab testing area to function as an independent subject matter expert (A.R.S. § 36-2821(A)(13))
Alvin Altamirano	Faculty member from Northern Arizona University who is an academic appointment in the chemistry department or another related analytical lab testing area to function as an independent subject matter expert (A.R.S. § 36-2821(A)(13))
Ty Garber	Representative of a laboratory that conducts proficiency testing for laboratories in Arizona (A.R.S. § 36-2821(A)(14))

Appendix 2 - Testing-Related Deficiencies and Remediation: Dispensaries and Establishments

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Dispensary	D101	1	9	POC submitted	POC accepted
Dispensary	D102	1	1	POC submitted	POC accepted
Dispensary	D103	1	1	Enforcement	Civil Money Penalty
Dispensary	D104	1	5	POC submitted	POC accepted
Dispensary	D105	1	12	Enforcement	Civil Money Penalty
Dispensary	D106	1	1	POC submitted	POC accepted
Dispensary	D107	1	1	POC submitted	POC accepted
Dispensary	D108	1	13	Enforcement	Civil Money Penalty
Dispensary	D109	1	5	POC submitted	POC accepted
Dispensary	D110	1	2	POC submitted	POC accepted
Dispensary	D111	1	12	POC submitted	POC accepted
Dispensary	D112	1	1	POC submitted	POC accepted
Dispensary	D113	1	12	POC submitted	POC accepted
Dispensary	D114	1	5	POC submitted	POC accepted
Dispensary	D115	1	5	POC submitted	POC accepted

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Dispensary	D116	1	1	POC submitted	POC accepted
Dispensary	D117	1	9	POC submitted	POC accepted
Dispensary	D118	1	1	POC submitted	POC accepted
Dispensary	D119	1	12	POC submitted	POC accepted
Dispensary	D120	1	13	POC submitted	POC accepted
Dispensary	D121	1	13	POC submitted	POC accepted
Dispensary	D122	1	5	POC submitted	POC accepted
Dispensary	D123	1	12	POC submitted	POC accepted
Dispensary	D124	1	1	POC submitted	POC accepted
Dispensary	D125	1	2	POC submitted	POC accepted
Dispensary	D126	1	1	POC submitted	POC accepted
Dispensary	D127	1	8	POC submitted	POC accepted
Dispensary	D128	1	3	POC submitted	POC accepted
Dispensary	D129	1	12	POC submitted	POC accepted
Dispensary	D130	1	1	POC submitted	POC accepted
Dispensary	D131	1	1	POC submitted	POC accepted
Dispensary	D132	1	2	POC submitted	POC accepted

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Dispensary	D133	1	1	POC submitted	POC accepted
Dispensary	D134	1	10	POC submitted	POC accepted
Dispensary	D135	1	6	POC submitted	POC accepted
Dispensary	D136	1	1	POC submitted	POC accepted
Dispensary	D137	1	7	POC submitted	POC accepted
Dispensary	D138	1	12	POC submitted	POC accepted
Dispensary	D139	1	7	POC submitted	POC accepted
Establishment	E201	1	2	POC submitted	POC accepted
Establishment	E202	1	1	POC submitted	POC accepted
Establishment	E203	1	1	POC submitted	POC accepted
Establishment	E204	1	1	Enforcement	Civil Money Penalty
Establishment	E205	1	1	POC submitted	POC accepted
Establishment	E206	1	1	POC submitted	POC accepted
Establishment	E207	1	1	POC submitted	POC accepted
Establishment	E208	1	2	POC submitted	POC accepted
Establishment	E209	1	2	POC submitted	POC accepted
Establishment	E210	1	1	POC submitted	POC accepted

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Establishment	E211	1	1	POC submitted	POC accepted
Establishment	E212	1	2	POC submitted	POC accepted
Establishment	E213	1	1	POC submitted	POC accepted
Establishment	E214	1	3	Enforcement	Civil Money Penalty
Establishment	E215	1	1	POC submitted	POC accepted
Establishment	E216	1	1	Enforcement	Civil Money Penalty
Establishment	E217	1	2	POC submitted	POC accepted
Establishment	E218	1	5	POC submitted	POC accepted
Establishment	E219	2	1	POC submitted	POC accepted
Establishment	E220	1	1	POC submitted	POC accepted
Establishment	E221	1	2	POC submitted	POC accepted
Establishment	E222	1	1	POC submitted	POC accepted
Establishment	E223	1	1	POC submitted	POC accepted
Establishment	E224	1	1	POC submitted	POC accepted
Establishment	E225	1	4	POC submitted	POC accepted
Establishment	E226	1	2	POC submitted	POC accepted
Establishment	E227	1	2	POC submitted	POC accepted

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Establishment	E228	1	1	POC submitted	POC accepted
Establishment	E229	1	1	POC submitted	POC accepted
Establishment	E230	1	2	POC submitted	POC accepted
Establishment	E231	1	2	POC submitted	POC accepted
Establishment	E232	1	2	POC submitted	POC accepted
Establishment	E233	1	3	POC submitted	POC accepted
Establishment	E234	1	1	POC submitted	POC accepted
Establishment	E235	1	1	POC submitted	POC accepted
Establishment	E236	1	2	POC submitted	POC accepted
Establishment	E237	1	1	POC submitted	POC accepted
Establishment	E238	1	1	POC submitted	POC accepted
Establishment	E239	1	1	POC submitted	POC accepted
Establishment	E240	1	1	POC submitted	POC accepted
Establishment	E241	1	1	POC submitted	POC accepted
Establishment	E242	1	1	POC submitted	POC accepted
Establishment	E243	1	2	POC submitted	POC accepted

License Type	License	Number of SODs Relating to Testing	Number of Citations for Each SOD Relating to Testing	Remediation Efforts	Resolution of Each SOD
Establishment	E244	1	1	POC submitted	POC accepted
Establishment	E245	1	2	POC submitted	POC accepted
Establishment	E246	1	1	POC submitted	POC accepted
Establishment	E247	1	1	POC submitted	POC accepted
Establishment	E248	1	2	POC submitted	POC accepted
Establishment	E249	1	1	POC submitted	POC accepted
Establishment	E250	1	1	POC submitted	POC accepted
Establishment	E251	1	2	POC submitted	POC accepted
Establishment	E252	1	1	POC submitted	POC accepted
Establishment	E253	1	3	POC submitted	POC accepted
Establishment	E254	1	2	POC submitted	POC accepted
Establishment	E255	1	3	POC submitted	POC accepted
Establishment	E256	2	2,2	POC submitted	POC accepted
Light gray shading indicates the license had more than one SOD with citations relating to testing.					
The number of citations for each SOD is separated by a comma.					

Appendix 3 - Most Common Testing-Related Deficiencies for Dispensaries

Citation #	Citation Text
A.A.C. R9-17-310(A)(2)(d)(iii)(4)	A. A dispensary shall: 2. Develop, document, and implement policies and procedures regarding: d. Laboratory testing, including: iii. The process for collecting samples of medical marijuana or a marijuana product for laboratory testing, including: (4) The method for documenting chain of custody for the sample.
A.A.C. R9-17-310(A)(2)(d)(iii)(5)	A. A dispensary shall: 2. Develop, document, and implement policies and procedures regarding: d. Laboratory testing, including: iii. The process for collecting samples of medical marijuana or a marijuana product for laboratory testing, including: (5) Methods to deter tampering with the sample and to determine whether tampering has occurred.
A.A.C. R9-17-310(A)(2)(d)(iv)	A. A dispensary shall: 2. Develop, document, and implement policies and procedures regarding: d. Laboratory testing, including: iv. The process for submitting a sample of medical marijuana or a marijuana product to a laboratory agent or laboratory for testing.
A.A.C. R9-17-310(A)(2)(d)(v)	A. A dispensary shall: 2. Develop, document, and implement policies and procedures regarding: d. Laboratory testing, including: v. The process for requesting retesting of the remaining portion of a sample of medical marijuana or a marijuana product.
A.A.C. R9-17-310(A)(2)(e)(ii)	A. A dispensary shall: 2. Develop, document, and implement policies and procedures regarding: e. Remediation, including: ii. The process by which each type of medical marijuana or marijuana product is remediated, including the methods for remediation and subsequent retesting.

Appendix 4 - Most Common Testing-Related Deficiencies for Establishments

Citation #	Citation Text
A.A.C. R9-18-311(A)(1)	A. Before offering a batch of marijuana or of a marijuana product for sale or otherwise transferring marijuana or a marijuana product to a consumer, a marijuana establishment shall ensure that: 1. Except as provided in subsection (A)(2), each batch of marijuana is tested in compliance with requirements in R9-18-408 and Table 3.1.
A.A.C. R9-18-310(A)(2)(e)(ii)	A. A marijuana establishment shall ensure that marijuana or a marijuana product provided by the marijuana establishment's retail site to a consumer: 2. Is labeled with: e. In compliance with Table 3.1, the potency of the marijuana or marijuana product, based on the results of testing by a marijuana testing facility, including the number of milligrams per designated unit or percentage of: ii. Total cannabidiol, reported according to R9-18-408(F)(2)(b).
A.A.C. R9-18-308(A)(2)(c)(v)(2)	A. A marijuana establishment shall: 2. Develop, document, and implement policies and procedures regarding: c. Inventory control, including: v. Either: (2) Allowing a marijuana facility agent associated with a marijuana testing facility access to marijuana or marijuana product to collect samples.
A.A.C. R9-18-308(A)(2)(c)(v)(1)	A. A marijuana establishment shall: 2. Develop, document, and implement policies and procedures regarding: c. Inventory control, including: v. Either: (1) Providing samples of marijuana or marijuana products to a marijuana testing facility for testing.
A.A.C. R9-18-310(A)(2)(e)(i)	A. A marijuana establishment shall ensure that marijuana or a marijuana product provided by the marijuana establishment's retail site to a consumer: 2. Is labeled with: e. In compliance with Table 3.1, the potency of the marijuana or marijuana product, based on the results of testing by a marijuana testing facility, including the number of milligrams per designated unit or percentage of: i. Total tetrahydrocannabinol, reported according to R9-18-408(F)(2)(a).

Appendix 5 - Testing-Related Deficiencies and Remediation: Laboratories and Testing Facilities

Lab #	Inspection Notes Sent	Status Update Sent	Report of Findings	# of Violations	Corrective Action Plan (CAP)	Additional Information Request	Additional Information Received	ADHS or Lab Action
1	NA	NA	Yes	6	Yes	NA	NA	CAP Accepted
2	NA	NA	Yes	13	Yes	Yes	Yes	LRC Issued
3	Yes	Yes	Yes	60	Yes	Yes	Yes	Consent Agreement CMPs Paid
	NA	NA	Yes	26	Yes	NA	NA	CMPs Paid
4	NA	NA	Yes	49	Yes	NA	NA	LRC Issued
	NA	NA	Yes	16	Yes	Yes	Yes	CAP Accepted
5	Yes	NA	Yes	61	Yes	NA	NA	Consent Agreement CMPs Paid
	Yes	NA	Yes	36	Yes	NA	NA	CMPs Paid
6	NA	NA	Yes	6	NA	NA	NA	Application Withdrawn
	NA	NA	Yes	6	Yes	NA	NA	CAP Accepted
7	Yes	Yes	Yes	99	Yes	NA	NA	Consent Agreement Forfeit LRC
	NA	NA	Yes	9	Yes	NA	NA	
	NA	NA	Yes	1	Yes	NA	NA	
8	NA	NA	Yes	29	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	22	Yes	Yes	Yes	Pending CAP
9	NA	NA	Yes	16	Yes	NA	NA	CAP Accepted
10	NA	NA	Yes	10	Yes	NA	NA	LRC Issued
	NA	NA	Yes	82	Yes	Yes	Yes	CAP Accepted
11	NA	NA	Yes	76	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	76	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	0	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	9	Yes	NA	NA	CAP Accepted
12	Yes	NA	Yes	48	Yes	Yes	Yes	Consent Agreement CMPs Paid
	NA	NA	Yes	1	Yes	NA	NA	
	NA	NA	Yes	3	Yes	NA	NA	
13	NA	NA	Yes	21	Yes	Yes	NA	Application Withdrawn

Lab #	Inspection Notes Sent	Status Update Sent	Report of Findings	# of Violations	Corrective Action Plan (CAP)	Additional Information Request	Additional Information Received	ADHS or Lab Action
14	NA	NA	Yes	74	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	0	NA	NA	NA	No CAP Required
	NA	NA	Yes	4	Yes	NA	NA	CAP Accepted
15	NA	NA	Yes	47	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	12	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	10	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	1	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	18	Yes	NA	NA	CAP Accepted
16	Yes	Yes	Yes	84	Yes	Yes	Yes	Consent Agreement CMPs Paid
	NA	NA	Yes	17	Yes	NA	NA	CAP Accepted
17	Yes	Yes	Yes	125	Yes	Yes	Yes	Consent Agreement CMPs Paid
	NA	NA	Yes	6	Yes	NA	NA	CAP Accepted
18	Yes	Yes	Yes	45	Yes	Yes	Yes	Consent Agreement CMPs Paid
	NA	NA	Yes	0	NA	NA	NA	CAP Accepted
	NA	NA	Yes	1	Yes	NA	NA	CAP Accepted
19	NA	NA	Yes	29	Yes	NA	NA	LRC Issued
20	NA	NA	Yes	5	Yes			CAP Pending
21	NA	NA	Yes	89	Yes	NA	NA	CAP accepted
	NA	NA	Yes	11	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	2	Yes	NA	NA	CAP Accepted
22	Yes	NA	Yes	154	NA	NA	NA	Application Withdrawn
	NA	NA	Yes	18	Yes	NA	NA	CAP Accepted
	NA	NA	Yes	8	Yes	Yes	Yes	CAP Accepted
	NA	NA	Yes	4	Yes	Yes	Yes	CAP Accepted

LRC = Laboratory Registration Certificate
 NOI = Notice of Intent
 CMP = Civil Money Penalty
 CAP = Corrective Action Plan

Note: No Marijuana Testing Facilities (Adult Use) applied during the time period.

Appendix 6 - Most Common Testing-Related Deficiencies for Laboratories and Testing Facilities

MMTAC Report - Most Common Lab Testing Deficiencies - Medical Marijuana Testing Laboratories	
Citation #	Citation Text
Chapter 17 - Medical Marijuana Program	
A.A.C. R9-17-404.05(A)	An owner holding a laboratory registration certificate or applicant shall ensure that the analytical data produced at the owner's or applicant's laboratory are of known and acceptable precision and accuracy, as prescribed by the method criteria for each analyte in R9-17-404.03 or R9-17-404.04, and are scientifically valid and defensible.
A.A.C. R9-17-404.05(D)(3)	Maintain and require each laboratory agent performing testing on medical marijuana or a marijuana product to comply with a complete and current standard operating procedure that meets the requirements for each method, as specified in R9-17-404.03 or R9-17-404.04, which shall include at least: a. A description of all procedures to be followed when the method is performed; b. A list of the concentrations for calibration standards, check standards, and spikes; Unofficial version of the Rules in 9 A.A.C. 17, effective September 7, 2021 Page 114 c. Requirements for instrumental conditions and set up; d. A requirement for frequency of calibration; e. The quantitative methods to be used to
A.A.C. R9-17-404.04(B)(2)	A technical laboratory director shall ensure that all instruments and equipment used for testing medical marijuana or a marijuana product for microbial contaminants are ... Monitored and maintained according to AOAC - Guidelines for Laboratories Performing Microbiological and Chemical Analyses of Food, Dietary Supplements, and Pharmaceuticals, 6.3: Facilities and Environmental Conditions, 6.4: Equipment, 7.7: Ensuring the Validity of Results, and Appendix A: Equipment, August 2018, which is incorporated by reference, includes no future editions or amendments, Unofficial version of the Rules in 9 A.A.C. 17, effective September 7, 2021 Page 110 and is available at https://www.aoac.org/aoac
A.A.C. R9-17-404(5)(c)(i)	Develop, document, and implement policies and procedures regarding ... Inventory control, including ... Tracking.
A.A.C. R9-17-404.02(A)(1)	At least once in each 12-month period, and more often if requested by the Department, a technical laboratory director shall have at least one laboratory agent, selected according to policies and procedures, participate in proficiency testing provided by the Department or a proficiency testing service that ... Includes at least one proficiency testing sample for each parameter and analyte for which the laboratory has been approved or is requesting approval and for which