MINUTES OF THE
IDAHO STATE BOARD OF PHARMACY
AUGUST 21 & 22, 2012

IDAHO STATE CAPITOL – BOISE, IDAHO

This meeting of the Board was held to conduct regular Board business.

Chairman Berk Fraser, R.Ph., called the meeting to order on August 21, 2012 at 9:04 a.m. In attendance were Board members Richard de Blaquiere, Pharm D; Nicole Chopski, Pharm D; Holly Henggeler, Pharm D; Ed Sperry, and Mark Johnston, R.Ph., Executive Director; Nicole McKay, DAG; Kathy Takasugi, DAG; Jan Atkinson, Senior Compliance Officer; Fred Collings, Chief Investigator; Lisa Culley, Compliance Officer; Mike Brown, Compliance Officer; Gina Knittel, Compliance Officer; and Wendy Hatten.

Dr. Chopski motioned to enter executive session, pursuant to Idaho Code 67-2345(1)(a). Dr. Henggeler seconded. Chairman Fraser took roll call, and the vote was unanimous to enter executive session at 9:10 a.m. Mr. Sperry motioned to end executive session. Via unanimous consent, executive session ended at 10:20 a.m.

Mr. Fraser called the meeting back to order after a short break.

The minutes of the May 31, 2012 Board meeting were reviewed. Dr. Henggeler motioned to approve the minutes with minor corrections. Dr. Chopski seconded. The motion passed unanimously.

Ms. McKay presented refresher training regarding possible or perceived conflicts of interest on topics presented at Board meetings and how to properly address such conflicts, such as through disclosure or recusal.

Mr. Johnston presented the Board's financial report for the Board office:

- Regarding fiscal year 2012, the comparison of budget to expenses as of June 30, 2012 showed the Board 10% under budget. This was mainly due to not expending all of the appropriations for operating expenses, specifically for the rules rewrite, PMP interstate data sharing, and scanning projects.
- Regarding fiscal year 2013, the comparison of budget to expenses showed 13% of the year passed and slightly more than 13% spent, due mainly to certain onetime purchases.
- The Board office began a scanning project in July of 2012. In order to complete the project, appropriated money not utilized in fiscal year 2012, was encumbered for use in fiscal year 2013.
- The Board office sold two (2) cars and profit from the sales will go towards the purchase of computers.
- The new licensing system project is still in process and the appropriated funds are projected to be paid out over a three (3) year span.
- Most federal grant funds for the Prescription Monitoring Program (PMP) are still unused, pending federal authorization to use on projects other than interstate data sharing through the PIMIX system, which now appears defunct with the advent of the National

Association of Boards of Pharmacy (NABP)'s Interconnect system, available at no charge. The Board has Idaho state appropriation for a portion of the grant monies for FY 2013, however, the Board must request supplemental appropriation to spend the remaining grant amount in FY 2013, as appropriation was left unspent in prior years, awaiting the federal government's approval of alternative projects, some of which are proposed to be:

- Develop daily automated refreshing in order to provide more accurate data.
- Develop a program for authorized users to alert other pharmacist and prescribers when potential illegalities or opportunities for better health care are identified.
- Develop an online portal for dispensing prescribers to submit dispensing data.
- Develop an online portal for wholesalers to submit certain data.
- Develop an online program to register as an authorized user.
- Create and distribute signs for pharmacies and prescribers to post, indicating their participation in the PMP.
- Create and distribute informative brochures to assist new PMP users.
- Addition of a new T1 line due to anticipated increased usage from interstate data sharing.
- Index payment method codes within the PMP.
- Contract with a web designer to update the website to add interactive capability.
- Contract to visit prescribers in an effort to increase PMP usage and prescriber drug outlet registration.

NABP is building a new PMP system from the ground up. The first five (5) states that assist with such development will be able to utilize the system at no cost. Annual maintenance cost of the new system would be approximately the same as the Board's current annual maintenance costs. Idaho has a potential opportunity to be one of the first 5 states, and the Board was supportive. The Board tentatively decided to spend current appropriated funds on IT projects, and then after receiving supplemental appropriation, spend half on IT projects and the other half on hiring contract workers.

Via telephone conference call Mr. David Sincerbeaux, of the Idaho State Police Forensic Services requested a temporary rule that would schedule certain substances that are collectively referred to as "Spice". Said substances are not currently scheduled according to prior Board and legislative action. Mr. Johnston explained that if the Board approved of such temporary changes and if the Governor signed the temporary rule, the Board would let the rule die in 2013 and propose updating the "spice" language in schedule I in statute. Dr. Chopski motioned to accept proposed language and to submit to the Governor as a temporary rule. Dr. Henggeler seconded. The motion passed unanimously.

David Moore, R.Ph., of Pharmerica, and Mike McGrath, President and Owner of Action Couriers, presented a request to change rule 604, adding language that would allow "long term pharmacies" to store filled prescriptions in an alternate designated area outside of the pharmacy for subsequent after hours pick up by a delivery driver. A waiver to allow such operation until obtaining legislative approval was also presented. Dr. Chopski commented that after contacting several pharmacies that delivered, she thought the operation explained was safer than many alternative methods. Dr. de Blaquiere commented that such an operation was not needed if utilizing better scheduling and potentially additional pharmacist hours to ensure the delivery was conducted directly between the pharmacist and the delivery driver. Mr. Johnston pointed out terminology, language, and location issues with the proposed language, as well as time

constraints with 2013 rule promulgation. After much discussion, Dr. Henggeler motioned to deny the waiver and rule promulgation and place the matter on a future agenda for further discussion. Dr. Chopski seconded. The motion passed unanimously. Dr. Henggeler made an additional motion to have the compliance officers educate pharmacies on the law for now, have Mr. Johnston clarify in the December Newsletter that the depoting of prescriptions in such a room is illegal stating that enforcement will be exercised, and to post the matter to the Board's website. Mr. Sperry seconded. The motion passed unanimously.

Mr. Fraser called the meeting to order after a lunch break.

Ms. Takasugi presented BOP case number 11-727-C, stipulation and consent order in the matter of Debbie Felland, Pharmacy Technician, involving violations of Idaho Code 54-1726(a)(f), and Board rule 184.04. Ms. Felland worked with Mark Coburn, R.Ph. and assisted with and/or participated in the mis-filling of a prescription on July 28, 2011. The stipulation and consent order indicated that Ms. Felland was to pay a two hundred and fifty ($250.00) dollar fine within one hundred and eighty (180) days, and complete four (4) credits of continuing education pertaining to prescription and/or medication error within ninety (90) days. Dr. Chopski motioned to accept the stipulation and order as written. Dr. de Blaquiere seconded. The motion passed unanimously.

Ms. Takasugi presented BOP case number 12-019, stipulation and consent order in the matter of Mark Wright, DDS, involving violations of Idaho Code 37-2734(3), 37-2720, and Board rule 206, for diverting Demerol without a prescription. Dr. Wright is to submit controlled substance administration logs, perpetual inventory logs, controlled substances invoices and DEA forms 222 to Board staff on a bi-monthly basis for two (2) years. Dr. Henggeler motioned to accept the stipulation and order as written. Dr. de Blaquiere seconded. The motion passed unanimously.

Ms. Takasugi presented BOP case number 12-035, stipulation and consent order in the matter of Jason Dalling, Pharm D, involving violations of Idaho Code 37-2722(c), 54-1726(a) and Board rules 184.07, and 184.08, for diverting schedule III and IV drugs from his employer. Dr. Dalling's license and CS registration are conditioned for five (5) years of continuous compliance with the stipulation and order, to include contract compliance with Southworth Associates, administrator of the Board's Pharmacist Recovery Network (PRN), with whom Dr. Dalling volunteered. The Board order includes no fines or suspension. Dr. Chopski motioned to accept the stipulation and order as written. Dr. de Blaquiere seconded. The motion passed unanimously.

Ms. Takasugi presented BOP case number 13-007, stipulation and consent order in the matter of Peter Killian, MD, controlled substance applicant. Mr. Killian admitted on his controlled substance application to having past issues with alcohol. Mr. Killian's CS registration is conditioned to five (5) years of continuous compliance with the Board's stipulation and order that mirrors the Board of Medicine's stipulation and order, to include compliance with his PRN contract. Dr. Henggeler motioned to accept the stipulation and order as written. Dr. de Blaquiere seconded. The motion passed unanimously.

During Inspector Q & A Jan Atkinson, Senior Compliance Officer presented Board rule 262 regarding facilities that take return medications. Ms. Atkinson and the compliance officers requested a rule change to add back the requirement of written protocols and signed agreements to assure compliance with conditions necessary for medications to be eligible for safe return. The Board agreed and instructed Mr. Johnston to promulgate the language back into rule 262 in 2013.

During Public Comment Mr. Fred Collings, Chief Investigator presented follow up information to an inquiry that Dr. de Blaquiere had made at a previous Board meeting regarding wholesaler responsibility for sales to practitioners for personal use. The regulatory affairs department for Henry Schein had been in recent contact with Mr. Collings and through a brief but productive conversation Mr. Collings felt that Henry Schein was actively pursuing a better knowledge base for responsible product sales.

Mr. Collings also presented a comment regarding the suggested option for spending PMP appropriated grant funds to hire contract workers. Mr. Collings was concerned that hired contract workers might hinder any current or future investigations. The Board acknowledged Mr. Collings concerns, but still approved of grant monies being spent on contract workers visiting prescribers.

The hearing for BOP case number 11-024-A, regarding Lisa Mathis, R.Ph., was vacated due to Ms. Mathis retaining an attorney and the attorney's request for time to review the case.

The reinstatement hearing for BOP case number 12-018, regarding Andrew Welch, Pharm D, was vacated as the Board anticipates assigning a hearing officer to the case.

Mr. Johnston presented the last tab in the financial folder regarding the web-accessed data base program National Precursor Log Exchange (NPLEx), which is being administered by Appriss. Appriss completed the loading of all Idaho independent and retail pharmacies with the exception of Walgreens. Walgreens was due to sign up by August 29, 2012. Initial feedback from Appriss was that utilization of the NPLEx system had been positive. Dr. de Blaquiere provided feedback on the ease and use of the program, once he maneuvered through the registration process. The target date for mandatory use is 9/18/12.

Mr. Johnston presented the travel calendar. Mr. Johnston will attend the NABP Executive Committee meeting September 17th & 18th, in Chicago, IL. Mr. Johnston, and Dr. Chopski will attend the NABP Interactive Member forum on September 19th & 20th, in Chicago, IL. Teresa Anderson, PMP Program Information Coordinator, will be attending the Regional Alliance of States with Prescription Monitoring Programs meeting September 18th & 19th, in Boise, ID. Mr. Johnston will teach a law class at the ISHP Fall meeting on September 30th, in Sun Valley, ID. Mr. Johnston will take vacation from October 9th through October 12th. Mr. Johnston will attend the Tri Regulator symposium on October 17th & 18th, in Washington, DC. Mr. Johnston and Dr. Chopski will attend the NABP District meeting from October 21st through October 24th, in Little Rock, AR. The ISU Dean's Advisory committee will be on October 27th, in Pocatello, ID. The fall Board meeting will be held on November 2nd, in Boise, ID. Mr. Johnston will attend the NABP Interactive Executive Officers forum on November 13th & 14th, in Chicago, IL. Mr. Johnston and Dr. de Blaquiere will attend the ASPL meeting from November 15th through November 18th, in Tucson, AZ. Mr. Johnston will be taking some time off for Thanksgiving.

Board meeting dates for next year were tentatively scheduled. January 17, 2013 will be held in Boise. April 4, 2013 will be held in Pocatello. June 13, 2013 will be held in Boise. July 29, 2013 will be a conference call. August 13, 2013 for a full day and, August 14, 2013 for a half day, will be held in Boise. A fall 2013 meeting date is to be determined.

The Board staff has identified a continued problem with receiving required notifications by Board registrants and licensees. Mr. Johnston penned an article in the June Newsletter that highlighted required Board notifications with the understanding that the Board's staff would be asking the Board for delegated authority to add notification failure to the 'Routine Offenses' list

and institute a monetary fine, without a Board appearance. The newsletter is the Board's official form of notification, as listed in the newsletter and Board rule 007 and allows the newsletter to be used as proof of such notification in an administrative hearing. Mr. Johnston hoped that listing such discipline in future newsletters would bring attention to the problem and assist in eliminating it. Dr. Henggeler motioned that a fifty ($50.00) dollar fine be implemented for notification failure, providing the Board's staff with delegated authority to enforce. The motion failed for lack of a second. Dr. de Blaquiere motioned for a fifty ($50.00) dollar fine for a first offense and a one hundred ($100.00) dollar fine for a second offense, with delegated authority for the Board staff to enforce. Dr. Henggeler seconded. After further Board discussion, the motion passed unanimously.

Dr. Chopski motioned to adjourn. Dr. Henggeler seconded. The motion passed unanimously. The meeting ended at 3:20 p.m.

AUGUST 22, 2012

This meeting of the Board was held to conduct regular Board business.

Chairman Berk Fraser, R.Ph., called the meeting to order on August 22, 2012 at 8:04 a.m. In attendance were Board members Richard de Blaquiere, Pharm D; Nicole Chopski, Pharm D; Holly Henggeler, Pharm D; Ed Sperry, and Mark Johnston, R.Ph., Executive Director; Nicole McKay, DAG; Kathy Takasugi, DAG; Jan Atkinson, Senior Compliance Officer; Fred Collings, Chief Investigator; Lisa Culley, Compliance Officer; Mike Brown, Compliance Officer; Gina Knittel, Compliance Officer; and Wendy Hatten.

Chairman Fraser requested that Mr. Johnston lead the agenda item entitled Negotiated Rulemaking Hearing & Open Public Comment. Mr. Johnston proceeded to explain in detail the Board's draft statute and rule changes pertaining to nonresident drug outlets, including changes to the following sections of Idaho Code and its administrative rules: 54-1701, 54-1702, 54-1704, 54-1705, 54-1720, 54-1721, 54-1723A, 54-1726, 54-1728, 54-1729, 54-1730, rule 010, rule 011, rule 021, rule 029, rule 035, rule 060, rule 073, rule 090, rule 320, rule 600, rule 610, rule 641, rule 650,rule 651, and rule 680.

Chairman Fraser called for public comment. Mr. Dennis McAllister, R.Ph., Director of Pharmacy Affairs of Express Scripts presented public comment. First, Mr. McAllister requested that the word "and" in the draft definition of "mail service pharmacy" be changed to "or", as many mail service pharmacies centralize their cognitive services. Secondly, as pharmacists within out-of-state mail service pharmacies are exempt from registration or licensure, Mr. McCallister believes that the pharmacists within nonresident drug outlets that provide centralized pharmacy services for the out-of-state mail service pharmacies should also be exempt, with the exception of the proposed registration of a pharmacist-in-charge at each location. The Board directed Mr. Johnston to make such changes. Mr. Dan Luce, Pharm D, Pharmacy Director of Walgreens, spoke in favor of the draft language. Mr. Johnston read submitted public comment regarding nonresident drug outlets from Chris Ciolko, R.Ph., Senior Vice President, Business Development of Pipeline Healthcare, John Jones, R.Ph., J.D. Vice President of Government Affairs and Pharmacy Policy of OptumRX, Inc., and Envision RX.

After much Board deliberation regarding the draft nonresident statue and rule drafts, in addition to Mr. McAllister's approved requests, the Board directed Mr. Johnston to draft the following changes:

- Change all existing statutory uses of "medication" to "drug".
- Change all existing statutory uses of "regulation" to "rule" or "law".
- Change all existing statutory uses of "prescription", "order", or terms of the like to "prescription drug order or order".
- Update all outdated language within statutes included in this project that are not currently part of this project, such as statutes pertaining to student pharmacists and preceptors.
- Add "registered" to all pertinent references of a "licensed pharmacist".
- Add "retrospective review" to 54-1704.
- Add "United" to "States" in 54-1705(22).
- Condense the definition of "pharmacist" and "prescription drug order" without changing the meaning.
- Add draft "ratio" language to draft 54-1723A(3) and draft 54-1729(6) and clarify that "Board" means the Idaho Board of Pharmacy.

- Add an attestation to draft rule 035.03, concerning following Idaho law.
- Adapt rule 060.03 to remove reciprocity language.
- Adapt rule 320 to ensure differentiation from centralized pharmacy services, as the independent practice of pharmacy should pertain to health fairs, “on call” conversations, personal conversations and communications of such and should not pertain to centralized pharmacy services provided to hospital pharmacies from a home location, etc.
- Add the location of the pharmacist to the audit trail requirements of draft rule 610.06.
- Move exemption from rule 073.02.c to 54-1721.
- Add attestation to rule 073.

The Board thanked Mr. Johnston and Ms. McKay for all their hard work and the impressive organization of the material created and presented.

Mr. Fraser called the meeting back to order after a short break and took more public comment from Mr. McCallister and Dr. Luce, who both spoke against proposed rule changes that would require the pharmacist’s initials on the label of dispensed prescriptions, citing ISMP guidelines.

Chairman Fraser then asked Mr. Johnston to detail draft rule changes that were not included in the nonresident drug outlet drafts. Mr. Johnston presented draft changes to the following rules:

Rules Subchapter A Standard Provisions
010. 011. & 012. Definitions & Abbreviations
016. Board of Pharmacy License and Registration
018. License and Registration Reinstatement
019. License and Registration Inspection
021. Fee Schedule
031. Pharmacist Licensure By Examination – Foreign Pharmacy Graduates
034. Pharmacist Inactive Status License
036. Student Pharmacist Registration
041. Technician-In-Training Registration
042. Pharmacy Technician Certification – Continuous Employment Exemption
052. CPE Requirements
110. Prescription Drug Order – Validity
115. Prescription Drug Order Transfers
130. Drug Product Substitution
131. Drug Product Selection
140. Standard Prescription Labeling
142. Parenteral Admixture Labeling
200. Controlled Substances – Positive Identification Required
204. Controlled Substances – PMP.
206. Controlled Substances – Inventories
260. Drug Product Storage

Mr. Johnston received via courier and read written public comment from Sullivan, Reberger & Eiguren, representing United Health, suggesting changes to draft rule 029, The Board was not supportive of such changes.

Mr. Fraser called the meeting to order after a lunch break, and Mr. Johnston continued presenting draft changes to the following rules.

290. ADS System – Minimum Standards
291. ADS Systems – Self Service Systems
292. ADS Systems – Institutional Facilities
293. Vending Machines
330. Pharmacist Administered Immunizations
500. Unprofessional Conduct
503. Prescription Delivery Restrictions
600. Pharmacy Registrant and PIC or Director
601. Pharmacy Space and Fixtures
605. Pharmacy Security
606. Pharmacy Notification and Advertising of Hours Open for Business
609. Pharmacy Change of Ownership or Permanent Closing
622. Institutional Pharmacy Director – Minimum Responsibilities
631. Institutional Facility – Emergency Drug Access and Pharmacist Absence
632. Institutional Facility – Emergency Drug Supply Preparation and Monitoring
637. Institutional Facility – Emergency Outpatient Drug Delivery By Hospital Emergency Rooms
640. Institutional Facility – Offsite Pharmacy Practice Standards
730. Out of State Mail Service Pharmacy
750. DME Outlet Standards

Chairman Fraser called for public comment regarding ADS rules.

Public comment on draft changes to rule 291 was presented by Dorsie Sullenger, R.Ph., Pharmacy Director of Madison Memorial Hospital, Ms. Julie Geason, R.Ph., Director of Pharmacy, Vice President of Pharmacy Services of InstyMeds, and Edward Rickert, R.Ph., attorney at Krieg Devault, on behalf of InstyMeds. After much deliberation, the Board directed Mr. Johnston to make the following changes to draft rule 291:

- Add a mandatory ADS dispensing stop for products requiring reconstitution so a nurse or prescriber can reconstitute.
- Drugs must be prepackaged for use, not stocked in bulk.
- Clarify that use is only for ER patients.
- Vouchers to use the system must expire within 24 hours.

As the Board could not come to unanimous consent concerning controlled substances within a self service ADS, Dr. Chopski motioned that proposed language regarding controlled substances in a self service ADS machine be harmonized with rule 637. Dr. de Blaquiere seconded. Vote: Three (3) in favor with Dr. Henggeler opposed.

Chairman Fraser called for the agenda item Request for Waiver or Variance. Mr. Sullenger and Mr. Rickert presented a request for a waiver or variance, allowing Madison Memorial Hospital to utilize InstyMeds' self service ADS prior to anticipated legislative approval. Mr. Sperry motioned to allow the request for waiver or variance, as he believes the Board would benefit from data gained from one hospital's use of such an ADS before the rule changes for everyone to utilize. The motion failed for lack of a second. Dr. Chopski motioned to table the waiver or variance request until the next scheduled meeting, to see if any negative public comment was received, during the official public comment period. Dr. de Blaquiere seconded. Vote: Three (3) in favor with Mr. Sperry opposed.

Chairman Fraser called for additional public comment.

Mr. Johnston read public comment regarding ADS rules from Dawn Berheim, Pharm D., Director of Pharmacy St. Luke's Meridian, concerning pharmacist review and product return.

Mr. Taylor Nielson, Director of Pharmacy West Valley Medical Center provided public comment regarding draft rule changes to 130.03, 292 , and 637.

Mr. Mark Phillips, Director of Pharmacy St. Alphonsus Regional Medical Center provided public comment on rule 292.

Mr. Sullenger provided public comment on rule 292.

Pursuant to public comment, after much deliberation, the Board directed Mr. Johnston to draft the following changes:

- Strike "verifiable proof of" from draft rule 130.03.
- Strike the second sentence in 292.02.d.
- Add 292.02.e: "The prescriber controls the drug administration process in procedural areas".
- Strike "drug" and replace with "controlled substance" in 292.03.a and 292.04.
- Remove "device" in 292.03.b & c.
- In rule 292, allow product return to ADS systems by authorized personnel if the hospital is utilizing bar code scanning technology at the bedside or at the ADS.
- Strike "securing and" and "or discarded" and add "if wasted before completing the transaction". from 292.04.
- Strike 292.04.d & f and "as needed" from h.
- Strike "nurse" in 292.04 and replace with "authorized user".

Mr. Fraser called the meeting back to order after a short break.

Mr. Johnston read public comment from Donna Horn, R.Ph., Director of Pharmacy Safety, Institute for Safe Medication Practices (ISMP), requesting the striking of proposed changes to rule 140, as Mr. McAllister and Mr. Luce has commented. The Board believed that such initials were needed to conduct investigations and supported the inspectors and draft language as written. Dr. Henggeler motioned to keep rule 140 as proposed. Dr. Chopski seconded. There was further Board discussion. The motion passed. Dr. de Blaquiere abstained.

Due to the 2012 promulgation of rule 012, Ms. Atkinson verified for the Board that a screen print from the 'Verify a License' page on the Board's website is considered proof of licensure/registration.

Mr. Johnston clarified for the Board that grandfathered technicians can register as a Pharmacy Technician in Training, or if nationally certified, as a Certified Pharmacy Technician at any time during their current employment. Mr. Johnston also noted that although it may appear that the background check process is the main reason for delays in the issuance of technician registrations, the Board staff receives a large amount of applications that are incomplete which causes delay in issuing registrations.

In response to Mr. Moore's agenda item, Mr. Johnston proposed that he publish a hearing notice in the January Administrative Bulletin concerning all common carrier issues. The Board approved of such a hearing.

The Board directed Mr. Johnston to draft the following changes:

- Strike “expire on” and replace with “renew by” in rule 041.02
- Add “or director” to rule 206.03.
- Harmonize rule 632 with prior decisions concerning rule 291.

Mr. Johnston presented draft statutory language that would allow pharmacists and other practitioners to share legally obtained PMP data with other pharmacists and practitioners. The Board desires to create a program to allow such authorized PMP users, via e-mail, to alert other authorized users that have prescribed or dispensed to a certain patient. The draft is supported by Representative Rusche. The Board would ultimately like to have “practitioner” changed to “prescriber” when the whole Uniform Controlled Substances Act is rewritten, which is anticipated to be in 2014. The Board approved of the draft via unanimous consent.

Ms. Taryn Reeve, ISU student pharmacist on rotation with the Board, presented Uniform Controlled Substance Act draft legislation changes that would incorporate by reference those substances also scheduled federally, thus striking the overwhelming majority of the substances listed in Schedule I-V. The remaining scheduled substances, unique to Idaho, were reviewed with assistance from the Idaho State Police forensic lab, and several of these substances are also proposed to be struck because they either do not comply with the definition of a controlled substance or are overlapping substances by a different name than those already scheduled federally. Mr. Johnston commented that this project would not only result in the reduction of many pages of Idaho code, but that it would eliminate the need for the legislature to approve a bill each year that simply updates the scheduling action by the DEA, allow a substance scheduled by the DEA to officially become scheduled in Idaho at the same time as opposed to 30 days later, and allow local police who cannot enforce federal law to enforce such scheduling upon the federal effective date. The Board approved of the draft language via unanimous consent.

Dr. Chopski motioned to adjourn. Dr. Henggeler seconded. The motion passed unanimously. The meeting ended at 5:15 p.m.