DEPARTMENT OF BUSINESS AND
PROFESSIONAL REGULATION

DRUG WHOLESALE DISTRIBUTOR
ADVISORY COUNCIL

MAY 10, 2018
8:30 A.M. - 9:41 A.M.

FLORIDAYS RESORT/ORLANDO
12562 INTERNATIONAL DRIVE
ORLANDO, FLORIDA

REPORTED BY:
HEATHER HOWARD, COURT REPORTER
NOTARY PUBLIC/STATE OF FLORIDA
BOARD MEMBERS PRESENT:

STEVE MAYS, CHAIR
JEENU PHILLIPS, VICE CHAIR
MICHAEL MONE
SCOTT BROCK (TELEPHONIC)
ARLENE ELLIOTT (TELEPHONIC)
DEAN ELLIS
PATRICK BARNES
PETER HART
JENNIFER GOLDMAN

DBPR STAFF:

DREW WINTERS, DIVISION DIRECTOR
RENEE ALSOBROOK, COMPLIANCE MANAGER
DINAH GREENE, GOVERNMENT OPERATIONS CONSULTANT

COURT REPORTER:

Heather Howard, American Court Reporting
May 10, 2018 8:30 a.m.

(The May 10th, 2018 DBPR Drug Wholesale Distributor Advisory Council meeting was called to order, after which the following took place:)

CHAIR MAYS: Good morning, everyone. This is Steve Mays. I'd like to call this meeting of the Drug Wholesale Distributor Advisory Council to order.

Before we get started, we have a court reporter in the room, I see. Right? Okay. Good. Couple of things. Those of you members in the room, you will -- if you're going to speak, you'll have to hold your microphone button on while you're speaking. It's not one of those -- all of these are not touch and forget. So you have to hold it down while you're speaking.

For everyone -- and also for those in the room and everyone on the line, please make sure that if you're going to ask a question or make a comment, please identify yourself by giving us your name.

And for anyone on the phone, please mute
your line when you're not speaking so we don't pick up a lot of background noise or anything like that. But please do not put us on hold.

Ms. Greene, I think we're ready for a roll call.

MS. GREENE: Yes, sir.

Steve Mays.

CHAIR MAYS: Present.

MS. GREENE: Jeenu Phillips.

DR. PHILLIPS: Present.

MS. GREENE: Michael Mone.

MR. MONE: Present.

MS. GREENE: Scott Brock.

MR. BROCK: Here.

MS. GREENE: Arlene Elliott.

MS. ELLIOTT: Present.

MS. GREENE: Dean Ellis. (No response.) Jeffrey Tuller -- is out.

Patrick Barnes.

MR. BARNES: Here.

MS. GREENE: Peter Hart.

MR. HART: Present.

MS. GREENE: And Jennifer Goldman. (No response.)

We have a quorum.
CHAIR MAYS: Thank you.

I want to start the meeting off, as usual, by reading the goals of the Council as stated in Chapter 499 of the Florida Statutes.

The Council shall review this part and the rules adopted to administer this part annually, provide input to the Department regarding all proposed rules to administer this part, make recommendations to the Department to improve the protection of the prescription drugs and public health, make recommendations to improve coordination with other states' regulatory agencies and the federal government concerning the wholesale distribution of drugs, and make recommendations to minimize the impact of regulation of the wholesale distribution industry while ensuring protection of the public health.

So we have no items under the chair's report today, but you'll see, under Tab 1 you'll find the meeting transcript from our February 15th meeting.

And I now want to turn it over to Mr. Winters. And I think he's got a couple of introductions to make.
MR. WINTERS: Thank you, Mr. Chair. Again, Drew Winters, Director for the Division of Drugs, Devices and Cosmetics.

Yes, just for a quick moment there's a couple people that I would like to recognize in the audience since they're not usual attendees for us.

First, I'd like to recognize Robin Smith, our Deputy General Counsel for the business side with the Department of Business and Professional Regulation. She has taken the opportunity to come down and be with us today and take part not only in the council meeting, but also the subsequent proceedings we have for this afternoon.

We want to thank her for her help and all the great leadership she provides for us in the Office of the General Counsel. So.

And then also I'd like to recognize Mary Mayleben. She's our Enforcement Program Administrator and one of our hard workers in the field and provides a lot of oversight and management skill that we desperately need out in the field.

And we want to recognize her. She is a
great asset to the Division and she had the
opportunity to come over and meet the council
today as well. So I want to recognize them.

And then you will hear from two gentlemen
as well that are sitting in the front row. We
have Andrew Janecek and Alex Bosque from our
Division Bureau of Education and Testing.
They'll be here to provide an informational
presentation on our CDR examination, but I want
to recognize them as well and their efforts and
time to come down here and talk to us.

So with that I'd just like to recognize
those individuals in the room so that you're
aware of who they are and where they're at. So
thank you all for attending today.

And, Mr. Chair, with that, if you'll allow,
I guess I'll go ahead and move into my rules
report at this point in time. As, under Tab 2,
which is the Division Director's Report, Letter
A, the -- under Tab 2 you'll note in your
council agenda, we have the most current rules
report.

As we'll go through these, the first two
are application for device manufacture and
application for limited prescription drug
veterinary wholesale distributor permit. Again, those are under development right now inside of our office. We're trying to finalize the language for those and we will be moving forward with the development once we get the language finalized.

On 61N-2.018, the application for restricted drug distributor blood establishment permits, I'm happy to note that we have that noted as submitted for rule adoption, but that is actually effective today. So it is officially adopted and we can put that as one more that's going to the green list that's behind this.

The next ones are 61N-2.019, the restricted drug charitable organization and the 2.020 application for restricted drug distributor destruction permit. Again, those are noted right now as responding to the JAPC letter. We did respond to that letter.

In addition, we have been able to resolve those items with the Joint Administrative Procedures Committee and I'm happy to report that we've asked for certification from the Joint Administrative Procedures Committee and
anticipate filing that for adoption with Department of State when we get back tomorrow. So, again, moving forward with those two items.

The next three on the application, again, the 2.021, 2.022 and 2.023 are application for restricted drug distributor government programs permit, our restricted drug healthcare entity permit and our restricted drug distributor institutional research permit.

Those are also -- the language is under development. I am happy to say that we have the language pretty much set for those and will be able to start moving forward, but we have not moved those just yet, but the language inhouse is pretty much ready to go.

The next one on our rules report is 61N-2.024. Again, that is our application for restricted drug distributor reverse distributor. And, again, I'm happy to report that we have resolved all items with the Joint Administrative Procedures Committee and asked for certification so we can file those when we return to the office on Friday. So that one, as well, will be moved for adoption and complete.
Our 61N-2.025, the application for retail pharmacy wholesale distributor permit. That is, again, the language for our application is under development, but I am happy to report that we have got most of that draft finalized and we're simply waiting to move forward with that through the process.

The next one is your 61N-2.026, the application for third party logistic provider. Again, that one is one that we have noted on your report as responding to a JAPC letter. I'm happy to report we filed response to that and Dinah has already provided a request to JAPC to certify that for adoption and anticipates filing that for adoption with Department of State on May 11th, when we return, tomorrow.

The next two on the list, the application for veterinary prescription drug retail establishment and application for veterinary prescription drug wholesale distributor permit. Again, those are under development, but I am, again, happy to say that we have got most of the language finalized for that and it's in its final stages before we move forward with the rulemaking process.
And so we look forward to giving those in the process and moving at the next council meeting.

And then the final ones on your list, the 61N-2.029, the application for change of mailing address. We have that noted as submitted for adoption. I am happy to say that that is effective today. So, again, that one is complete and adopted.

The application for name change is in the same status. It is actually been provided to Department of State and has an effective date as of today, as well as the application for physical location change. So those are all effective today and adopted.

And then the final items for us, as noted, 61N-2.032 and 2.033, the application for certificate of free sale and application for certified designated representative. Both of those are adopted and effective.

So we'll have quite a few of them moving from this report onto the larger list of those that we've already approved and adopted. And so, with the hard work of specifically my staff, but I want a special thanks to Ms. Dinah Greene
for all of her efforts to move those through the system.

They take a lot of steps and she's done a great job at manning the helm on those. So a big thanks to her.

So we are getting very close to our final goal, which is to have all our applications adopted and complete and inside of the Florida Administrative Codes. So that's going to be a great accomplishment when we get that done.

So, again, a thank you to all the staff, but especially Dinah. And I recognize our Office of General Counsel staff, including Ms. Robin Smith, who does a lot to review these things as we move through the process.

So with that I'll turn it over for any questions or concerns that you may have as far as we've got with the rule development or the report as provided to you.

Hearing no questions, I'll move forward with the Director's Report. At this point in time, we're going to go to Letter B under Tab 2. And that is going to be our presentation from the Bureau of Education and Testing regarding our certified designated representative.
I'll turn it over to, again, the Chief of the Bureau of Education and Testing, Mr. Andrew Janecek and his staff member, Alex Bosque, who is our test development person inside of the bureau.

So, again, gentlemen, thank you very much for coming down today and we'll look forward to a good presentation.

MR. JANECEK: Good morning.
UNIDENTIFIED SPEAKER: Morning.
UNIDENTIFIED SPEAKER: Good morning.
MR. JANECEK: Well thank you so much. It's good to see you all this morning. I think this is my first time with the opportunity to visit your council, so thanks for all you do and thank you, Director Winters, for providing this opportunity.

Ms. Dinah, are you going to click for us?

MS. GREENE: I am.

MR. JANECEK: Okay. Perfect. We can go ahead and move in.

A quick overview of our bureau. Again, I'm Andy Janecek. I have the privilege of serving as the Chief of Education and Testing for DBPR. We are a service bureau within the Department so
we serve your customers and your candidates, but we also serve you.

So we help you specifically with the development and maintenance of your CDR examination. And then we monitor the contract with our outside vendor, Pearson VUE, to actually administer that examination to candidates.

Aside from that, we do a lot of things within the Agency. We serve the divisions of real estate; certified public accounting; drugs, devices and cosmetics; and, a number of professional boards and regulatory bodies within the Division of Professions. Everything from the asbestos licensing unit to the Board of Cosmetology down to the Board of Veterinary Medicine and everything in between.

Our bureau is established in 455 of Florida Statutes and we've been charged with assisting the divisions and the boards and the bureaus with protecting the public. So we do that by working with you to make sure we have strong and measurable examinations.

Within our bureau is the Examination Development and Administration Unit, that's
Alex's shop. That unit, again, is responsible for developing, maintaining and scoring examinations. We ensure that the examinations are valid and reliable.

These things can be challenged in court, so we want to make sure that they're strong and that the content is well-maintained. We also want to make sure that your licensees, your candidates are meeting those minimum competency thresholds.

This unit schedules candidates, we report grades, we conduct post-examination reviews. A number of the professions allow failing candidates to review the questions and answers that they missed to better prepare them for when they take the exam again.

We manage the examination administrations themselves. Most of our administrations are now handled through computer-based testing at Pearson VUE test sites. However, we still have a few professions that use a paper and pencil format and we administer those exams throughout the state.

We also monitor the national examinations and contracts. And in this case, the contract
that involves CDR or the CDR exam is a contract with Pearson VUE for the administration.

I think I covered this slide already, but, again, we assisted, back in 2011, when the -- when your program was transferred from DOH to DBPR. We helped with that implementation. We also work with you to provide ongoing maintenance for your examination items.

We publish a candidate information booklet on the website and keep that up-to-date. That helps candidates understand what to expect when they schedule their exams. It also includes a content breakdown so they know which areas to study.

Again, we defend those examinations when challenges arise. And we really, overall, just do our best to make sure we're meeting your needs and helping you all meet your objections.

I mentioned our partnership with Pearson VUE. We do hold a contract with Pearson VUE, which is an international testing provider. They do not actually handle any of the content for your exam. That's handled inhouse.

We're fortunate here in Florida, I think, our bureau might be the only -- the only state
agency in Florida and probably one of the few
remaining throughout the country that maintains
an inhouse psychometrics program. So we're very
proud of that. We handle a lot of the updates
and maintenance to the exams right inhouse.

So go back one more time, Ms. Dinah,
please.

The nature of that contract with Pearson
VUE really picks up after your office approves a
candidate for the CDR exam. So once that
candidate is approved, an authorization file is
sent overnight to Pearson VUE. Pearson VUE then
contacts that candidate and lets them know that
they're eligible to schedule an exam through
their test sites.

So they -- at that point they are customer
service for your candidates. Candidates will
contact Pearson VUE directly or go online,
contact them by phone, and actually make that
reservation, choose their testing location and
choose an available date and time.

Pearson VUE registers those candidates.

Pearson VUE provides grade reports before the
candidate leaves the test site, which is very
nice. And Pearson VUE also helps us with
examination reviews.

You'll see there at the test site map, there are a number of test sites in Florida. And this is where our partnership with Pearson VUE becomes very special. If we were still administering this on our own, it would be very hard to have that many test sites in Florida.

And this is just Florida. Pearson VUE has test sites all over the country and beyond. I recently was speaking with a candidate -- I don't believe he was CDR, but a candidate from Ontario, who was testing right in Ontario. So that relationship is very helpful.

All right. Just to give you some volume numbers -- I know it's hard to read on the screen -- our program with Pearson VUE is divided into separate programs. So we've pulled out our largest -- our largest testing bases. That's electrical, construction, real estate. Those kind of stand alone in their numbers.

You can see -- and it's a little small for me, but we go into the tens of thousands of exams administered for some of those professions throughout the year.

The block you see in the upper left that
says Professions, that's basically everyone else. So that includes CDR numbers as well as barber numbers and cosmetology numbers, auctioneer numbers, other professions that have exams administered by the Department.

So I just want you to see that we are actually -- we're pumping out a lot of exams each year.

This slide shows you some numbers specifically related to CDR between 2014 and 2018. You can see your candidate counts. You can see your pass and fail rates. You'll note that that's divided by first-time test takers, then folks who take the test more than once and then the overall statistics.

I will say, a lot of times the pass rates can be alarming. When you see that -- if you look in 2018, you've got an average pass rate that's below 40 percent. And that can sometimes be alarming.

But one thing we did notice, particularly as we transitioned more of the exams to a computer-based format and made them a little bit more accessible, we see that people tend to take them before they might be ready to kind of prep
them so they know, you know, what to look forward to.

So when we were doing an exam, for example, if we use construction, the old version of the construction exam was administered six times a year and that was it. So I think you saw, at that point, that a lot more people would wait until they knew they were ready and then they would go take the exam.

Through our partnership with Pearson VUE, you can take the exam one week, reschedule it, take it again the next week. It's much more frequent and it's available more often. So we see that candidates will tend to go in kind of before they're ready to get a feel for it.

And so sometimes that pass rate may go down because of that. There's a number of reasons, but I will just say, you see that low number, don't let that on its own worry you necessarily.

Out-of-state testing volume. Again, it's really great to us that Pearson VUE provides us with the opportunity to test candidates out-of-state. If they're prepping to relocate to Florida or getting involved in operations within our state, they can actually test from
where they are.

So this is just a breakdown for you so that you can see how many people in 2017 actually took advantage of out-of-state testing. For electrical and construction, you know, the industry is up and folks are coming to Florida, so you can see that there was a relatively high percentage of those folks testing out-of-state.

This one's a little tight. This shows you the out-of-state testing metrics for the CDR exam. It looks like the highest there might be Tennessee, you know, so you can see that even with CDR you have folks who are taking this at sites outside of our state -- state boundaries.

In military testing volumes, we're very pleased, at the Department, to be able to provide service to members of the armed forces and folks coming out of military service.

So Pearson VUE actually makes available testing locations on military bases and within military facilities. So we're very proud of that. You can see that, for some of our programs, I don't believe CDR has gone this way yet, but we've had military members taking our examinations in Japan, Dubi, Qatar, Bavaria.
all over the -- all over the globe they're
taking Florida exams to prep to get -- to get
into our state, rather. So that's a very nice
thing.

I don't believe any CDR candidates have
taken advantage of this yet, but Pearson VUE
even has a testing facility on the USS Abraham
Lincoln. So those folks can actually go to a
test site on their ship and take a Florida exam,
if that's what they need to do. So that's a
nice thing to offer.

With that I will go ahead and introduce and
pass the mic over to Alex Bosque, who's the
manager of the Examination Development and
Administration Unit, to give you a little bit
more specifics about the history of your exam
with DBPR and where we would like to see things
to in the future with your help.

MR. BOSQUE: Good morning. It's a pleasure
to be here with you all. As Mr. Janecek said,
my name's Alex Bosque. I'm the manager over the
Exam Development and Administration Unit.

Just wanted to provide you a little bit of
history of the exam. What I have or the
knowledge that I have about the history.
I know that in 2003 the exam was developed by the Department of Health in 2003 and it was first administered in April of 2004. It's designed to be a laws and rules exam. It covers areas that may get someone in trouble or when they're handling the products. So it's pretty specific. The scope of the test is just the laws and rules and we'll see those areas in a minute.

It transferred over to us in 2011 and it was -- started to be administered by Pearson VUE at that point. Prior to that, I believe, they were using Prometric for the Department of Health, but the history I have is that it was delivered via computer-based testing also.

There's some indication that initially, maybe in '04, it was paper and pencil every other month, but haven't been able to verify that a hundred percent. But the maintenance they did on the exam is similar to us.

They had -- they had an annual exam review and update and they followed the same psychometric or exam development procedures that we would inhouse and that transitioned to us.

The model we use for your exam is we review
the exam yearly, look to see how the questions are performing, but an actual subject matter expert review, unless we see something out of the ordinary, takes place every 18 months to two years and mostly because of the volume that you're -- that you're dealing with.

The last update that we had for your exam was in October of 2016 and that went into production October 2016, about six -- we worked on it for about six months prior to that.

Before we talk a little bit more about the exam, let's look -- if we can see our slides -- my eyes -- I'm getting old. I'll be 53 this month, so I'm a little bit taxed there.

But the score that you have to get on the test is 75 percent. There's 40 scored items on the exam. And that means you have to answer 30 questions correctly and the candidates are afforded 90 minutes to take the exam for the 40 questions. It's currently a closed book examination or they don't take their reference with them.

Those are the area -- the content areas that we're currently covering and the percentages. And if you go to the next slides,
it shows you the areas of law that we're covering and it's -- and it's fairly specific. So I've been told by our exam development person that the -- and our research associate, that this exam -- the questions are pretty complex material, but considering that we publish the information in such specificity, it's a little surprising when Mr. Janecek talks about the pass rates that we see.

See them in the 35 or not even 40 for the -- for the first time test takers. I would hope that candidates are preparing a little bit better up front. So I have some thoughts on that.

First, we want to make sure that our exams that we put out are, you know, balanced and proper and reliable and we're confident that that's the case. So then we want to see, well, why aren't the candidates performing as well.

And some of the suggestions we -- that I have -- we'll go to the next slide here, which is -- we're going to do a review again of the questions in the fall of this year. What we -- what I've noticed over the years is that it's just left in the hands of our team and we have a
little bit of trouble recruiting subject matter experts or folks that actually hold the certificate.

So we'd like to see if the Council has any thoughts on helping us recruit some folks either from the Council or certificate holders that may want to participate in reviewing the questions.

Another thing we've done recently is up -- we've updated our candidate information booklet. It's not a major update, but what we did is that we made links to the laws and rules so they don't have -- the candidates don't have to go search for them.

And in addition, it's not up on the web yet, but we're -- our research associates compiled all the laws and rules that we're covering into one booklet in a pdf that candidates can pull up off the web so they don't have to go out to the federal code and the Florida code and try to find them themselves.

They're going to be able to pull it up and I'm hopeful that that will be a source that they can use to study. That's on our Bureau of Education and Testing website. It'll be linked through your Division's page.
But we want to make sure it's visible and we have to -- we're going to put some thought to see that that information gets out there to the entities or organizations that are looking to have, you know, folks get the certificate and pass and work.

So we'd like to see some thoughts on getting that information. I think that component, then getting the candidates to prepare properly is probably key.

We do notice the behavior that was described before. The fee to test is about a -- it's $50. It's not very much. Candidates, they're busy they're working, they just jump in there to see what it's like and a lot of times they haven't done the preparation.

And I know that sounds like deflecting it to the individual, but they do have some responsibility to prepare and we notice this not just in your profession. The landscape architects, we were talking about their exam. They used to have to reapply if they failed our Florida portion. That was done away with. They pay much less.

Those students have taken a national. They
study a whole lot. When they come to our exam, 
they're like, I'm just going to pay the -- I 
think it's about $20 or so that they have to pay 
to take the test. And we notice that the pass 
rate had gone down just because of the behavior 
that they saw, well, if I fail I don't have to 
reapply, I can just go and pay another $20 and 
retest.

So not only do we want to get more 
involvement from the Council and from some 
certified drug representatives, but we also want 
to try to get them this information of the 
candidate information booklet and the laws and 
rules. Make it as easy for them to prepare for 
the examination.

And with that said, the exam is, you know, 
is the Council's, so we're also -- that's key. 
Any involvement or anybody -- I know you all 
have busy schedules, but anybody that there's 
not a conflict of interest with what you're 
managing, we're more than -- more than welcome 
to assist us in the review and we can set that 
up through Mr. Winters' office.

So we're open for any questions if you all 
have --
CHAIR MAYS: Any questions from Council members?

MR. MONE: Mr. Chairman?

CHAIR MAYS: Mr. Mone?

MR. MONE: So when you give 90 minutes for 40 scored questions -- 40 scored items, how many people actually use all 90 minutes?

MR. BOSQUE: I don't have that information. I can get it for you. I suspect that not many do. Usually most candidates finish about a half-hour early. Forty scored questions they -- they could finish under an hour, I mean. But I can get you the information.

MR. MONE: So and a couple other things. So have we ever thought about how robust is the item pull?

MR. BOSQUE: We have about 250 items available.

MR. MONE: Two-hundred-and-fifty scored items?

MR. BOSQUE: Yes, sir.

MR. MONE: Okay. Do you have any in pretest?

MR. BOSQUE: No, we're not currently pretesting any. We haven't written any.
MR. MONE: So do you ever --

MR. BOSQUE: Well, let me --

MR. MONE: -- ever put any pretest items in the examination?

MR. BOSQUE: No, we have not. Not since we took it and both in the practice of health was not either we would -- we kind of rate the -- if we -- this last go-round there were a few new items, but we kind of rated the difficulty of the item and put it in production and then took a look to see how --

MR. MONE: How it scored?

MR. BOSQUE: Right. Yeah.

MR. MONE: How it performed.

MR. BOSQUE: Yeah. It's -- I mean we do have enough candidates if we -- if we wrote a significant amount of new items we could -- we could do the pilot testing.

We do do it in other -- in our other exams, but we haven't done it on your exam.

MR. MONE: Have there ever been considerations to increasing the number of items? So when you've got 40 scored items, you can only get 10 wrong, right?

MR. BOSQUE: That's correct.
MR. MONE: Have we thought about increasing the number of items given -- and you'd have to do the study to figure out how long they take to perform on each item, but you might be able to make some new metrics associated with increasing the number of items, thereby decreasing the sensitivity of each item.

Because I went and did the math. So you've got 11 items on -- you end up with 11 items on product integrity, 10 on records, five on inspections and then they work their way down in terms of the number of items.

So are we able to do an analysis of how many items in each of these categories we have to know what items we need to write to so that we might be able to increase the number of total scored items, add some pretest items and decrease the sensitivity of any person missing one -- because the significance of missing one or two items becomes -- is truly significant on a pass/fail basis.

Have we thought about doing any of that?

MR. BOSQUE: We have not done it, but we can certainly explore it for you. We -- pretty much the exam is as it was developed by the
Department of Health with the 40 items and because of the limited resource of consultants we haven't really looked if there's any other areas that need to be covered or expanding.

But we can certainly get you a breakdown of the pool and the number in each content area.

The other thing we could do is, you know, we could do a cut score study and see if -- your test, we don't scale it. It's a straight 75 percent. But we could look to see and adjust for difficulty in that way also.

I'll leave it -- in a nutshell that's how the -- what we could do. But I'm pretty sure, just like a lot of the certification exams, the Department of Health, they didn't go through a cut score. They just picked 75 percent.

If we could -- if we could scale your exam, we could probably look at the forms and adjust for the difficulty that way. What I'm saying there is, the raw score on -- are we -- we put out the forms and they're pretty close in difficulty, but one may be slightly more difficult than another.

So we can -- we can adjust it by scaling a score and a scale is more like when you take an
SAT or some of the other national exams you may be familiar with. They report it out on a scale, but you never know exactly how many questions you needed to answer.

We may have one of your test in production that you -- that you have to answer 29 questions and that's a pass. Another one may be a 30 or a 31 overall or lower. I mean we do that for some of our programs.

So but those are some good ideas that you're suggesting. I'm not sure increasing the number of items completely adjusts the difficulty 100 percent, but it could -- it could help a little bit.

We can also, if anybody's interested in coming, we can show you all the -- we have statistics on each question and there may be some that you all -- even though they're good questions, you may think that they're too difficult.

It's also a challenge when you're doing the laws and rules to come up with a robust item bank because some of the areas are -- I'm not as familiar with your actual areas, but there's only so much you can write from an area. So
those are some challenges.

   But we welcome the opportunity, definitely, to make -- to make improvements.

   MR. MONE: And I will apologize. I had volunteered to do this and my time got away from me, but Drew and I talked --

   MR. BOSQUE: Yeah.

   MR. MONE: -- and I'll find a time to come down and work with you all on some of these thoughts. -

   MR. BOSQUE: Our pleasure. We'll get it prepared for you and we'll get all the statistics and we'll get the counts of the item bank and the, you know the content area, where each one is classified to, and let you look through it and that's really -- from the history that I saw, it's been some departmental folks for the most part, even with health.

   They initially may have had some input, but so that's no excuse, I mean, but --

   MR. MONE: And if you would, send me the confidentiality agreement before I come look at it because if Renee wrote it, I really want to make sure I read it carefully.

   MR. BOSQUE: It's only a one-pager, so, you
know --

MR. MONE: Okay.

MR. BOSQUE: But I think with your -- with your ideas, Mr. Mone, and some of the inputs and putting some of this information out -- I've observed that since it came over our department -- I can only speak for DBPR, but it seems that the information booklet and the laws and rules are a little bit buried and maybe candidates aren't finding them.

So just maybe if we can do an outreach to the -- to the industry and get that out and that would be -- that would be another step.

So in combination we can, hopefully, see the, you know, more certificate holders that get out there and working.

Now maybe some of you are just as happy that they're not. You know, there is a point to the exam that we want them competent. So, you know, at a certain point it is what it is, but we do want to improve.

So definitely.

MR. WINTERS: And, Mr. Chair, well, actually, I'll defer to Renee real quick. I know she wanted to --
MS. ALSOBROOK: Renee's chomping at the bit because I'm the one that goes out and investigates the competence of these CDRs.

In 2016, I as well as one of my inspectors who is a CDR, and Division Director Dixon, were integrally involved with the revisions that occurred in October of 2016. So the exam at that point was quite old and the questions were quite old and the chapter -- the statute had changed multiple times and the examination booklet was quite old.

So I think that the current test and the examination booklet is much better than it was, but obviously needs some work. The key, however, to the testing questions is what happens in the field and what we find as violations.

So regardless of what you decide you want to do with the questions, please be mindful of what actually happens in the field. And most of you are involved with wholesale distribution and you're quite cognizant of what goes on in the business.

Be mindful of what, however, we're finding as violations. Many of these CDRs are not
located in legitimate companies who want to do right. They're hired by illegitimate companies who don't want to do right. And they want these CDRs to be there just so they can get a license.

And we find that in multiple, multiple cases where the CDRs aren't present, they aren't in management positions and they are not educated enough to control the businesses or provide education and consultations for the business.

So it is very, very important that the CDRs who achieve their registrations through this testing actually do know what's going on in these businesses.

And as was indicated by the division director and Alex, you saw, it's not many rules and laws to read. I mean it's a couple little sections of 21CFR and Chapter 499. So if you can't get that, how are you going to be able to provide the consultation, etcetera that are required of a truly legitimate wholesale distribution business?

It's the difference between being a drug dealer and a prescription wholesale -- a prescription wholesale distribution business.
So that's the purpose of the CDR as articulated in the statute when they were put in place.

So just be mindful of that when you adjust these questions up and down and you reduce the number of questions that you have in certain areas.

MR. WINTERS: And, Mr. Chair, I want to take a moment now that I've given her a chance -- Renee a chance to make sure she got her statement in.

I wanted to address a couple items that I think is important because I think that we've got kind of what I would call a two-front item. One of the things that as the division director and working with the Council that I've wanted to do is to ensure that the testing, the material and other items is up-to-date.

And, two, that we're doing what we can to improve the administration of that test. I think our Bureau of Education and Testing does lot of great strides to work on our tests and to work with a very good company, Pearson VUE, as you saw, to provide the test in multiple locations so that they have an opportunity in a wide range of areas so that access is there.
The next thing is just to ensure, as we've worked on -- we've worked on the booklet to make sure it's improved. Website updates. And we'll continue to make sure that we address those.

One of the other things we've done is to try and remove some of the items that we thought were causing concern inside of the industry that, what I would call unnecessary items where we've expanded. And I'm happy to say that, as we talked with the Council previously, that to expand the amount of time someone has to take and pass the examination. That has been implemented as of April.

We have gone ahead and extended from six months to 18 months so people are not spending a lot of time just trying to reapply because they weren't able to complete and pass it in six months.

We found that it, again, the benefit just didn't outweigh the general cost, so we moved that to 18 months, giving them three times as long to pass it. And that is in place. So anybody that applied for and has been approved for the exam as of April 1 will have 18 months.

So, again, some just general improvements
as far as the administration of the exam.

I think the other point that we've made and I think Councilman Mone made a great point, and made -- had some great questions. And I think the -- it just brings to the point that, with the help of the Council and some additional expertise, that, again, we can start bringing a little bit into focus those questions.

I think that Alex said, and just to kind of put a point to it, we have a lot of data that can be used and brought to bear on an improvement to this exam. And hopefully, as you said, with some of those additional ideas that we can take that data and make a much better examination.

And we welcome that opportunity. And I know with the expertise that Mr. Mone brings, I think that that's going to be great. I think that what we have seen is that we have a great bit of expertise inside of our staff with the help of Chief Alsobrook, our inspectors that are on there. Dr. Vu would be one particular, I believe, was involved quite frequently.

And they brought a lot of great expertise,
additionalexpertise on the other side that's inside of the industry. And that's going to be a welcome addition.

So, again, I think that with that kind of moving forward I look forward to it and I think that our staff, when we go to having Mr. Mone come, is going to bring that to bear. And then we'll be able to also reach out.

When we do go for the further examination overhaul that's coming up in the fall, if we can identify some additional individuals it would be helpful to bring in. Again, they will have to be able to sign confidentiality agreements, but to let them come in and give some more industry input, along with our current staff to, again, allow that.

I think we're going to see a much better improvement of the exam. So, again, we welcome that. So.

CHAIR MAYS: Go ahead, Mr. Phillips.

DR. PHILLIPS: Thank you.

So I understand that the testing time is 30 days if the -- if the candidate fails the original test to retest, correct?

MR. BOSQUE: That's my understanding, yes.
DR. PHILLIPS: So any consideration, I guess from an integrity standpoint, so that the candidate isn't just taking the test multiple times just to be able to pass it after taking it a few times of extending that time.

Or is that a standard -- do you know if that's a standard across all tests? Maybe to go to 60 days or 90 days.

MR. BOSQUE: It's not a standard. With a test like this it's kind of common practice. Some would say that 30 might be a little bit too long of a wait, just because they -- the time that they take to be, you know, certified and get their certificate.

The 30 days -- the thought behind it is that they -- it limits our exposure of smaller item pool, but also candidates do take some time to prepare. Extending it, I'm not sure, would have any positive or negative effect.

So we -- it varies from program -- some programs they can test within two days. And, again, that behavior is not -- our real estate candidates do that, but, you know, if they don't change anything in their -- in their preparation process, then we see that they're not
successful.

So I wouldn't say that model's good. But I think 30 is sufficient time behind it. If they do -- one thing we didn't mention is that your candidates -- it was brought up on one of our slides -- but they can review the examinations Florida provides in their statute and rules for that opportunity.

So that's one thing the candidates can take advantage of. And if they do review that, that extends the period a little bit longer. They have to wait 21 days to test again. So they may fall within the 30 or a little bit beyond that.

But that's another thing we can add to our -- to our information to make it a little bit more visible to them. It is on their fail score report. It does say that they can review. But, again, I'd have to find the numbers for you to see how many of your candidates are taking advantage of that.

MR. JANECEK: I seem to recall we looked and it's a low number --

MR. BOSQUE: It's a low --

MR. JANECEK: -- requesting reviews --

MR. BOSQUE: Yeah. Right.
MR. JANECEK: -- of the exams.

MR. BOSQUE: So it could be that they're not interested or they're not aware of what it is, but they would see -- in a review they would see the questions they missed, along with the correct answer.

And then, you know, I'm not telling -- saying that they should learn the exam, because they're not going to see the same test again, but it gives them an opportunity to do that. And it also gives them a chance to challenge any questions that they -- that they feel that their answer is correct and that we're not.

But we haven't had any -- we've had very few challenges via the review process. But that's another opportunity.

To answer your question, I feel 30 days is sufficient and usually it's asked the opposite way, not wanting to extend it. I think extending it would just slow down the certification process and it's not going to change -- I doubt that it would change their behavior or improve the performance, if that's where you question's --

CHAIR MAYS: This is Steve Mays. I think,
probably to your point, I'm sure there's
probably distributors where maybe they only have
one person that could meet the qualifications to
take the exam, especially a smaller distributor.
So I would think they would want to accelerate
that time, if anything, to try to retake that
exam.

MR. BOSQUE: I think you're at a -- you
know, that's really up to what you all -- I
think you're at a good spot with that 30 days to
let them see that they, you know, prepare and
take it seriously and get their certificate.

To shorten it may encourage them -- more
behavior that's not conducive to -- either
they're trying to learn the exam or so forth. I
think -- I think the 30's a good -- especially
since we've extended it to 18 months that they
can -- they can take the exam.

DR. PHILLIPS: I think the only reason I
mention that is because, at the beginning of the
presentation, you mentioned the number of people
who might have -- who might be taking it and you
might see lower or increased failed rates in the
beginning just because they're testing the exam.

So in this case, by having a longer period,
it forces them to really want to pass the first time.

CHAIR MAYS: Any other questions from Council members?

MR. HART: This is Peter Hart. I'd like to defer over to the enforcement side of this. Do you see that 30 day timeframe showing up as an issue?

MS. ALSOBROOK: Councilman Hart, I don't. I think the 30 days is a good timeframe. I think what we need to look at is, is the exam too hard. And when Council member Mone looks at I think we'll have a good idea if it's too hard.

MR. WINTERS: The other thing is, just from a -- the Division side, I have -- unless they're contacting directly Bureau of Education and Testing, in talking with a lot of the candidates for the CDR exam I have not heard, in the timeframe that I've been here, and I haven't received any information from our processing manager, Rebecca Burnett, that we're getting any particular kickback on that 30 days.

So I think that right now, based on the information we've got, I think the 30 days is a
good number. It seems to be, obviously, the integrity is maintained. We're not seeing a massive jump on the second time takers and we're not receiving a lot of reports that people are being prevented from taking the exam and causing problems.

Like I said, I got much more calls on, okay, it's been six months, what do I do now. You know, how do I do this and I've got to submit this over. That was -- that was more the call that we were getting, which is one of the reasons why we focused on that, to get that process improvement.

But, again, as Renee said, and what I'm saying is, that number seems to be overall working and we don't -- like I said, we're not seeing an item on either side that would kind of raise that.

Although, again, as Dr. Phillips mentioned, you always take into consideration the integrity of the test based on the timeframe between testings. So, but, again, I think we're looking right now, based on the information, everything is generally good with that number.

CHAIR MAYS: Any other questions from
Council members? Okay.

I just -- this is Steve Mays. I, you know, I'll preface my remarks by saying I've never taken the exam before. I've been in the industry over 40 years and I would be very interested in taking a look at it and being as helpful as I can be personally, because I would really like to take a look at it myself.

I do -- I have -- I have some mixed feelings. I think that, you know, we want to make sure that the people that are representing distribution centers in the state are -- that are permitted in the states know what they're doing and they understand the rules and the statutes.

I think, on the other hand, I look at a lot of these people -- my concern more about the pass/fail rate is kind of alarming to see that many failures. And it's not so much that maybe the test is too hard, but I'm concerned that, you know, typically these people are still going to be in there operating that business, even though they didn't pass the test and maybe someone else has to be the CDR.

So I think the education part of it is just
as important and, you know, I know -- I know --
and I don't really have a problem with the 75
percent or the number of questions. I mean we
take -- I take exams all the time with my
company internally. Code of ethics exams and a
lot of other things. And you're typically have
to go through some extensive training first and
then you've got to basically past up to 90
percent of the questions to pass.

So, having said all that, I think I
understand, too, you know, from looking at some
of our folks, they're typically a, you know, a
distribution center manager and they've got a
day job they've got to do and they've got
families to go home to and they're not
professional -- they're not professionals and
they're not full time students.

So I know it's difficult for them to do a
lot of the in depth studying. And I'm not
making excuses for people that fail the test,
but I think it would be good, you know,
especially for Mr. Mone to take a look at it and
make sure that we've got -- the questions are
real world questions in how to, you know,
operate a pharmaceutical distribution center in
compliance with the laws and statutes and in a real world.

And, you know, I think that if it's fair I don't, you know, we want people, you know, our bottom line is we want to have a safe and secure supply chain and we don't want to have issues out there with bad players that are -- that are representing distribution centers and operating them.

So, having said that, I'll open it up to questions from any interested parties on the line.

Any other -- any other questions?

Okay. Okay. In the back. I'm sorry.

Could you identify yourself.

MS. HARTSFIELD: Yeah. I'm Shannon Hartsfield of the law firm of Holland and Knight. I was just curious, is the pass rate for this exam very different from a pass rate of other professions? Are there -- is this one anomalous in any way? Or are the -- are the pass rates much higher from most other professions?

MR. BOSQUE: Slightly lower. I wouldn't call it -- call it an anomaly, but it's -- we'd
like to see a little bit better performance.

MS. HARTSFIELD: Is it the lowest one or are there other professions that have lower pass rates?

UNIDENTIFIED SPEAKER: We may have to look, but --

MR. BOSQUE: I'd have to look. I'm pretty sure it's not the lowest. We don't -- it's in the ballpark with the -- with a few others. But most of our exams are 40, 50, 60 percent for the first time test takers.

So what we want to do is what Mr. Winters said. We want to make sure that the forms are -- we aren't setting the difficulty level too high, that the material is appropriate and that, no one test is any more difficult than the other.

And then, from there, we'll see how the pass rates improve the -- I wouldn't call it an anomaly either. It's --

CHAIR MAYS: And I did have one more question.

Do we provide -- and, again, not seeing -- not having seen any of the materials before, the booklet or anything, do we provide -- does the
Department provide a study guide of sorts to the -- to the applicant?

I think -- I mean I would recommend that we do that covers all those different areas of the rules and the statutes. Where they, you know, something that's not too extensive so they could understand, you know, these are the main things that I need to really be concentrating on.

MR. JANECEK: That's where that candidate information booklet comes into play. It does provide some details there. Now Alex did mention we did recently create the laws and rules book that can be downloaded.

And our thought was, if it's all packaged in one nice pdf --

CHAIR MAYS: Okay.

MR. JANECEK: -- it may be more accessible to them than having to go find all those resources separately. So that is available now, too.

MR. BOSQUE: And we can -- we can -- from Mr. Winters' office we can send out those -- those links to you all if you'd -- if you'd like to have them, especially the laws and rules.

CHAIR MAYS: That would be great. That
would be great.

I want to thank you two gentlemen for coming today. I think this has been a very helpful conversation.

MR. JANECEK: Well and it's just the first one. So we'll make sure to continue this on. We'll work with Director Winters to kind of build that team of experts so that we can give this a good, thorough review.

CHAIR MAYS: Okay.

MS. ALSOBROOK: You guys are great, but you do know the requirements of a CDR, right? That you know the business, you know the laws and rules, that you're a manager. You're not supposed to have to spoon feed them to pass the exam, Chairperson.

MR. JANECEK: I'm not touching that.

MR. BOSQUE: Thank you all for having us. We appreciate your time and look forward to working with you all.

CHAIR MAYS: Thank you. Thank you.

Mr. Winters, anything else?

MR. WINTERS: Not for the CDR examination. I think that we've hit that a good lick today. So I think it just shows we've got some work to
do, but obviously made some improvements and we're continuing to soldier forth.

And thank the representatives of the Bureau of Education and Testing, Mr. Janecek, Mr. Bosque. But with that I'll go ahead and move forward.

We've got one more item, specifically on the director's report, and that is to provide you a copy of House Bill 675 that has been enrolled and signed by the governor and is passed and is effective now.

Excuse me. It will go effective July 1 of this year and what -- I'm going to give you just a brief, high level overview of it to give you some of the main points of what it does.

It is a fairly short bill compared to some of the others we've reviewed so, again, it's not difficult reading. But just to start, the basic overview of this is that the House Bill did create a new Class 3 institutional pharmacy permit under the Board of Pharmacy.

And it did provide not only additional definitions under 465 with the Board of Pharmacy and specifically to those would be to adopt a definition of a central distribution facility...
and making that part of the Class 3 institutional pharmacy permit. So if there's a central distribution facility it would be a Class 3 institutional pharmacy requiring that permit.

It also adopted the definition of common control, which is on page three of the bill, which basically adopts a very similar definition to what we have inside of Chapter 499.

The first part that you'll want to look at, the main issue that I'll draw your attention to, is the Class 3 institutional pharmacy permit on page five of your -- of 15 of the bill, starting on line 78 of the bill as we've provided to you.

Again, that gives you the scope of work and the general licensing requirements for the Class 3 institutional pharmacy permit and the scope of that, which includes the -- not only to dispense but, in this case, the most pertinent part for our discussion, which is the distribution of prescription drugs that are handled through that pharmacy permit.

It also specifically is for preparation of prepackaged drug products, which is defined further on in the bill, which we will address.
that issue item shortly.

But what is does is that it creates that under the Board of Pharmacy. We had been working with the Board of Pharmacy to determine just the normal adoption process, their implementation of this and the items that they're going to require of the Class 3 institutional pharmacy applicants in order to do that.

And then working with them as far as development of how they're going to develop that permit. Because, in this particular case, this permit is within their purview. While we have commensurate permits on our side that currently exist, the Class 3 institutional pharmacy permit will be under their development. So they do have the authority over its strictures and its development.

Again, the Class 3 institutional pharmacy permit, if you'll look, again, has several items of requirement that will be, again, implemented by the Board of Pharmacy that we will look at, including, specifically, recordkeeping, preparation, dispensing, prepackaging, transportation, distribution of additional drugs
for their recordkeeping.

Then also safe practices, requirement of a consultant pharmacist responsible for those services. So that will be handled by the Board of Pharmacy and their development.

Going forward from that the Class 3 permit, again, tracks with the Class 2 institutional pharmacy permit, which is currently already in existence. The difference here is that it will allow for distribution under that permit.

Moving forward to the next page, we'll -- I'll draw your attention to, which is on page eight. This is the 499 definitions and they have added a couple of items to the definitions.

Under 499.003(39) there's a definition of prepackaged products. That definition has been changed under this to allow for the prepackaging as defined in the statute currently. However, it adds in there that prepackaging that is conducted by a Class 3 institutional pharmacy permit.

And it also removes the restriction that those prepackaged drugs be held in the establishment in which prepackaging occurred. That is currently what is required. Now it will
allow them to be moved under the pharmacy permit under the Class 3.

The other item that you'll note is that under the wholesale distribution on page eight and beginning on line 190 to the bill, there is an additional exemption put into the definition of wholesale distribution.

And that is for a hospital that is covered under Section 340B of the Public Health Services Act under the federal statute that arranges for prescription drug whole distributor to distribute those prescription drugs to code entities, to act directly as a contract pharmacy.

And that would exempt them from the necessities to have a restricted drug distributor permit under 499.012(h).

Specifically what that means is that, if you have a current or potential governmental entity's permit under our restricted drug distributor, if they do not take possession of the drugs -- the 340B drugs, would rather use a contract pharmacy that's been approved through the HRSA requirements and is an approved pharmacy, they would not need the governmental
entity's permit -- the 54 permit as it's commonly referred to in our office.

But the restricted drug distributor, governmental entity's program, which was created to allow for the handling of those 340B drugs. So that would be to allow them, if they are contracting out, to not need that permit.

And, again, the addition, also, of the Class 3 institutional pharmacy permit is also added to a exemption from the wholesale distribution under the new subparagraph X that's noted on line 198.

The next portion that you'll want to look at is an exemption that's placed into 499.01. And I'll read it because it's a short paragraph. It says, "A prescription drug repackager permit is not required for distributing medicinal drugs or prepackaged drug products between entities under common control, which each either hold an active Class 3 institutional pharmacy permit or an active healthcare clinic establishment permit."

That's our HCCE permit, as we commonly refer to it. So, again, what it means is, is that if you meet the definition of common
control and you have both the Class 3 institutional and you're commonly controlled HCCE, you could move those drugs to those HCCEs. So, again, that is inside of the statute now.

And moving forward, there is also additional exemptions that are added. If you'll move to page 13-of-15, there's a item placed on line 278 of the bill which basically, again, mimics the previous exemption.

It basically, in its verbiage, says, "A restricted drug distributor permit is not required for distributing medicinal or prepackaged drug products between the entities under common control that hold the Class 3 or an active healthcare clinic establishment permit."

So, again, those entities that have the Class 3 or the HCCE would allow them to move those drugs from the Class 3 to the institution or the HCCE.

It does line out a previous exemption which basically allowed for prepackaged or a repackager permit not to be necessary in the event that you met certain criteria. And that criteria was provided in sub 5.

We did look at this. The items that -- in
this, again, the prescription drug distributor, they had to notify us within 30 days, they had to be under common control, much like the Class 3 and the HCC under the provisions that'll come into effect July 1 for distributing.

In the particular case, the prescription drug distributor had to meet good manufacturing practices under both state and federal law and that they had to maintain the state and federal recordkeeping laws for the labeling. Excuse me, the labeling requirements under both state and federal law.

That has now been pulled out of the statute, which means that in some fashion that there is more -- a repackager permit would now be required under those. However, the thought of these appears to be is that the Class 3 institutional would be the permit that they would seek if they were going to -- wanting to continue to do that.

For the record, we did research. There were -- we could not locate a substantial number of people that had notified us they were even using this provision. So that impact in and of itself, the removal, does not appear to be a
large impact.

I was posed the question and I'll go ahead and address it, which is, what is the general impact going to be on the Division.

Again, the main impact is going to be the loss of permits. Entities electing to go to the Class 3 institutional as opposed to using the current restricted HCE permit for the healthcare entity.

So that would be the main impact. This -- the other impact would be permits in the repackager permit and the governmental entities permit. Again, the potential to see reduction in those permit types as people elect to use the exempting language.

How much or how many people will elect to do that is unclear and so we have not put a specific number on that, only to indicate that it is an indeterminate impact. How substantial it will be, we'll wait and see.

We have implemented reporting to make sure that we monitor that for its progress over the next several years so we can keep an eye on it. And, like I said, we're looking to those items to ensure that we at least maintain those.
The other thing is, is that it does now give specific distribution authority under a pharmacy permit that did not previously exist.

So, with that, I'll turn it over. That's, again, just a large overview. It does not get into the minutiae, but, again, we can -- if you have any questions right now we can attempt to answer those.

Or, if not, if at a later time questions come up, you can, of course, always contact me with the Division.

CHAIR MAYS: Mr. Mone?

MR. MONE: Mr. Winters, correct me if I'm wrong, because it's entirely possible I read this wrong.

The distribution authorization in the -- in the act is limited to those under common control and ownership. So it's only going to be those hospitals and those common controlled clinics; correct?

MR. WINTERS: That is correct. It is -- the language does limit it to that and it limits it to the entities that are holding the Class 3 or the HCE under common control. So those elements will be there.
The other part that I did not mention specifically and it is one to note, the regulation that currently exists -- the licensing permitting types currently does -- it remains.

So, again, people can maintain the current structure. It just depends on how many are going to move to that different type. So, you know, we keep that in mind. That's why it's in -- we can't determine the impact of it right now.

CHAIR MAYS: Any other questions from Council members?

MR. ELLIS: Mr. Chairman, this is Dean Ellis. I'm here.

CHAIR MAYS: Better late than never, Mr. Ellis.

MR. ELLIS: It's true. I thought I was early. Ten o'clock. I'm sorry. So sorry.

MR. WINTERS: Well, you know, the questions, like I said, again, as the Division's representative and the director's office, I'll let you know that, again, we know that as we discuss items on a council meeting that may come up later. If there's any requests you can
always contact me individually. If I can help
or provide additional information that will be
helpful, I'll be certainly -- we're welcome to
-- we offer that open door policy. So please do
reach out.

Other than that, that concludes my
director's report for the council.

CHAIR MAYS: Any other questions from
council members for Mr. Winters?

Questions from interested parties on the
line? Okay.

Is there any other business? (No
response.)

Okay. Hearing none, do we have a motion to
adjourn?

UNIDENTIFIED SPEAKER: Motion to adjourn.

CHAIR MAYS: Do we have a second?

UNIDENTIFIED SPEAKER: Second.

CHAIR MAYS: All in favor say aye. (Board
members responded.)

Opposed? (No response.)

The meeting is adjourned. Thank you.

(The meeting adjourned at 9:41 a.m.)
CERTIFICATE

STATE OF FLORIDA
COUNTY OF ORANGE

I, HEATHER K. HOWARD, Court Reporter, certify that I was authorized to and did report the aforementioned May 10th 2018 Department of Business and Professional Regulation, Drug Wholesale Distributor Advisory Council Meeting, and that the transcript is a true and complete record of my notes and recordings.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I financially interested in the outcome of the foregoing action.

DATED this 31st day of May, 2018.

Heather K. Howard

HEATHER K. HOWARD, Court Reporter
Notary Public, State of Florida
(electronic signature)

Commission Expiration: 06/17/18
Commission No.: FF 119444