Toolkit · Build out Plan Updated November 22, 2026

Security Plan Template

The security requirements in the Cannabis Control Act and the CCA draft rules, each cited: storage and quantity limits, locks, keys and codes, the alarm system, lighting, access control and visitors, outdoor cultivation, required written policies, and the reportable events with their deadlines.

Who needs it: Every marijuana establishment: cultivation, processing, retail, microbusiness, transporter, delivery, testing; Regulated hemp product retail facilities (the draft registration rule asks for security details; the draft reportable-events rule names them).

Rule basis: Code of Virginia §§ 4.1-606 B 1, 4.1-703 D, 4.1-800 C and E, 4.1-801 B, 4.1-802 F, 4.1-803 C, 4.1-804 B, 4.1-806 G, 4.1-810 B 3 e, 4.1-1000 F 3, 4.1-1106.1; HB 30 enactment 17; draft rules 3VAC10-30-100, -130, -135, -180, -200, 3VAC10-40-20, -30, -35, -80, -120, -140, -150, 3VAC10-80-20 (proposed).

Citations starting **3VAC10** are the Cannabis Control Authority's draft proposed adult-use regulations dated September 9, 2026: **proposed, not final, may change**. Citations starting **§ 4.1** are the Code of Virginia as amended by HB 30, Chapter 1 (2026). The section "What other states required or scored" is reference only and is not Virginia law.

We report what the law says. Not legal advice; see the disclaimer.

The Cannabis Control Act requires every area where a licensee grows, processes, sells, tests or stores marijuana to meet the security standards in the Board's regulations, and the CCA's draft rules set those standards: storage limits, locks, alarms, lighting, access control, visitor procedures, written policies and incident reporting. A security plan is named as an application item in both the statute and the draft rules. Citations to 3VAC10 are to the CCA's draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption).

Camera requirements are listed in the Video surveillance SOP. Vehicle security is in the Transport and delivery SOP.

What Virginia requires

Statutory baseline

- All areas of a cultivation facility's licensed premises where marijuana is cultivated, labeled, packaged or stored "shall meet all sanitary and security standards specified in regulations adopted by the Board" (Code of Virginia § 4.1-800 E).
- The same standard applies to processing areas (§ 4.1-801 B), retail areas where product is sold or stored (§ 4.1-802 F), all microbusiness premises (§ 4.1-803 C), transporter storage areas (§ 4.1-804 B) and testing facility areas where product is tested or stored (§ 4.1-806 G).
- The Board must adopt regulations for outdoor cultivation that include "security requirements to include lighting, physical security, and alarm requirements," and those requirements may not prohibit cultivation outdoors or in a greenhouse (§ 4.1-606 B 1). HB 30 directs the Board to adopt the outdoor growth regulations by Feb. 1, 2027 (HB 30, 2026 Sp. Sess. I, c. 1, enactment 17).
- Cultivation in a secure agricultural greenhouse counts as indoor cultivation if the greenhouse is surrounded by a privacy fence no less than eight feet tall and is subject to monitored ingress and egress (§ 4.1-800 C).
- The Board must refuse a license if the place is "so constructed, arranged, or illuminated" that law-enforcement officers and Board agents are prevented from ready access to and reasonable observation of any room or area where marijuana is to be sold (§ 4.1-810 B 3 e).
- Within 18 months of selection for preliminary approval, an applicant provides, if applicable, an updated description of the location and "an updated security plan" (§ 4.1-1000 F 3).

- The Board and its special agents have free access during reasonable hours to the premises of every licensee to examine the place and all records (§ 4.1-703 D).
- No person may sell marijuana, or market or label products as marijuana, without a Board-issued decal prominently displayed; the civil penalty is $10,000 per day (§ 4.1-1106.1 A).

Application and change rules (draft)

- The notice of open applications must list criteria that include "the applicant's ability to maintain adequate control against the diversion, theft, and loss" of marijuana (3VAC10-30-100 A 2 b, draft).
- Before a license issues, the applicant provides "details regarding the applicant's plans for security to maintain adequate control against the diversion, theft, or loss of marijuana products" (3VAC10-30-130 A 6, draft).
- A regulated hemp product retail facility applicant provides the same kind of security details for regulated hemp products (3VAC10-30-135 A 4, draft).
- Changing the location, structure or "approved security system" of an existing marijuana establishment requires an application to the Board and the required fee (3VAC10-30-180 C, draft); the same applies to a regulated hemp product retail facility (3VAC10-30-200 F, draft).

Storage and quantity

- No establishment may cultivate marijuana or keep marijuana products "in excess of the quantity required for normal, efficient operation" (3VAC10-40-140 A, draft).
- All marijuana and marijuana products are kept in a secure area accessible only by the minimum number of authorized employees essential for efficient operation (3VAC10-40-140 B 1, draft).
- All cut parts of plants and marijuana products are stored in an approved safe or approved vault, and no marijuana products are sold while the establishment is closed (3VAC10-40-140 B 2, draft).
- Approved safes, vaults and production, cultivation, harvesting, processing, manufacturing and storage areas stay locked or protected from entry except for the time needed to remove or replace product (3VAC10-40-140 B 3, draft).

- Storage areas provide adequate lighting, ventilation, sanitation, space, equipment and security conditions (3VAC10-40-80 A 1, draft).
- Items are returned to their secure location immediately after production, transfer or analysis, or at the end of the scheduled business day (3VAC10-40-80 A 6 and C, draft).
- If a production process cannot be completed by the end of a working day, the pharmacist, responsible party or designated supervisor securely locks the processing area or the tanks, vessels, bins or bulk containers inside an area or building that affords adequate security (3VAC10-40-80 B, draft).

Building, locks, keys and codes

- All primary and secondary points of entry are secured, "including maintaining commercial-grade, non-residential door locks" and securing secondary entrances including windows, roofs and ventilation systems (3VAC10-40-140 B 4, draft).
- Access to keys or codes for safes, vaults and equipment or areas in the dispensing or sales area is restricted to employees of the establishment (3VAC10-40-140 B 5, draft).
- Access to keys or codes for safes, vaults and secured areas is restricted to the responsible party and those the responsible party authorizes (3VAC10-40-140 B 6, draft).
- Keys may not be left in the locks or otherwise accessible to persons not authorized by the PIC or responsible party (3VAC10-40-140 B 7, draft).
- The PIC or responsible party may designate employees to unlock a secured area to perform job duties, but only during hours of operation, and "at no time shall these employees have access to the security system" (3VAC10-40-140 C, draft).
- The outside perimeter of the premises is kept well lit (3VAC10-40-140 E, draft).

Alarm system

- The establishment has "an adequate security system to prevent and detect diversion, theft, or loss," with a failure notification system and a backup alarm system able to remain operational during a power outage, installed and operated to accepted alarm industry standards (3VAC10-40-140 D, draft).

- The system includes a sound, microwave, photoelectric, ultrasonic or other generally accepted device (3VAC10-40-140 D 1, draft).
- The system is monitored to accepted industry standards, maintained in operating order, has an auxiliary power source, and can send an alarm signal to the monitoring entity when breached if the communication line is not operational (3VAC10-40-140 D 2, draft).
- The system fully protects the entire facility and can detect any failure in the system when activated (3VAC10-40-140 D 3, draft).
- The system includes a duress alarm, a panic alarm and an automatic voice dialer (3VAC10-40-140 D 4, draft).
- Access to the alarm system is restricted to authorized employees, and the system is activated whenever the establishment is closed for business (3VAC10-40-140 D 5, draft).
- In areas designated for authorized activities, alarm access is restricted to the responsible party and those the responsible party authorizes (3VAC10-40-140 D 6, draft).
- All security equipment and recordings are kept in a secure location to prevent theft, loss, destruction or alteration; all security equipment is maintained in good working order and "tested at least every six months" (3VAC10-40-140 H, draft).

Access control, compartments and supervision

- The PIC, pharmacist, responsible party or designated supervisor on duty restricts access to persons whose job requires it (for only as long as necessary) and to patients, consumers and related persons, who are not permitted behind the service counter or in secured areas where product is stored (3VAC10-40-20 B, draft).
- All employees inside the establishment wear name tags or similar identification showing their position (3VAC10-40-20 C, draft).
- All areas of the facility are compartmentalized by function, with access between compartments restricted (3VAC10-40-80 A 4, draft).
- Marijuana is accessible only to the minimum number of specifically authorized employees essential for efficient operation (3VAC10-40-80 A 5, draft).

- When a pharmacist, responsible party or designated supervisor is not on the premises directly supervising the dispensing or sales area, that area may not be open, no one may be in it unless all product is in a vault or similar container to which only those persons have access controls, and the area is closed and secured (3VAC10-40-30 B, draft).
- Employee access to secured areas is permitted only when a pharmacist, responsible party or designated supervisor is on the premises (3VAC10-40-30 C, draft).
- No one other than an establishment employee is allowed behind the service counter or in other secured areas, except as the section provides (3VAC10-40-30 E, draft).
- Testing facility staff may enter solely to identify and collect test samples (3VAC10-40-30 F, draft). Board agents, local law enforcement and other government officials may enter any area necessary to perform their duties (3VAC10-40-30 L, draft).
- Retail and dispensing establishments limit access to the dispensing area or sales floor to customers at least 21 years old, qualified patients, registered agents, or the parent or legal guardian of a minor or vulnerable-adult patient (3VAC10-40-140 L, draft).
- The responsible party ensures compliance with all security measures and that all requirements for physical security of product on the premises are met (3VAC10-40-120 D and E 3, draft).

Visitors and contractors

- An establishment submits a written request to the CCA for entry to secured areas by parties of more than five persons (3VAC10-40-30 G, draft).
- Employees of contracted businesses (the draft's examples: security, cleaning, electrical, plumbing) may be on the premises to perform their duties without requesting Board authorization; the draft says the establishment "should apply" the visitor access requirements to them (3VAC10-40-30 H, draft).
- Every person authorized to enter secured areas obtains a visitor identification badge from an employee before entering (3VAC10-40-30 I, draft).

- An employee escorts and monitors an authorized visitor at all times (3VAC10-40-30 I 1, draft).
- The badge stays visible while the visitor is inside and is returned to an employee on exit (3VAC10-40-30 I 2, draft).
- All visitors log in and out; the visitor log includes the name, date, time and purpose of the visit and is available to the Board (3VAC10-40-30 I 3, draft).
- If an emergency requires a visitor's presence and makes prior CCA authorization impractical, the establishment gives written notice to the Board as soon as practicable after the onset of the emergency, with the visitor's name and company affiliation, the purpose, and the date and time of the visit, and monitors and logs the visit (3VAC10-40-30 I 4, draft).

Outdoor cultivation

- Licensees with outdoor cultivation implement security measures in addition to those required of all licensees, including (1) fencing, building structure or physical obstacles to prevent unauthorized entry to any cultivation area; (2) motion-activated flood lights, which may face away from the plant canopy; and (3) video surveillance with an unobscured view of the cultivation area (3VAC10-40-140 G, draft).

Required written policies

- Written policies and procedures for secure operations that restrict movement between compartments, provide different colored identification cards for employees based on the compartment to which they are assigned, and document the chain of custody of all marijuana (3VAC10-40-80 D, draft).
- Written policies and procedures for authorized activities, security, storage and inventory, including "methods for identifying, recording, and reporting diversion, theft, or loss" and for correcting errors in inventories (3VAC10-40-80 F, draft).
- A process for "preparing for, protecting against, and handling any crises that affect the security or operation of any facility in the event of labor strike, fire, flood, or other natural disaster, or other situations of local, state, or national emergency" (3VAC10-40-80 F 2, draft).

- A written alcohol-free, drug-free and smoke-free workplace policy available to the Board on request (3VAC10-40-20 E, draft).
- The CCA-issued decal displayed outside and within the facility at all times (3VAC10-40-20 F, draft).
- A closure during normal hours of operation lasting longer than two business days requires immediate notice to the Board (3VAC10-40-20 D, draft).

Regulated hemp product retail facilities (draft)

- When the owner, responsible party or designated supervisor is not on the premises directly supervising the sales area, the sales area may not be open, no one may be in it unless all regulated hemp products are in a vault or similar container to which only those persons have access controls, and the area is closed and secured (3VAC10-40-35 B, draft).
- Employee access to secured areas is permitted only when the owner, responsible party or designated supervisor is on the premises (3VAC10-40-35 C, draft).
- No one other than an employee is allowed behind the service counter or in areas where regulated hemp products are stored, except government officials performing their duties (3VAC10-40-35 D and F, draft).

Additional safeguards and enforcement

- The Board may require any other safeguard it determines necessary after a physical site inspection (3VAC10-40-140 J, draft), and additional safeguards after any diversion, theft or loss (3VAC10-40-140 K, draft).
- Failure to maintain effective controls against diversion, theft or loss is a ground for the Board to suspend, revoke or refuse to renew a license (3VAC10-80-20 3, draft).

Reportable events (3VAC10-40-150, draft; applies to marijuana establishments and regulated hemp product retail facilities)

Event	Who must be told	Deadline	Cite
Diversion, theft, loss, or discrepancies identified during inventory	Appropriate law-enforcement authorities and the Board	Immediately upon becoming aware	3VAC10-40-150 A 1
Unauthorized destruction of any marijuana or regulated hemp products	Law enforcement and the Board	Immediately	3VAC10-40-150 A 2
Any loss or unauthorized alteration of records related to regulated products or qualifying patients	Law enforcement and the Board	Immediately	3VAC10-40-150 A 3
Signed statement for any event in the three rows above, detailing the circumstances, an accurate inventory of the quantity and registered product names diverted, stolen, lost, destroyed or damaged, and confirmation that local law enforcement was notified	The Board	No later than 24 hours after discovery	3VAC10-40-150 B
Alarm activation or other event requiring a response by public safety personnel	The Board	Next business day, then written notification within 10 business days	3VAC10-40-150 C 1
A breach of security	The Board	Next business day, then written notification within 10 business days	3VAC10-40-150 C 2

Event	Who must be told	Deadline	Cite
Failure of the security alarm system due to loss of electrical support or mechanical malfunction expected to last longer than eight hours	The Board	Next business day, then written notification within 10 business days	3VAC10-40-150 C 3
Written notification for the three rows above detailing the circumstances and identifying corrective measures taken, if any	The Board	No later than 10 business days	3VAC10-40-150 D
An employee convicted of a felony	The Board	Immediately	3VAC10-40-150 E
Awareness or reasonable suspicion of a violation of the practitioner rules in 3VAC10-30-30 or -40	The Board	Immediately	3VAC10-40-150 F

Records and forms the rules name

Visitor log (fields exactly as listed in 3VAC10-40-30 I 3, draft; visitors log in and out)

Name	Date	Time in	Time out	Purpose of visit

Emergency visitor notice to the Board (contents listed in 3VAC10-40-30 I 4, draft)

- Visitor name:
- Company affiliation:
- Purpose of the visit:
- Date and time of the visit:

Signed statement for a 3VAC10-40-150 A event (contents listed in 3VAC10-40-150 B, draft)

- Circumstances of the event:
- Accurate inventory of the quantity and registered product names diverted, stolen, lost, destroyed or damaged:
- Confirmation that local law enforcement was notified:
- Signature:

Written follow-up for a 3VAC10-40-150 C event (contents listed in 3VAC10-40-150 D, draft)

- Circumstances of the event:
- Corrective measures taken, if any:

Six-month security equipment test record (the testing interval is in 3VAC10-40-140 H, draft; the draft does not list record fields)

Equipment	Date tested

What the law does not say

- The draft rules require “commercial-grade, non-residential door locks” and an “approved safe or approved vault” but do not set a lock grade, a safe or vault rating, or say who approves a safe or vault (3VAC10-40-140 B 2 and 4, draft).
- The draft rules do not require on-site security guards and do not set a cash-handling standard.
- The draft rules do not list the fields of the six-month equipment test record.

What other states required or scored

Not required in Virginia. Shown so applicants can see what other regulators asked for.

Illinois (410 ILCS 705; IDFPR dispensary application)

- Illinois scored "Security and Recordkeeping" at 65 of the 250 points available on a conditional adult-use dispensing organization application (410 ILCS 705/15-30(c)(2)).
- The scored security plan had to account for "the prevention of the theft or diversion of cannabis," show safety procedures for agents and purchasers, and cover safe delivery and storage of cannabis and currency (410 ILCS 705/15-30(c)(2)(A)).
- The plan also had to name the private security contractor, licensed under 225 ILCS 447/10-5, that the dispensary would contract with (410 ILCS 705/15-30(c)(2)(C)).
- The application form capped Exhibit H (Security Plan) at 50 pages, not counting a copy of the security contractor contract, and required the plan to cover safe delivery and storage of "cannabis currency" (IDFPR Conditional Adult Use Dispensing Organization License Application, Exhibit H).
- Exhibit J (Proposed Floor Plan) had to show the location of each video camera, each panic button and glass break, restricted access areas, and the location and dimensions of all safes or vaults (IDFPR Application, Exhibit J items 9-19).

Massachusetts (935 CMR 500)

- Massachusetts requires a perimeter alarm on all building entry and exit points and perimeter windows, a duress, panic or holdup alarm connected to local public safety or law enforcement, and a failure notification that alerts designated employees within five minutes (935 CMR 500.110(5)(a)1.-3.).
- The security system must stay operational during a power outage for at least four hours (935 CMR 500.110(5)(a)8.).

- A back-up alarm system with all the capabilities of the primary system is required, supplied by a company other than the primary system supplier, unless alternate safeguards are shown (935 CMR 500.110(5)(c)).
- Security equipment must be inspected and tested at intervals not exceeding 30 calendar days (935 CMR 500.110(5)(f)).
- Limited Access Areas must carry a sign of at least 12" x 12" reading "Do Not Enter - Limited Access Area - Access Limited to Authorized Personnel Only," and visitors must be badged, escorted and logged in and out (935 CMR 500.110(4)(a), (e)).
- The floor plan and security plan are shared with law enforcement, police and fire departments, and the shared plan includes the security system location, a schematic of security zones, and the alarm and monitoring company names (935 CMR 500.110(1)(p)-(q), (6)(f)).
- Cash handling requires a safe or vault separate from retail areas used only for cash, and an armored transport provider licensed under M.G.L. c. 147, § 25, unless an alternative is approved (935 CMR 500.110(7)(a)).
- Approved alternatives for cash transport include a locked bag, an unmarked vehicle, two registered agents in the vehicle, real-time GPS tracking and two-way communications (935 CMR 500.110(7)(b)).

New York (9 NYCRR Part 125)

- New York requires a security plan that describes measures to prevent unauthorized access, deter theft, prevent loitering, lock all perimeter doors and windows, and provide for safe cash storage and transport to financial institutions (9 NYCRR 125.3(a)(2)).
- The perimeter alarm must communicate with an internal designee and a third-party commercial central monitoring station (9 NYCRR 125.3(c)(1)).
- Alarms and video must remain operational during a power outage for at least eight hours (9 NYCRR 125.3(c)(4)).
- Security equipment is tested at intervals not exceeding 30 calendar days, and test records are kept for five years (9 NYCRR 125.3(c)(6)).
- Outdoor cultivation fencing must be metal or similarly secure, at least eight feet high, with securely anchored posts (9 NYCRR 125.3(c)(7)(i)).

- Employee badges must show name, photograph, licensee legal name and license number; the visitor log records name, company, arrival, departure and purpose and is kept five years (9 NYCRR 125.3(d)).
- Security breaches and listed incidents are reported to the Office immediately and in no case more than 24 hours after discovery (9 NYCRR 125.3(e)).

New Jersey (N.J.A.C. 17:30)

- New Jersey requires an alarm system that gives immediate notification to business personnel and State or local police of a breach, alarm or system failure, plus a backup that activates automatically on loss of electrical power (N.J.A.C. 17:30-9.10(b)1).
- Alarm inspections and tests occur at intervals not exceeding 30 days (N.J.A.C. 17:30-9.10(b)5).
- If an alarm failure is expected to last longer than eight hours, the business notifies the Commission and either uses approved alternative measures or closes the affected premises (N.J.A.C. 17:30-9.10(b)6).
- Interior and exterior premises are equipped with electronic monitoring, video cameras and panic buttons, and the video system is approved by the Commission before license issuance (N.J.A.C. 17:30-9.10(b)9).
- Law enforcement and neighbors within 100 feet receive the name and phone number of a staff contact for reporting problems (N.J.A.C. 17:30-9.10(b)11).
- Alarm and video systems are monitored 24 hours a day, seven days a week, and monitoring may be off-site (N.J.A.C. 17:30-9.10(c)).
- The annual license application includes “a safety and security plan that conforms with N.J.A.C. 17:30-9.10” (N.J.A.C. 17:30-7.10(b)17).

Ohio (OAC 1301:18)

- Ohio requires dispensaries to keep written security and surveillance policies and to petition the Division of Cannabis Control before any major modification to security procedures, systems or equipment (OAC 1301:18-8-05(A)).

- The alarm includes access alarms on all entry points and windows, motion detectors, and a silent duress alarm with a code that signals the user is being forced to turn off the system (OAC 1301:18-8-05(B)(2)).
- Security equipment sits in a secure, limited access area reachable only by registered employees with foundational security and surveillance training (OAC 1301:18-8-05(B)(1)).
- Daily records of employee access to secure, limited access areas are required (OAC 1301:18-8-05(B)(6)).
- Equipment is tested at least monthly, failures are reported to the Division, and repair or replacement occurs within 24 hours of identification (OAC 1301:18-8-05(C)).

Maryland (COMAR 14.17)

- Maryland requires a grower's alarm to cover perimeter entry points, rooms that hold cannabis, and on-site and off-site record storage locations (COMAR 14.17.10.02G(1)).
- The alarm must be continuously monitored, detect smoke, fire and power loss, include panic devices, and have auxiliary power for at least 48 hours (COMAR 14.17.10.02G(2)).
- Outdoor cultivation areas are surrounded by fencing and gates with a continuously monitored perimeter alarm and video covering all fencing and gates (COMAR 14.17.10.02C(2)-(4)).
- A standard dispensary must contain a secure inventory room built of concrete or similar material, not adjacent to an exterior wall, with one entrance door fitted with a cipher or chip-activated lock or equivalent (COMAR 14.17.12.02G).

Sources checked 2026-11-22.

- 410 ILCS 705/15-30, Selection criteria for conditional licenses (FindLaw mirror of Illinois Compiled Statutes)
- IDFPR, Conditional Adult Use Dispensing Organization License Application (rev. 10/11/19)

- Cannabis Control Commission, 935 CMR 500.000 Adult Use of Marijuana (effective 09-11-26)
- Office of Cannabis Management, Express Terms adopting Parts 118-125 and 131 (9 NYCRR)
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules
- OAC 1301:18-8-05, Minimum Security and Surveillance Requirements
- COMAR 14.17.10.02, Cannabis Grower Premises
- COMAR 14.17.12.02, Standard Cannabis Dispensary

Sources

- Code of Virginia § 4.1-606 (Regulations of the Board)
- Code of Virginia § 4.1-703 (Records of licensees; inspection)
- Code of Virginia § 4.1-800 (Marijuana cultivation facility license)
- Code of Virginia § 4.1-801 (Marijuana processing facility license)
- Code of Virginia § 4.1-802 (Retail marijuana store license)
- Code of Virginia § 4.1-803 (Microbusiness license)
- Code of Virginia § 4.1-804 (Marijuana transporter license)
- Code of Virginia § 4.1-806 (Marijuana testing facility license)
- Code of Virginia § 4.1-810 (Conditions under which the Board shall or may refuse to grant licenses)
- Code of Virginia § 4.1-1000 (Applications for licenses)
- Code of Virginia § 4.1-1106.1 (Selling without decal; civil penalty)
- HB 30 (2026 Sp. Sess. I, c. 1), Item 4-14 enactment clauses (enactment 17)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-30, 3VAC10-40, 3VAC10-80

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