California State Board of Pharmacy
1625 N. Market Blvd, N219, Sacramento, CA 95834
Phone: (916) 574-7900
Fax: (916) 574-8618
www.pharmacy.ca.gov

ENFORCEMENT AND COMPOUNDING COMMITTEE
MEETING MINUTES

DATE:	June 7, 2018
LOCATION:	Department of Consumer Affairs First Floor Hearing Room 1625 North Market Blvd Sacramento, CA 95834
COMMITTEE MEMBERS PRESENT:	Allen Schaad, Licensee Member, Chair Amy Gutierrez, PharmD, Licensee Member, Vice Chair Gregory Lippe, Public Member Stan Weisser, Licensee Member
COMMITTEE MEMBERS NOT PRESENT:	Valerie Munoz, Public Member
STAFF MEMBERS PRESENT:	Virginia Herold, Executive Officer Anne Sodergren, Assistant Executive Officer Laura Freedman, DCA Staff Counsel Kelsey Pruden, DCA Staff Counsel Joshua Room, Supervising Deputy Attorney General Laura Hendricks, Staff Analyst MaryJo Tobola, Senior Enforcement Manager

1. Call to Order and Establishment of Quorum and General Announcements

Chairperson Allen Schaad called the meeting to order at 10:01 a.m.

2. Public Comment for Items Not on the Agenda, Matters for Future Meetings

Dr. Steven Gray requested that the committee consider the issue of when a pharmacist prescriber must consult the CURES database. Dr. Gray noted that recently released information from DOJ did not include prescriber pharmacists, as may be required by the law. Dr. Gray estimated that over 3,000 pharmacists may have DEA permits.

Paige Talley, California Council for the Advancement of Pharmacy requested that the committee consider the issue of developing a definition of a "significant loss" as referenced in regulation.

Danny Martinez, CPhA, requested the committee consider the issue of contracting with non-resident inspection agencies to aid Board of Pharmacy inspectors.

Robert Stein, KGI School of Pharmacy, requested that the committee consider discussing the circumstances under which a pharmacist has the authority to prescribe controlled substances pursuant to travel medication protocols. Board staff suggested that this could be addressed through an article in the newsletter.

Jenny Partridge independent pharmacist, also requested the committee consider outside accrediting agencies to help the board conduct inspections of nonresident pharmacies.

3. Discussion and Consideration of Enforcement Committee Strategic Goals for Fiscal Year 2018/19 and Thereafter

Chairperson Schaad stated that in 2016 the board finalized its current Strategic Plan. He recommended that the committee discuss its strategic goals for the coming fiscal year as well as the remainder of the plan.

Chairperson Schaad identified the goals currently include in the board's strategic plan, along with their status. He requested the committee consider modifying and updating the current goals.

2.1 Implement processes to shorten the cycle times from investigation to resolution of cases,
with special focus on prioritized critical cases, to minimize patient harm and enhance consumer protection.

The committee discussed investigation timelines and investigative criteria. The committee expressed concern with how to ensure consumer protection between the time a violation is identified and the time the license is disciplined.

Board staff clarified that through the Consumer Protection Enforcement Initiative (CPEI), DCA has determined that the current goal to complete a case, resulting in formal discipline, is 540 days from the date the case is received to discipline. As a result, the board staff developed cycle times based on benchmarks determined by DCA.

Deputy Attorney General Joshua Room, informed the committee that a completion time from the receipt of the case investigation to prosecution of 540 days was always meant to be aspirational and not based on existing timelines.

Board staff informed the committee the board may issue Interim Suspension Orders, Cease and Desist Orders, and utilize PC 23 to ensure consumer safety while pursuing disciplinary action.

Ms. Sodergren stated board staff would prepare case prioritization for committee review to offer the committee the opportunity to adjust prioritization and establish benchmarks for data gathering purpose.

2.2 Strengthen patient consultation outcomes for Californians and increase medication safety.

Chairperson Schaad stated that the board is seeking to strengthen patient consultation requirements for mail order pharmacies. In addition, the board has received general information about board investigations involving patient consultation violations and efforts taken by district attorneys reaching settlements, as a way to gain better compliance.

Chairperson Schaad suggested that the committee could identify specific goals or actions by which improvement can be measured.

Board staff suggested a partnership with the Attorney General's office to identify better ways to investigate and substantiate patient consultation violations. Ms. Sodergren informed the committee that there have been challenges with proving these violations, from an evidentiary standpoint. She requested that the committee allow staff to work in coordination with the AG's office, in order to create investigative benchmarks, collect data based on the new benchmarks, and present that data to the committee during a future meeting.

Ms. Sodergren stated board staff would work with the Office of the Attorney General's to improve the board's investigations into patient consultation compliance and segment out cases involving patient consultation.

Public comment was heard. Dr. Gray pharmacist, encouraged the collection of data for all strategic goals. He encouraged the review of "integrity agreements" reached as part of the settlements with the District Attorneys.

2.3 Collect data and report to board members about enforcement trends that are presented at
case closures so the board can better educate licensees about board priorities.

Chairperson Schaad and board staff informed the committee that multi-year enforcement statistics are currently provided on an annual basis during the July board meeting.

2.4 Evaluate industry technology trends to develop future regulatory infrastructures that promote patient safety.

Chairperson Schaad stated that the board convened a technology summit on the use of automated drug delivery systems (ADDS) and evaluated the findings of a pilot project expanding the use of ADDS. The board is currently sponsoring legislation to establish a regulatory framework for ADDS and expand the conditions when an ADDS can be used.

2.5 Evaluate the disciplinary process and initiate process improvements for enhanced efficiency and effectiveness.

Chairperson Schaad stated that during this meeting the committee will hear a presentation on the disciplinary process and performance statistics provided by the Office of the Attorney General.

2.6 Collaborate with stakeholders to identify and expand resources for technicians who experience substance abuse to provide assistance in recovery.

2.7 Investigate options on the interoperability with a National Prescription Drug Monitoring Program.

Chairperson Schaad confirmed that there is pending legislation regarding the National Prescription Drug Monitoring Program.

In addition to these existing strategic goals, Chairperson Schaad recommended that the committee consider feedback received from pharmacists in practice, in particular Pharmacists in Charge (PICs), regarding complaints about inconsistent enforcement of compounding regulations, fear of retaliation, and expense and time in the development of a licensee's defense. Chairperson Schaad suggested creating a process where pharmacists could anonymously complain about inspectors and the inspections. He expressed his desire for the committee and the board to be informed of these complaints in a timely manner.

Ms. Herold informed the board that complaints about board employees, such as inspectors, is a personnel matter and have been handled internally. She stated that in order to keep the members informed a new feedback system to the members must be developed. Ms. Herold informed the committee that there may be union bargaining issues if personnel actions are made public.

Dr. Gutierrez stated that she and other members have received complaints by email regarding inspectors and inspections. She encouraged a system to be developed where complaints could be directed to the board for investigation by the Executive Officer or the Assistant Executive Officer. Dr. Gutierrez also inquired how other boards are handling complaints about their own investigative staff.

Chairperson Schaad said he would like some way for pharmacy professionals, who find themselves victims, to bring up these complaints outside of the board of pharmacy.

Ms. Sodergren stated that staff could research systems developed by other boards. She also informed the board that encouraging anonymous complaints could prove to be problematic, in that it is often difficult to obtain evidence or provide follow-up, during the course of the investigation.

The committee heard public comment. CPhA expressed support of the motion and suggested establishing an ombudsman position.

Motion: Amend the strategic plan to include the recommendation to add a policy goal to

develop a process to submit complaints about inspectors anonymously and report back to the board.

M/S: Gutierrez/Lippe

Support: 4 Oppose: 0 Abstain: 0

In addition, Chairperson Schaad expressed his interest in assessing unintended consequences of discipline. He asked the committee to discuss consequences, such as the time and expense of defending a disciplinary action, the expense of Maximus for probationers and the adverse effect that a disciplinary action could have on an out of state license.

Motion: Amend the strategic plan to include the assessing of collateral consequences post discipline and research options.

M/S: Weisser/Lippe

Support: 4 Oppose: 0 Abstain: 0

Mr. Weisser recommended that more frequent meetings would help address these additional strategic goals during this current fiscal year.

In response to Mr. Weisser's suggestion, Ms. Sodergren informed the committee that the frequency of meetings is scheduled to increase after June 2019, to allow the committee the opportunity to work on the implementation of the revised compounding chapters and implementation of USP 800.

Ms. Sodergren informed the committee that for board members who are interested, they can attend office cite and fine office conference appeals. This would allow the member to sit through the process and have an opportunity to discuss and observe.

Public comment was heard. Dr. Steve Gray, pharmacist, stated that he is in favor of a complete review, but cautioned about having board members express their opinions during office conferences because of varying interest and opinions of individual members.

Motion: Amend the strategic plan to include the recommendation to complete an evaluation of the board's Citation and Fine process.

M/S: Gutierrez/Lippe

Support: 4 Oppose: 0 Abstain: 0

Ms. Sodergren stated that board staff has recently experienced an influx of issues and concerns regarding partial fills and the insurance problems that resulting from the partial fills. Ms. Sodergren asked the board if they would like to direct staff to collect data

regarding insurance problems with providing partial fills. She stated that the data collected could be forwarded to another regulating agency to assist them in determining if an amendment to their regulations are necessary to resolve the issues.

Public comment was heard. Dr. Gray pharmacist, anticipates that there will be an increase in complaints due to changes in law effective July 1, 2018. Additionally, Dr. Gray indicated that the problem is increasing because Medi-Care and Medi-Cal are enforcing against medication amounts dispensed versus what was prescribed. CPhA expressed support, as they are also aware of these partial fill issues in regard to Medi-Cal.

Chairperson Schaad advised that insurance adjudication on partial fill prescriptions should be a future agenda item.

The committee discussed whether a Pharmacist in Charge (PIC) should be solely responsible. Chairperson Schaad stated that discussion should include that PICs have overwhelming responsibility without the power to make changes.

Dr. Gutierrez informed the committee that Idaho and Maryland are no longer holding PICs responsible, but now the store or pharmacy owners. She suggested researching their current policies.

Motion: Amend the strategic plan to include the recommendation to review the role and responsibility of the PIC.

M/S: Weisser/Gutierrez

Support: 4 Oppose: 0 Abstain: 0

Member Stan Weisser exited the meeting at 12:14.

4. Discussion and Presentation of the Administrative Case Process and Case Resolution Times for Matters Referred to the Office of the Attorney General

Supervising Deputy Attorney General (SDAG) Joshua Room provided a presentation on the disciplinary process. SDAG Room provided insight into some of the challenges that may impede more swift resolution of disciplinary matters.

Listed below are questions presented by the committee members and answers provided by SDAG Room.

Q: Are assessments of each case's ability to meet the burden of proof conducted at your office or at the county?
A: The office of the AG is divided into the various cities: Oakland, San Francisco, Sacramento, Los Angeles, San Diego and Fresno. Cases are assigned by geographic proximity. Ultimately, the assigned DAG, in consultation with their supervisor, decides if a case can be filed.

Q: Do DAGs maintain specialty areas of law?
A: There is some specialization, but all DAGs should be capable of handling pharmacy cases.

Q: Does Board of Pharmacy have a statute of limitations?
A: The Board of Pharmacy does not.

Q: How does a criminal conviction impact the AG's case?
A: It depends on how much evidence already exists. If it is in relation to the boards case then the AG's case is much stronger. If we have enough evidence, I will often advise that we plead the case and file it now. Each case has to be handled on a case by case basis. Criminal cases could lead to a significant delay.

Q: If there is a criminal case pending, do you wait for its outcome before pursuing?
A: Sometimes we do, because if we go through with our case and we lose, it could prevent the criminal case from going forward. It would depend on the seriousness and proximity. Individual determinations need to be made. Typically, we place the case on hold.

Q: Where does the pleading originate?
A: The pleading comes directly from the AG's Office.

Q: If the composition of the board changes and has a different operating philosophy, how do you reconsider that offer, keeping in mind the new philosophy, when the offer is returned?
A: A returned settlement offer is returned to the same assigned DAG for the prosecution and the DAG is aware of the background that was used in determining the offer. Usually, decisions are made based on disciplinary guidelines. Individual board members' perspectives cannot be used to determine how to respond, rather board staff must rely on common actions of the board. The board staff that the DAG consults with have to use their historical knowledge of "common actions" when making amendments to settlement offers.

Q: How many cases are settled?
A: We have to settle at least 80% of our cases. 15-20% of our cases go to hearing, across all matter types.

Q: When is the standard of proof "clear and convincing" and when is it "preponderance of evidence"?
A: For any professional license, such as a pharmacist, the standard of proof is "clear and convincing". For vocational licenses, such as a pharmacy technician, the standard of proof is "preponderance of evidence".

Q: What is burden of proof for sites?
A: The board has determined that sites are non-professional licenses and therefore the

standard of proof is “preponderance of evidence”. The only licenses deemed “professional” are those commensurate with a professional degree.

Q: When there is a case where a pharmacy and a pharmacist are both involved, is the pharmacist license held to a higher standard or burden of proof?
A: There should be a different burden of proof for each respondent in that case.

Q: How do you reconcile taking action against a licensee when four or five years has passed since the violations occurred, as people change.
A: Typically, a delay in resolution of a matter is a benefit to the respondent in the matter because the delay has afforded the respondent time to show themselves as rehabilitated. The passage of time itself should not deter the board from giving a person the disciplinary penalty that is appropriate for their conduct under the board’s disciplinary guidelines.

Q: How long do ISO’s take to issue?
A: Ideally, the goal is to issue an ISO within 30 days.

Q: Are rehabilitation efforts considered when determining a settlement agreement?
A: Yes.

Q: How are Cite and Fines considered in an accusation.
A: Cite and Fines are not disciplinary, but they are administrative sanctions so they are included for disciplinary consideration. They have a small marginal effect.

5. Discussion and Consideration of Implementation Strategy for Anticipated Statutory Changes to Incorporate USP Compounding Chapters

Chairperson Schaad stated that this topic will be an ongoing discussion at future Enforcement Committee meetings, in order to consistently address problems and questions, and provide clarification on implementation.

Dr. Gutierrez asked the audience if they were aware of pharmacies that would be challenged in meeting the December 1, 2019 implementation date. Ms. Herold confirmed that the board has granted about 400 waivers.

Public comments were heard. CPhA requested a basic checklist about what will require compliance by December 1, 2019. Jenny Partridge, Pharmacist, indicated that it has been her observation that independent retail compounding pharmacies are generally compliant with USP 800. Dr. Gray, Pharmacist, suggested that the committee may need to be split back into a compounding committee and an enforcement committee, and suggested the language be changed in the proposed statute to allow more flexibility. Kristopher Le of Dynalabs expressed concern regarding current revised Chapter 797 maximum BUD 45-day max. The committee requested additional data on potency testing results room Dynalabs.

Ms. Herold stated that there are three provisions in our current regulations that have USP 800 provisions in them. Those provisions require specific types of exhaust venting. The waivers granted provide time for pharmacies to complete the required construction of an exhaust vent outside of a room.

Dr. Gutierrez stated that until the board changes statute, pharmacies will be expected to comply with current statutes and regulations.

SDAG Room stated that in his experience USP is typically not drafted in language which allows for easy compliance. He anticipates that regulations will be required in order to interpret USP language for compliance and regulatory enforcement.

Ms. Sodergren stated that the committee has not yet been informed of the progress of hospitals or chains that perform hazardous compounding. She stated that it would be helpful for the committee to be informed about progress in those specific communities. Chairperson Schaad encouraged public representatives from these communities to attend future meetings to update the committee on progress.

6. Discussion and Consideration of Possible Board Policy Relating to Transparency Involving the Issuance of Citations and Fines

Chairperson Schaad stated that during the April 2018 Enforcement Committee meeting, the committee requested that board staff survey all DCA healing arts boards to determine how each board handles general transparency related to the issuance of citations and fines.

Chairperson Schaad informed the committee that all DCA healing arts boards were surveyed to determine whether each board posted citations and fines issued to licensees on their websites.

Chairperson Schaad stated the survey showed fifteen of the eighteen DCA healing arts boards post citations and fines on their website; however, the duration of the postings vary. Chairperson Schaad noted that most boards surveyed are actively using the BreEZe System, which may be programmed to upload citations and fines to their respective sites. The chart detailed the boards surveyed, whether the board posts citations and fines, the length of time citations and fines are posted, and whether or not the board participates in the BreEZe System.

SDAG Room cautioned that posting citations and fines could make settlement cases more difficult; a consequence of making a more public display gives people a reason to appeal and go to hearing.

Public comment was heard. Dr. Gray, Pharmacist, commented that he believed that the posting of citations would result in more appeals received. Further, the adverse

consequences of the posting of such documents, must be fully discussed and considered. CPhA, stated concern that posting could cause the public to lose faith in the profession. Robert Stein of KGI School of Pharmacy, showed support of posting citations and fines and indicated that consumers have the right to be aware of the citations in order to make an informed decision. Additionally, Mr. Stein suggested statutory changes. Paige Talley of CCIP, cautioned that public postings of citations and letters of correction could result in pharmacy benefit managers (PBM) rejecting claims, which would result in a loss of patients and/or revenue.

SDAG Room informed the committee that parameters vary between the DCA boards and there is a lack of uniformity.

Motion: Recommend that the committee move forward to direct staff to identify possible parameters on posting mechanisms and conditions under which citations and fines would be posted for 3 years.

M/S Gutierrez/Lippe

Support: 3 Oppose: 0 Abstain: 0

7. Discussion and Consideration of Laws and Regulations Related to Petitions for Reduction of Penalty (Reinstatement, etc.) of Disciplined Licenses

Chairperson Schaad provided background information. Business and Professions Code section 4309 establishes the conditions under which an individual may petition the board for reinstatement of license that has been revoked or suspended. It also establishes the conditions under which a licensee may petition the board for a modification to a penalty, including modifications to probationary terms or early termination of probation. This section further specifies the time frames that must be satisfied before a petition can be considered including:

(1) At least three years for reinstatement of a revoked license.
(2) At least two years for early termination of probation of three years or more.
(3) At least one year for modification of a condition, or reinstatement of a license revoked for mental or physical illness, or termination of probation of less than three years.

Further Chairperson Schaad stated that this section provides that a petition cannot be considered while the individual is under sentence for a criminal offense, including any period in which the individual is on court-imposed probation or parole. In addition, a petition cannot be considered if there are additional accusations or a petition to revoke probation pending with the board.

Chairperson Schaad stated that in recent years the board has considered such petitions at specially convened board meetings where the primary focus of the agenda is consideration of such petitions. Although the law allows for different adjudication processes, the board's

policy in this area is to convene these petition matters as part of a board meeting whenever possible and to have the hearing presided over by an administrative law judge (ALJ). Following the hearings, board members meet in closed session with the ALJ to deliberate on the matters presented during open session hearing. Once the board makes its determination, the ALJ drafts the decision on behalf of the board.

In the event a quorum of the board cannot be achieved, the board's policy allows for petitions to be heard by a committee of the board. In such cases, the ALJ will draft a proposed decision for each petition and the decision will then be considered by all members as part of the mail vote process.

Under the law, a third option also exists where petitions are considered by an ALJ independent of the board. In such cases, the ALJ renders a proposed decision, which is then considered by all members as part of the mail vote process.

In all three scenarios the respondent provides a packet of information and supporting materials intended to provide the board with information in advance of the hearing. Such information includes:

- Personal Information and license history information.
- Letters of recommendation from board licensees.
- Letters of recommendation from citizens.
- Continuing education.

Chairperson Schaad informed the committee that the respondent is also afforded the opportunity to provide oral testimony under oath. In addition to the respondent's testimony, a representative of the Attorney General's Office is present and represents the people of California. The AG's Office is allowed to question the respondent as well as any witnesses. Although not done in all cases, the AG's Office may offer a recommendation to board on the outcome of the petition. Technically, the board does not have representation in these petitions, and typically board staff does not offer testimony.

Since July 1, 2015, the board has considered 41 petitions including 26 petitions for early termination, two petitions for modification of penalty and 13 license reinstatements. Decisions are not final for all of the petitions heard, but of those where decisions have been rendered, 13 petitions have been approved and 17 petitions have been denied.

For committee discussion, Chairperson Schaad stated that as provided in law, the board may consider factors including, but not limited to, the following:

1. All the activities of the petitioner since the disciplinary action was taken.
2. The offense for which the petitioner was disciplined.
3. The petitioner's activities during the time the license was in good standing.
4. The petitioner's documented rehabilitative efforts.
5. The petitioner's general reputation for truth and professional ability.

To assist in the collection of the relevant information and to provide guidance to potential petitioners, the board has developed petition packets that detail both required and supplemental materials sought from the petitioners and some FAQs about the process.

Chairperson Schaad stated that the criteria established in the law is very general. Staff is hopeful that the committee will provide policy guidance recommendations that ultimately can be considered by the full board when considering petitions. Such policy discussion will assist staff in ensuring the petition information collected is meaningful.

Chairperson Schaad identified some questions the committee may wish to consider:

1. Is the current process for hearing petitions sufficient, or should the board consider reevaluating its policy?
2. Would it be helpful to have board staff testify regarding compliance with terms and conditions of probation, rehabilitative efforts demonstrated by the respondent, public protection concerns, etc?
3. Would it be helpful to request additional information in advance of the hearing from the petitioner to aid the board in making its decision?
4. Does the board wish to establish additional parameters a petitioner must satisfy prior to being eligible to petition the board?
5. Should a time frame be established that provides clarity on how long a petitioner has to satisfy the requirements set by the board for reinstatement? For example, pass the NAPLEX, pass the CPJE, pay fines, etc.

As part of the discussion, board staff was directed to send petition materials to coincide with the release of the agenda, ten days before the hearing.

Dr. Gutierrez recommended to clarify petition question #15 to include “except for this action.”

Ms. Sodergren requested the committee to provide policy direction on allowing board staff the discretion to postpone a non-compliant petitioner’s hearing in order to address their compliance issues. She informed them that this would allow compliant petitioners to be scheduled for hearings sooner.

Additionally, Ms. Sodergren asked the committee if they were interested in amending statute to state that if a reinstatement is granted the person has a specified amount of time to satisfy the conditions for licensure. With the committee’s approval of the concept, board staff could draft an implementation plan that could be brought to the full board to demonstrate the committee’s policy recommendation and suggestions for facilitation.

Legal staff identified that Business & Professions Code section 4309 would require such an amendment.

Public comment was heard. Dr. Gray, Pharmacist, recommended that the committee limit the numbers of petitioners heard.

Motion: Direct board staff to develop statutory language to establish a requirement for 1 year to complete the requirements for reinstatement.

M/S: Gutierrez/Lippe

Support: 3 Oppose: 0 Abstain: 0

Motion: Authorize board staff to identify ways to prioritize those probationers that are compliant.

M/S Gutierrez/Lippe

Support: 3 Oppose: 0 Abstain: 0

8. Discussion and Consideration of Current Board Investigation Time Frames and Performance Measures

Chairperson Schaad presented the pending field investigations as of June 1, 2018.

Ms. Sodergren asked if it would be helpful to have new or additional information about investigative time frames at future meetings.

Dr. Gutierrez suggested converting the data into percentages.

Public comment was heard. A member of the public suggested that confusion may be due to lack of information shared by the inspector at the visit. In response, board staff stated that in most cases, the inspector is unaware of what administrative actions result from their investigation or inspection.

Mr. Lippe suggested that correspondence be sent to the licensee which informs them their case has been forwarded to the AG's office, which would prepare them for future communication from the AG's office.

9. Discussion and Consideration of the Board's Enforcement Statistics

Chairperson Schaad introduced the enforcement statistics for the first 10 months of the fiscal year.

Ms. Sodergren suggested that in addition to reviewing the statistics, the committee may wish to provide staff with feedback on the current format and data elements provided as well as suggested changes.

The committee recommended that board staff include Proof of Abatements issued, average investigation times, strategic goal(s) measures, and cease and desist orders for

unlicensed activity.

10. Discussion and Consideration of Potential Statutory or Regulatory Amendments to Allow a Reverse Distributor to Accept Medications for Destruction in Limited Circumstances from a Previously Licensed Source

Chairperson Schaad informed the committee that under current law, a reverse distributor is prohibited from acquiring dangerous drugs and devices from an entity unless the entity is licensed. This occasionally creates a barrier to the removal and destruction of such products when a pharmacy, wholesaler or other license is cancelled, surrendered or revoked.

Chairperson Schaad stated that the board staff is requesting that the committee consider pursuing a change in the law that would create a limited exception to allow for a reverse distributor to remove and arrange for the destruction of the drug products for a limited period after a license is cancelled, surrendered or terminated. Should the committee and board agree, staff will work with counsel to develop language.

MOTION: Direct board staff to develop a proposal to allow for a reverse distributor to take back some medications.

M/S: Lippe/Gutierrez

Support: 3 Oppose: 0 Abstain: 0

11. Future Committee Meeting Dates

An error was identified on the agenda. The correct meeting dates are September 5, 2018 and December 13, 2018. Additional date(s) may be considered, to be announced at a later date.

Meeting adjourned at 3:49 p.m.