

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

**DEPARTMENT OF BUSINESS AND
PROFESSIONAL REGULATION
DIVISION OF DRUGS, DEVICES AND COSMETICS
RULES WORKSHOP**

**MAY 10, 2018
1:00 P.M. - 1:31 P.M.**

**FLORIDAYS RESORT/ORLANDO
12562 INTERNATIONAL DRIVE
ORLANDO, FLORIDA**

**REPORTED BY:
HEATHER HOWARD, COURT REPORTER
NOTARY PUBLIC/STATE OF FLORIDA**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MEMBERS PRESENT:

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

COURT REPORTER:

Heather Howard, American Court Reporting

* * * * *

P R O C E E D I N G S

May 10, 2018

1:00 p.m.

(The May 10th, 2018 DBPR/Division of Drugs, Devices and Cosmetics Rules Workshop was called to order, after which the following took place:)

MR. WINTERS: All right. By my clock we're at 1:00. So let's get started.

Good afternoon, everybody, I'm going to call to order this rules workshop.

My name is Drew Winters. I'm the director of the Division of Drugs, Devices and Cosmetics and I'll be the moderator for this afternoon's rule development workshop.

For the record, we are here in Orlando Florida at the Floridays Hotel. It is May 10th, 2018 at approximately 1:00 p.m. We are here today to receive public comments and any suggestions regarding language for consideration in the development of Rule 61N-1.001 of the Florida Administrative Code regarding a potential definition for "solely administrative services".

Notice of today's workshop and the notice of rule development have been filed with the

1 Administrative Register.

2 For the record, this is a preliminary
3 workshop and no proposed rulemaking as been
4 noted at this time. The Division has also not
5 provided any preliminary language, but is
6 instead requesting industry input and assistance
7 during the initial language drafting to better
8 understand industry circumstances and business
9 models that should be considered in developing
10 any potential rule language.

11 It is important to understand that this
12 rule shop is, again, a preliminary step and will
13 not prohibit any future development workshops,
14 should they be necessary or requested by any
15 substantially affected party.

16 Any future rule language will be properly
17 noticed in the Florida Administrative Register
18 and proceedings will follow those development
19 procedures.

20 A few housekeeping notes for everybody and
21 some general rules to ensure we do have a
22 successful and organized meeting.

23 First, if you've not done so, if you could
24 please sign in on the attendance sheet, which is
25 located in the back of the room to let us know

1 that you were in attendance at this meeting.

2 Again, if you plan to speak, we have
3 provided testimony cards to help us know if you
4 would like to speak. If you could fill one of
5 those out. They are green-colored speaker
6 cards. And they are available next to the sign
7 in sheet. If you'd like to fill one of those
8 out, you can give them to Dinah Greene here at
9 the front and she will ensure that we get those
10 to ensure that everybody's recognized for their
11 public comment.

12 Next, because this -- it is not a big room,
13 but, of course, it does help both for the record
14 and for everybody to be able to hear, please
15 speak up and clearly identify yourself and your
16 organization if you're going to present for the
17 record.

18 The Division has arranged for a court
19 reporter to be available and she is located at
20 the end of the table. Please be mindful her job
21 is a difficult task and so if you could please
22 be sure and speak up and use the microphone
23 provided. That will help us keep the record
24 clear.

25 In addition, also, please wait to be

1 recognized before speaking so that we can assure
2 that all presenters are given an opportunity to
3 speak and are not spoken over.

4 Again, if you are following a previous
5 speaker and you agree with their comments, you
6 can simply identify yourself, the previous
7 speaker and indicate that you agree with their
8 comments. There's not a necessity to repeat the
9 same comment over. And then simply move to your
10 additional comments.

11 At the conclusion of today's workshop,
12 after we do adjourn the meeting, we will leave
13 the official record open for a period of 10 days
14 to allow participants to submit additional
15 written comments to the Division, either based
16 on what you witness today or if you have any
17 additional comments that you believe necessary
18 to provide.

19 You can submit those comments. It should
20 be received -- submitted no later than close of
21 business on May 21st, 2018 to our office and
22 received.

23 You can submit those by mail at 2601
24 Blairstone Road in Tallahassee, Florida. Zip
25 code is 32399. Or you can e-mail them to

1 Dinah Greene at dinah.greene@
2 myfloridalicense.com.

3 Both of those contact information are
4 provided in the Florida Administrative Registry
5 notice for today's meeting and the rule
6 development.

7 Finally, I do want to say, as the Division
8 director, I do appreciate your time and effort
9 to coming here today and providing your
10 comments. These comments will help us as we
11 move forward with potential development in this
12 area.

13 With that being said, I will go ahead and
14 outline just the basics of the rule request that
15 we're moving forward with today and then open it
16 up to our speakers to provide their comments.

17 Again, this particular rule is Rule
18 61N-1.001 of the Florida Administrative Code
19 containing the definitions and terms used in
20 this part.

21 The statutory provision that we're looking
22 to define is actually contained in 499.003 of
23 the Florida Administrative -- excuse me, the
24 Florida statutes. And that is the definition of
25 terms used in this part.

1 And specifically we are looking at the term
2 under Subsection 48 of that provision, stating
3 wholesale distribution means the distribution of
4 prescription drug to a person other than a
5 consumer or patient or the receipt of a
6 prescription drug by a person other than a
7 consumer or patient, but does not include, and
8 Sub (t) of Section 48, states, Facilitating
9 distribution of a prescription drug by providing
10 solely administrative services, including
11 processing of orders and payments.

12 The Division, again, is requesting public
13 comments regarding the potential definition of
14 "solely administrative services" and would also
15 is looking for comments to help us understand
16 any industry practices or business models that
17 could potentially be classified into this
18 category.

19 With that brief explanation I will open it
20 up to public comment at this time. So far I do
21 have one comment card so I will start with that
22 comment card. It's Ms. Shannon Hartsfield, the
23 company she's representing is Holland and
24 Knight. And she is here for, again, our topic
25 number two, which is what we've just opened.

1 So, Ms. Hartsfield, thank you for being
2 here today and we open up for the record.

3 Just a housekeeping note. I note that you
4 did submit a written item to us on May 4th in
5 anticipation of this meeting and that at this
6 time we'll ask you go to ahead and make your
7 formal comments and then also to hopefully move
8 this into the record and we can recognize that
9 for the record.

10 MS. HARTSFIELD: Thank you, Mr. Winters.
11 Yes, I'm Shannon Hartsfield with Holland and
12 Knight, representing a number of -- (moved
13 microphone) -- I'm Shannon Hartsfield with
14 Holland and Knight. We represent a number of
15 drug wholesalers and manufacturers.

16 And I do respectfully request that the
17 letter that I wrote on May 4th, 2018 to
18 Dinah Greene be entered into the record for
19 these rule workshop proceedings.

20 We appreciate this opportunity to provide
21 input and comment. A number of our clients have
22 standalone locations, what I would refer to as
23 call centers, that engage in marketing
24 activities and administrative services. But
25 there are no drugs held at these facilities. No

1 shipments come out of these facilities.

2 But currently, based on actually the
3 Department of Health's position and then it
4 carried over into the Department of Business and
5 Professional Regulations' position, it's our
6 understanding that they, in the view of some at
7 least, are required to obtain either a full
8 wholesaler or a manufacturers license.

9 For wholesalers this means that these call
10 centers have to have a full time CDR in a
11 managerial role, which is, you know, may not
12 make a lot of sense when there's no actual
13 storage or physical movement of drugs from that
14 location.

15 But we are definitely open to dialogue with
16 DBPR to understand things that could go wrong if
17 we don't have a CDR at those types of locations
18 where we don't want to create a situation where
19 we're increasing risk to the people of the state
20 of Florida if these call centers remain
21 unlicensed.

22 But we would submit that licensure as
23 wholesalers or manufacturers in these locations
24 probably isn't the best use of resources, either
25 for our clients or for the State.

1 In addition to the CDR requirement there
2 are other licensure requirements in Chapter 499
3 that don't really seem to fit for these sales
4 centers or call centers.

5 For example, on more than one occasion DBPR
6 suggested that it would not renew the license of
7 a call center. You know, a company that was
8 trying to do the right thing and trying to have
9 a license. Because it couldn't provide invoices
10 for that location for 12 wholesale distributions
11 in the previous year or three in the previous
12 six months.

13 This appears to be required by Section
14 499.012. Because there's not sales happening
15 there. I mean there -- there's offers to sale
16 -- sell that happen in these call centers, but
17 they're not actually selling or shipping drugs
18 out of that location.

19 Prior to 2016, Florida's statutory
20 definition of distribution included the phrase
21 "offer to sell." That is no longer in the
22 statute. That removal, together with the
23 language exempting from the definition of
24 wholesale distribution a location providing
25 solely administrative services, I would submit,

1 strongly suggests that a broad licensure
2 exemption for marking locations and call centers
3 would be appropriate.

4 The definition of distribute or
5 distribution still does include the word sell,
6 however. I recognize that. But Black's Law
7 Dictionary defines sell as, to dispose of by
8 sale, to transfer title or possession of
9 property to another in exchange for valuable
10 consideration.

11 And I would say that transfer of title or
12 possession is not happening at a location that's
13 just a typical call center or sales center where
14 just people with a bank of phones are located.
15 Or even someone, you know, sitting at this house
16 making sales.

17 I do think that there's a difference
18 between selling and offering to sell. And I
19 think that if you're just offering to sell, it
20 doesn't necessarily merit the same kind of
21 licensure and regulation as a normal drug
22 manufacturer or wholesaler.

23 I would say exempting sale centers from
24 licensure, as long as they don't transfer title
25 or physical possession from that location, would

1 seem to be consistent with DBPR's goal to
2 license efficiently and regulate fairly.

3 And so we have come up with just some draft
4 language for discussion purposes. I'm hoping
5 other members of the industry will provide their
6 own input as to what "solely administrative
7 services" mean, but we have come up with what we
8 think should be exempted from licensure.

9 And perhaps there's other definitions that
10 could be added to the regulation to clarify what
11 a call center is and things like that, but I
12 would welcome input from others.

13 And thank you very much for this
14 opportunity.

15 MR. WINTERS: Thank you, Ms. Hartsfield.

16 MS. ALSOBROOK: May I ask her a question
17 directly?

18 MR. WINTERS: Sure.

19 MS. ALSOBROOK: I'm not in the industry, so
20 what happens in a call center? Can -- I mean I
21 know they're not all the same across the board,
22 but could you give me a general idea.

23 MS. HARTSFIELD: In my antidotal
24 experience, a lot of times it's just people in a
25 room like this one with telephones where they

1 know what the inventory is at a different
2 location, one that is licensed to sell and ship
3 into Florida, and they call customers saying,
4 hey, we've got this. Or customers call them and
5 say, hey, I need this.

6 And it's just a call center where they're
7 taking orders. Sometimes these locations also
8 provide back office administrative support for
9 licensed locations. I don't know what all that
10 would be, but just HR type functions. Just back
11 office administrative, accounting type functions
12 and things like that.

13 So that's my understanding.

14 MS. ALSOBROOK: Thank you.

15 MR. WINTERS: Thank you, Ms. Hartsfield.

16 Our next speaker card is actually
17 Mr. Ty Jackson with GrayRobinson.

18 Mr. Jackson.

19 MR. JACKSON: Good afternoon. I'm
20 Ty Jackson with GrayRobinson. I'm also here on
21 behalf of a number of licensed Florida
22 manufacturers, Florida wholesale distributors
23 and wholesale brokers.

24 I had not intended to speak today, but I
25 did not want the lack of speakers to suggest a

1 lack of interest in this subject or a lack of
2 appreciation for the Department putting this
3 together and giving the industry an opportunity
4 to comment on the rules and help develop these.
5 So, thank you for that.

6 I have taken a look at the submission by
7 Ms. Hartsfield. I think it's certainly a good
8 start. We intend to discuss that with all of
9 our clients and provide comments by the 21st
10 deadline that you've given.

11 Ms. Alsobrook, to your question, we have,
12 for example, a client who has -- is a wholesale
13 distributor, has a location in South Florida
14 that's essentially an office location, and has
15 gotten -- it's licensed.

16 That entity also has locations in other
17 states in the country. Placed an order for a
18 product to be shipped from a New York
19 distributor to a location in Tennessee. Was
20 deemed because the distributor in New York did
21 not have a Florida license, and was deemed to be
22 selling into the state of Florida because the
23 phone call was made from the state of Florida.
24 That entity was licensed to ship to Tennessee.

25 And so we think this definition to

1 recognize those administrative type services
2 where the product never came into the state,
3 never touched the state, do not require, for
4 example, that entity in New York to have a
5 license from Florida to ship into Florida.

6 So we think that it can be very helpful to
7 the industry and really open up some of the
8 restrictions that make it difficult for entities
9 to be located in Florida and do their business.

10 And we have a lot of clients who want to be
11 here and enjoy being in Florida doing business.

12 So, thank you, again. I certainly would
13 take any questions, but just utmostly I don't
14 want you to think there's a lack of interest in
15 this topic or a lack of appreciation for the
16 time that you've put into it.

17 MR. WINTERS: Thank you, Mr. Jackson. I do
18 appreciate the time and I think that we all
19 recognize that there is an interest in the
20 industry and, like I said, we -- I appreciate
21 the comment.

22 You mentioned the South Florida entity.
23 Just a quick question. Is that one that is more
24 of a call center style or is that -- just to
25 understand a little bit more about -- is it more

1 of a sales center or is it -- is it more the --
2 an executive office?

3 MR. JACKSON: It's more of an executive
4 office. It's not a call center. That
5 particular client has a -- has multiple
6 locations in the state of Florida. The owner of
7 that company operates out of what is essentially
8 an executive office in South Florida.

9 That location is licensed in Florida, but
10 the problem in that instance is that the entity
11 in New York that the product was purchased from
12 was not licensed to ship or sell into Florida.

13 And so that's where the -- where the
14 problem arose. But it's -- I mean it's a
15 licensed location, but it's mostly just the
16 owner that operates out of that office. It's
17 not a call center type situation. Thank you
18 very much.

19 MR. WINTERS: Thank you, Mr. Jackson, for
20 those comments.

21 Is there any other speaker cards, Dinah?

22 Do we have any other individuals in the
23 audience that would like to make a comment or
24 otherwise provide an item for us to consider as
25 we move forward, obviously, in development of

1 any potential language?

2 I want to thank the two speakers currently
3 that are available.

4 Yes. If you could please state your name
5 for the record.

6 MR. HART: Good afternoon, my name's Peter
7 Hart. I'm with Airgas.

8 I think I'd like to add a bit of -- first
9 I'd like to start -- support for the words that
10 have been said so far. I agree that we need to
11 put good thought -- which we anticipate that you
12 will on this topic. And we, as the folks in the
13 industry, look forward to participating in that
14 with you, as always.

15 The call center concept is one that, in our
16 industry, in the compressed gas industry, is --
17 has similar aspects with the concept of
18 centralized offices where folks only take
19 information and they direct it, then, to the
20 properly licensed facilities within the state.
21 Not only this state, but across the country.

22 So in that aspect, all of the requirements
23 that we would fulfill within the state, and with
24 the federal requirements as well, are
25 accomplished at the -- at the licensed

1 facilities, whether that be managing customer
2 complaints, GMP compliance, proper handling,
3 storage, delivery, distribution, happens at that
4 level.

5 And we as a company train, inspect and
6 execute those aspects within the licensed
7 facility. And none of that is really directed,
8 including management of the delivery paperwork,
9 handles -- is handled at that local facility.

10 The call center is just a direction of a
11 centralized number as we try and make it easier
12 for people to get the products that they're
13 looking for.

14 The other aspect within this topic of
15 virtual behavior, I would be curious to make
16 sure that we don't encompass, for example, a
17 centralized logistics operation that is
18 intercompany.

19 For example, we manage the distribution
20 direction for supplying our customers, the
21 hospitals, the home healthcare companies, where
22 we deliver bulk product. We bring out talented
23 people together in a centralized place for
24 efficiency for us and they send down the
25 directions to the locations to say, please send

1 this truck with this product to this customer.

2 And after that level of direction, all
3 activity then is managed at the local level
4 within the licensed facility as far as
5 overseeing the quality of the product, the
6 proper testing and release, the GMP compliance,
7 the employee training of the people who handle
8 that product.

9 And I think, for me, that falls into,
10 again, that concept of a virtual facility. So
11 I'd like to see that maybe some thought into
12 considering those as well. Because we have had
13 discussions in other -- not necessarily in
14 Florida, but I have had that discussion come up
15 in other states to say that those should be
16 licensed as out-of-state operations.

17 MR. WINTERS: Give me -- I'm not sure I
18 completely understand the -- the facilities
19 which you're talking about is, there's a
20 centralized facility that, as a call center we
21 talked about --

22 MR. HART: Uh-huh.

23 MR. WINTERS: But you're talking about a
24 facility that's not necessarily a call center.
25 Is it just -- a little more information,

1 possibly --

2 MR. HART: Sure.

3 MR. WINTERS: -- on that.

4 MR. HART: Sure. It's an internal location
5 where, for rough numbers, the air separation
6 plants that produce the medical oxygen, medical
7 nitrogen, we have 50 plus of those around the
8 country. I've got four licensed bulk carbon
9 dioxide plants that produce USP product.

10 So because of those locations supporting
11 all across the country and because, as we have
12 had in -- along the Gulf Coast, from Texas,
13 Louisiana, into Florida, as we do -- through the
14 hurricane seasons we run into logistical issues.

15 And so companies like ours, we centralize
16 the dispatch of products to take advantage of
17 the mobilization of assets. For example, we
18 have a hurricane come through Orlando where we
19 have an air separation plant. We have power
20 outage for an extended amount of time.

21 That national scheduling location is going
22 to then look at bringing product in from the
23 most optimal second option. Say out of Atlanta
24 or out of South Carolina. Which is why, for
25 those locations that we may, you know, it's

1 emergency situations we proactively have
2 licensed to be able to deliver as an
3 out-of-state manufacturer.

4 But the people who sit in Cleveland, Ohio,
5 who are the people who talk to the customers and
6 monitor the electronic systems that tell us the
7 liquid oxygen levels at the hospital bulk
8 storage, they will -- they will give the
9 direction to the locations to say, we need to go
10 to a children's hospital in Orlando.

11 For an example, they're tank level is at 30
12 percent and we need to refill that tank. So
13 that location in Cleveland will send that
14 information to the Orlando manufacturing
15 facility and that local dispatcher then will
16 coordinate that delivery effort.

17 So the people that are at our central spot,
18 they're monitoring electronic systems, they're
19 talking with customers, getting tank readings,
20 etcetera. They're using computerized
21 forecasting models to determine when customers
22 need deliveries.

23 But as far as GMP operations, that's
24 happening at the local level. But we have had
25 that -- we have had that come up before. And so

1 even though it's probably not, for the majority,
2 it is -- to me it's something I'd like
3 considered as we look at the various topics that
4 fit within that virtual type concept.

5 MR. WINTERS: And one thing. We're
6 certainly taking all comments and I think it's
7 items that we have to consider and I think it's
8 helpful information to understand, you know,
9 obviously the different dynamics inside of the
10 different business models.

11 Just on that one, the centralized -- I'll
12 call it the national scheduling location --

13 MR. HART: Uh-huh.

14 MR. WINTERS: Just for -- are they the ones
15 that make the decision as to whether or not the
16 product should or should not go to a particular
17 location or does that go to the individual
18 licensed facility?

19 MR. HART: That goes downstream. Yes.

20 MR. WINTERS: So --

21 MR. HART: They're doing a forecasting
22 model.

23 MR. WINTERS: Okay.

24 MR. HART: And then the location is -- then
25 takes that and then does a further analysis.

1 MR. WINTERS: So they provide the data and
2 the non-centralized location makes the ultimate
3 decision?

4 MR. HART: Yes.

5 MR. WINTERS: -- as to whether or not --

6 MR. HART: Yes, because they're the people
7 who have to look at people, equipment and
8 understand the local deliveries as far as, you
9 know, many of our hospitals, especially in major
10 metropolitan areas, have what they call delivery
11 windows, where we look to say -- one of the
12 worse cases I can give you is New York City.

13 We have a multitude of hospitals within New
14 York City proper who give us one-and-a-half
15 hours per day that we can put a 40 foot tractor
16 trailer in to make a delivery because that is
17 the analyzed time that traffic, parking cars are
18 disbursed and we actually can physically make
19 that vehicle fit in that spot to reach that
20 tank.

21 So the same things happen here. You know,
22 we don't -- if you've ever been around when a
23 bulk oxygen trailer is making a delivery, it's
24 not a quiet operation. It can be quite noisy
25 and when you're in a hospital operation you

1 really don't want that going off at three in the
2 morning when you've got people trying to sleep
3 and recuperate and recover.

4 So a lot of places will limit that for the
5 -- for the time to accommodate the noise. So we
6 look at all those kinds of considerations and
7 that's where we rely on local knowledge, local
8 interaction.

9 And the other thing that happens as well is
10 we want that local point of contact to be for
11 the customers to know that if there is a
12 customer complaint, if there is -- if they have
13 a problem with a delivery, if they have a
14 question on billing, if they have a question on
15 product quality, that they're calling locally.

16 We don't direct them to the national levels
17 because it's -- we always -- at least for our
18 company we want -- we want the -- those types of
19 issues dealt with at the local level where the
20 knowledge is, where we have the GMP training,
21 the technical knowledge on the manufacturing
22 process, the testing, the release, so that it
23 doesn't go to a call center and a person has to
24 direct and defer.

25 You know, to me that creates just another

1 step that that customer is being delayed from us
2 getting to the solution. So that's -- so for
3 me, we really try and isolate the GMP practices
4 and behaviors to the licensed facility and not
5 defer those kinds of activities off to the
6 national scheduling.

7 If that makes sense.

8 MR. WINTERS: Yes, it's very helpful.

9 MR. HART: Good.

10 MS. ALSOBROOK: Director, if I might?

11 MR. WINTERS: Yes.

12 MS. ALSOBROOK: What I'm understanding is
13 that it -- you use these larger distribution
14 centers, like in Cleveland, to help you with the
15 inventory management, primarily, especially
16 during crises --

17 MR. HART: Uh-huh.

18 MS. ALSOBROOK: -- emergencies and things
19 like that.

20 I'm wondering if the wholesale prescription
21 -- if the nonmedical gas is used similar
22 situations. And maybe we'll have a speaker that
23 addresses that, too.

24 Because it would seem like that would be a
25 part of the industry that we would want to think

1 about. If people start calling like EMS
2 facilities or Department of Health facilities or
3 people planning for shelters start calling --
4 because we had that this last hurricane season
5 where there were a lot of calls where they
6 couldn't get enough medical gas into the
7 shelters and the director had to step in and
8 start handing out names for folks to get, you
9 know, because retail -- retailers of medical gas
10 don't have a hundred tanks worth of medical gas
11 sitting around ready to --

12 MR. HART: Right.

13 MS. ALSOBROOK: -- hand out on a -- on a
14 regular basis.

15 If that would be something that this type
16 of facility you're talking about would -- in
17 Cleveland -- is that -- is that what you would
18 utilize that for?

19 MR. HART: No. No. The call may go there,
20 but, in honesty, in those -- in those kind of
21 extremes and, honestly, that's where I get
22 involved. At the director level, that's where I
23 get involved.

24 Because we get involved with the FDA. We
25 got calls from the FDA with the hurricane in

1 Puerto Rico. And when we get to that level of
2 crisis, that's -- to me that's where it
3 escalates up to the executive level and we step
4 in and make those kind of tactical decisions.

5 But, again, that -- at that point, my
6 communication would not go through that
7 scheduling system. We would deal directly.

8 MR. WINTERS: So that would be handled
9 through the licensed facility?

10 MR. HART: Yeah. Absolutely. Absolutely.
11 Because we want to -- we want to get it always
12 -- for us, our view is, we always want to get it
13 to the -- get it down to where the rubber meets
14 the road, so to speak.

15 You know, we want -- we want to strive to
16 eliminate as many steps of communication in that
17 level that we get more direct pipeline.

18 MR. WINTERS: Okay. Thank you. Thank you
19 very much for explaining it -- the system to
20 understand.

21 MR. HART: Sure.

22 MR. WINTERS: All right. Thank you,
23 Mr. Hart.

24 Is there any other speakers or comments
25 that would like to be made on the record?

1 Going once, going twice. (No response.)

2 All right. Well, at this time, what I am
3 going to do is move -- and we're going to go
4 ahead and adjourn today's meeting, which will,
5 again, simply mean that the meeting itself will
6 be adjourned. It does not mean we've officially
7 closed the record.

8 As stated at the beginning of the workshop,
9 the Division will leave the official record open
10 or a period of 10 days to allow additional
11 written comments to be received by the Division.

12 You can, again, as stated, provide written
13 comments to Dinah Greene via mail at 2601
14 Blairstone Road in Tallahassee, 3231 -- excuse
15 me, 32399. Or via e-mail at [dinah.greene@](mailto:dinah.greene@myfloridalicense.com)
16 [myfloridalicense.com](mailto:dinah.greene@myfloridalicense.com).

17 You can find that contact information as
18 outlined in our notice in the Florida
19 Administrative Register.

20 With that and no other comments, I'll go
21 ahead and adjourn the meeting and we are closed
22 for today. Thank you.

23 (The Rules Workshop was adjourned at 1:31
24 p.m.)

25

C E R T I F I C A T E

STATE OF FLORIDA)

COUNTY OF ORANGE)

I, HEATHER K. HOWARD, Court Reporter,
certify that I was authorized to and did report the
aforementioned May 2018 Department of Business and
Professional Regulation/Division of Drugs, Devices
and Cosmetics Rules Workshop, 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