

MINUTES

UTAH

**ONLINE PRESCRIBING, DISPENSING
AND FACILITATION LICENSING
BOARD MEETING**

March 29, 2011

**Room 474 – 4th Floor – 9:00 A.M.
Heber Wells Building
Salt Lake City, UT 84111**

CONVENED: 9:01 A.M.

ADJOURNED: 12:54 P.M.

Bureau Manager:
Board Secretary:

Noël Taxin
Karen McCall

Board Members Present:

Mark N. Bair, MD, Chairperson
Roger Fitzpatrick, R.Ph.
Lt. Michael Ross
Jennifer R. Korb
Peter Ax

Board Members Absent:

John W. Bachman, MD
Kathleen Littlefield, R.Ph.

Guests:

Kevin Marino, Attorney
Lisa Dimick
Paul Rogers
Michael Rapp
Shaun Spriggs
David Nilson

DOPL Staff Present:

Mark B. Steinagel, Division Director
Francine Giani, Department Director
Karl Perry, Assistant AG
Julie Bolinder, Licensing Specialist
Ray Walker, Regulation and Compliance Specialist

TOPICS FOR DISCUSSION

DECISIONS AND RECOMMENDATIONS

ADMINISTRATIVE BUSINESS:

MINUTES:

The minutes from the February 22, 2011 Board

meeting were read.

Mr. Fitzpatrick made a motion to approve the minutes with minor revisions. Mr. Ax seconded the motion.

The Board vote was unanimous.

APPOINTMENTS:

Ms. Taxin explained that an application came in from Secure Medical, Inc. She stated she and her staff have reviewed the information to be sure it is as complete as possible before bringing the applications to the Board. She stated the applications consist of an Online Prescriber, a Pharmacy and a Facilitator. Ms. Taxin stated Secure Medical, Inc. will have one online prescriber who meets requirements of being licensed in good standing and having completed the contracts as required. She stated they will have one Pharmacy, Mountain West Apothecary which met Pharmacy requirements of being licensed in Utah in good standing and they have completed the contracts/documentation as required. Ms. Taxin stated the Facilitator application is also complete.

Ms. Taxin stated she also reviewed the online assessment, diagnosis and prescribing tool, the policies and procedures to be sure they include patient confidentiality, description of procedures on the mechanism of communication listed, including electronic and telephonic means, the description of procedures regarding how the prescriber and patient relationship will be established and maintained, documentation of meeting the public's privacy requirements to be sure it complies with 58-83-305. She stated she also reviewed the contractual services agreement and the procedures on how the Division will be allowed to conduct audits and the mechanism for filing complaints with a separate link to the Division. Ms. Taxin requested the Board review the branching questionnaire as required in 58-83-302 and the audit information which will be presented as required in R156-83-308.

Ms. Taxin stated when Secure Medical, Inc. gives their presentation, remember they are not yet live on the internet but their IT person will be on the

telephone showing their mock presentation and will assist in reviewing the branching questionnaire.

Mr. Steinagel commented Ms. Taxin, her staff and the Board are new at this process for online prescribing as this is only the second application to be reviewed. He stated, like KwikMed's review, the Board will be looking at Secure Medical, Inc. for specific items.

Mr. Ax asked about discussing issues that have been raised to the Division regarding Secure Medical, Inc.

Mr. Steinagel read the Statute which requires one Pharmacy in Utah. He then informed the Board that last week Mr. Marino submitted a letter regarding an online issue but the Division and Board are not at a point to have a discussion regarding the issue.

Mr. Ax asked if the Board should hear the issue so they are up to speed.

Mr. Steinagel responded the Board chairperson may open the floor for some discussion at the end of the meeting if he believes it is appropriate.

Dr. Bair commented the issue in question is apparently that Secure Medical, Inc. has more than one Pharmacy in the U.S. as a fulfillment center. He stated the issue should be tabled for discussion at a later date when the Division has made a decision.

Mr. Ax agreed to defer discussion at this time.

Mr. Steinagel read 58-83-201(4): Each applicant for licensure as an Internet facilitator under this chapter shall:

(h) sign an affidavit attesting that:

(ii) the applicant will and its principals, and any entities affiliated with them, will only use the services of a single online contract pharmacy named on the license approved by the Division;

Mr. Steinagel stated Secure Medical, Inc. has signed the affidavit to use the Utah Pharmacy only

9:30 am

Joel Korsunsky, Secure Medical, Inc., Review
of Secure Medical, Inc. Applications

1. Review & Discuss Branching
Questionnaire Presentation to
Determine if it Meets Requirements as
per 58-83-302(1)(f) and 58-83-305
2. Review & Discuss how the Division
will receive the Audit as per 58-83-308
and R156-83-308

for their Utah online orders.

Ms. Taxin requested the Board review the information presented to be sure the branching questionnaire is safe, confidential and has adequate communication between the patient, Physician and Pharmacy.

Joel Korsunsky, Secure Medical, Inc., met with Dr. Michael Rapp, Shaun Spriggs, Pharmacist and David Nilson, Pharmacist, for the review of Secure Medical, Inc. applications.

Board members and Division staff were introduced.

Mr. Korsunsky stated Secure Medical, Inc. has been in the process for online services approval for over four years. He stated he has communicated with Mr. Steinagel who was kind enough to send him a letter stating the complaint from KwikMed would not be addressed today.

Mr. Korsunsky contacted Rei Carvalho, Secure Medical, Inc.'s IT person, by telephone to walk the Board through the online information.

Mr. Carvalho reminded the Board that the site is for them to read only and only he would be able to make any changes. He stated the sections for the orders and the audits were recently revised.

Mr. Carvalho demonstrated how the audit will be available by the quarter or, if more information is needed, the year to date can be accessed. He stated the Division will be able to see the orders placed based on the information provided.

The Board requested more detail regarding the audit dates: i.e. 1st Quarter January 15, 2nd Quarter April 15, 3rd Quarter July 15, 4th Quarter October 15. The Board also requested the notes from the Physician be available in the audit information.

Mr. Carvalho explained the orders that are still in process will be seen with live information and histories if the Division checks the customer details.

He then demonstrated. He stated the Division will be allowed to log in as many times as necessary.

Mr. Carvalho moved on to the Assessment Tool/Branching Questionnaire. He demonstrated how the patient starts at the home page, uses the shopping cart, where they enter their credit card information and then the patient begins the questionnaire. He stated the patient must enter the correct information and it is mandatory for each question to be answered in order to move on. Mr. Carvalho stated there are personal questions to determine the health of the patient, then drug related questions and there are flags on the system which will pop up if the program detects a health issue. He stated if the patient is new, there is one list of questions and if they have ordered before, there is a different set of questions followed by the legal agreement.

Ms. Taxin asked if a patient clicks they are taking nitrates will the system take that patient to another set of questions regarding why they are on nitrates.

Mr. Carvalho responded no. He stated a red flag will prompt the Physician to review the answers to follow up with the patient. He stated the system will accept all the information but the Physician reviews everything prior to approval. He stated the Physician would email or call the patient and possibly reject the order.

Dr. Rapp stated if he sees the red flag he would make contact with the patient. He stated he also reviews for patients that might be using the online ordering for recreation drugs. He stated if he still had questions he would ask for the primary Physicians name and make contact for additional information. He stated if there are medical conditions checked he would definitely contact the primary Physician regarding the medical condition to determine if it is safe to prescribe to the patient. He stated if medical issues are checked there is a large red bar across the page that shows up on his queue for prescriptions and it requests the Physician to obtain additional information.

Mr. Ax asked what happens after the patient completes the questions. He asked if there are additional questions based on the original diagnostic question answers.

Mr. Korsunsky responded there is a pop up for additional information.

Mr. Carvalho stated depending on the medical conditions the Physician would make a decision to prescribe or not to prescribe.

Mr. Fitzpatrick asked if Mr. Carvalho could demonstrate what the Physician sees.

Mr. Carvalho responded he could not simulate what the Physician sees at this time since it is an example.

Mr. Ax asked if Mr. Carvalho could log into a live site for the demonstration.

Mr. Korsunsky responded he does not believe it would be appropriate as the other sites do not meet Utah's regulations.

Dr. Bair commented the company is not required to develop a branching questionnaire but is required to have an online assessment, diagnosis, and prescribing tool, such as a branching questionnaire. He stated he believes Secure Medical, Inc. is using the online assessment, diagnosis and prescribing tool where KwickMed used a detailed branching questionnaire.

Dr. Rapp again stated when he receives the information to prescribe if the patient has clicked on a medical issue he receives a large red line/flag to alert him to request additional information. He stated the concern is for important information to be red flagged, he personally contacts the patient and then determines if the prescription is appropriate for the patient.

Mr. Steinagel again read the Law (58-83-302(f)(i) and (ii)) regarding the company is to "submit the online assessment, diagnosis, and prescribing tool,

such as a branching questionnaire” and demonstrate to the Board’s satisfaction they have “not compromised the public’s health, safety, or welfare”.

Mr. Ax commented he believes there should be more questions and a branching questionnaire. He stated he also believes Secure Medical, Inc. should fully demonstrate all information on their Utah site. Mr. Ax asked if the Board were to approve the application for licensure would Mr. Korsunsky be willing to put all his sites under Utah Law requirements.

Mr. Korsunsky responded he would not answer the question as he believed Mr. Ax was asking as a competitor and not as a Board member.

Dr. Bair requested the issue be tabled until a decision has been made by the AG’s office and the Division.

Mr. Walker stated the standard is not if the applicant meets the highest possible requirements but for applicants to meet minimum requirements as listed in Statute for licensure. He asked if the assessment tool adequately protects the public.

Mr. Fitzpatrick asked what happens to a request if a patient submits the request which indicates some potential issues.

Dr. Rapp responded the request goes to his queue to review and he verifies health issues and contacts the primary Physician through an e-mail or a telephone call.

Mr. Fitzpatrick asked what type of information Dr. Rapp would require from the primary Physician. He also asked what type of protection is in place if the patient requests another prescription.

Dr. Rapp responded he would request a hard copy, e-mail or faxed copies of patient files to verify the information to determine the safety to prescribe. He

stated he will have the information regarding what was previously requested and prescribed or denied and if the patient lies on the questionnaire then he will have the original for comparison.

Mr. Walker asked if Dr. Rapp would ever need more interaction with the primary Physician than an e-mail communication.

Dr. Rapp responded if a person orders Propecia and he discovers the wife is pregnant, contemplating getting pregnant or could be pregnant he will contact the person to be sure they understand that the wife cannot touch the medication as it could cause birth defects.

Mr. Ax asked if the information is typed into comments.

Dr. Rapp responded yes. He stated he also puts the information in his own notes.

Mr. Ax asked if Dr. Rapp is responsible for this website.

Dr. Rapp responded there is only one website for Utah.

Mr. Ax asked if Dr. Rapp works on the other Secure Medical, Inc. sites.

Dr. Bair clarified the question as does Dr. Rapp have experience by using other websites.

Dr. Rapp responded yes, he does have experience by using other websites.

Ms. Korb asked if the information is reviewed and when is the credit card charged.

Dr. Rapp responded the information is reviewed prior to charging the credit card. He explained the credit card charge is at the end of the transaction when the medication is approved. Dr. Rapp stated there is a comment for the patient informing them their order has been placed and if there is an issue that has been

detected it will also say the Physician has a question and to please call a specified number or e-mail.

Dr. Bair asked if the Physician could be bypassed or does the Physician always receive the information to review and is there a statement notifying the Patient that the information will be reviewed by a Physician first.

Dr. Rapp responded no, the Physician cannot be bypassed. He stated he is either at the facility, is hard wired into the site or has the ability to access the site from another site but a prescription cannot be pushed through without his review and approval. He stated he reviews all requests. He stated he is not sure if there is a statement to the patient that their information will be reviewed by a Physician first before their credit card is charged and the prescription approved, but if he approves the order an e-mail is sent to the patient. He stated if the order is rejected an e-mail is also sent to the patient informing them to contact him by e-mail or voice mail.

Mr. Carvalho moved on to the order screen.

Mr. Steinagel stated there should be a screen notifying the patient their order is conditional upon the Physicians review and approval.

Mr. Korsunsky agreed.

Dr. Bair also requested a statement regarding the patient understands there will be no charge until the medication is approved.

Mr. Korsunsky agreed.

Dr. Rapp suggested they include a screen for the patient to verify their understanding that the information and order must be reviewed and approved by a Physician.

Ms. Taxin suggested the information be listed first in the process on the website questionnaire, such as "I understand before I precede my information and

order must be reviewed and approved by a Physician”.

Dr. Bair asked if the policies and procedures have any hard or soft stops that will not allow the process to move forward if specific information has been checked and if the order is rejected at that time or if the process is completed and then reviewed by the Physician.

Dr. Rapp responded the process is completed and then reviewed by the Physician. He stated he discovered a young man had marked no on all questions and he had to contact the young man to explain the information so he understood for future orders. He stated if the information does not pass Ideology or if the credit card is rejected then the order is rejected.

Dr. Bair asked if specific medical issues are checked does the patient have to address those issues specifically. He also asked if Dr. Rapp would approve the requested medications without checking with the primary Physician if the patient clicked on Angina.

Dr. Rapp stated when the patient clicks on the medical issues; a popup comes up informing them to supply additional information. He stated if angina was checked he would require contact with the primary Physician.

Mr. Ax asked if the Board should review another Secure Medical, Inc. site to determine if the Utah site meets a high enough standard.

Mr. Steinagel responded the Board should determine if the APEX RX site has a satisfactory assessment tool.

Mr. Walker stated if the Board does not believe this site meets the standard then they would need to more clearly define the specifics for a standard because the Law gives the current standard.

Mr. Ax responded the online prescribing is a

complicated industry and historically there have been 15 to 20 two dimensional questions before a medication request is evaluated and filled.

Mr. Korsunsky responded he does not believe the public safety is jeopardized by their questionnaire model but he also does not believe it will ever be perfect. He stated the information is reviewed based on the request from public patients and if everything is not addressed in the questions the Physician makes contact with the patient.

Mr. Fitzpatrick asked how a patient would submit a complaint or a compliment with positive feedback.

Mr. Carvalho responded the patient could either call the support number or do a live chat.

Mr. Steinagel commented the Board has discussed in the past having a link for complaints to come directly to DOPL.

Mr. Korsunsky responded there is an APEX privacy policy and the statement includes information for comments and complaints.

Through discussion, Mr. Fitzpatrick requested contact information to be included at the top of the home page to make it convenient for patients to file the feedback information.

Mr. Fitzpatrick asked what the Pharmacist sees when they fill a prescription. He asked if there is an area for the Pharmacist to address potential problems the Physician may not have picked up.

Mr. Spriggs responded the Pharmacist will not see the whole questionnaire but will have the medical history, the patient name, address, history of medications to determine if they are ordering in the correct timeframe, if they have allergies, etc. He stated any information that was flagged as a concern will also be available and the prescription will have the Physicians signature. Mr. Spriggs stated the Pharmacist creates a

Pharmacy HIPPA form and a label. He stated the only hard copy is the copy of the prescription, all other information is electronic.

Mr. Fitzpatrick asked what the process is when a concern is noted. He also asked how a patient would make contact with a complaint or a concern regarding the Pharmacy and if there are 800 numbers in place.

Mr. Spriggs responded the Pharmacist will reject the prescription and detail the concern to the patient, the facilitator or the Physician. He stated the policy directive is to contact the facilitator or the Physician directly about the prescription and there is information included with the prescription for the patient to contact the Pharmacist if there are questions regarding the medications. Mr. Spriggs stated the website has information for patients to contact customer service if they have complaints or they may contact the Pharmacy and the Pharmacy will communicate with customer service. He stated the 800 numbers and providing customers written information are in place now and Secure Medical, Inc. is currently in negotiations with the supplier for the products.

Mr. Walker asked if the feature for the live chat is with the Physician and/or the Pharmacy.

Mr. Korsunsky responded the live chat is for the patient to the Physician, patient and Pharmacy or patient to Physician and Pharmacy.

Mr. Fitzpatrick requested an explanation regarding the two yes answers on the Pharmacy application qualifying questionnaire.

Mr. Perry responded there was a non-disciplinary fine sent to the Pharmacist. He stated the incidents have been addressed and resolved.

Dr. Bair asked if the Board was ready to address the branching questionnaire or assessment tool.

Mr. Ax requested additional discussion on the

medical assessment tool. He requested the Board think of the assessment tool as a continuum where the patient fills out x number of questions and gets sent the medications the next day versus a large, extensive branching questionnaire. He stated he believes the questionnaire needs to be expanded to be more robust. He asked the Board what is the standard they are willing to accept.

Mr. Walker responded he believes it is the standard of what would happen if the patient is seeing the Physician and if the Physician has more personal exchange with the patient then maybe the site does not require such an extensive questionnaire.

Mr. Ax stated he would be more comfortable with a more extensive assessment tool.

Ms. Taxin stated she believes the audit would identify the mode of interaction with the patient whether by email, telephone or the questionnaire.

Mr. Ax responded it would be best to develop criteria regarding the specific interaction.

Mr. Perry explained developing criteria for future applications might be helpful but Secure Medical, Inc. has an application before the Board now and the Board decision has to be made based on the Law at this time.

Dr. Bair again asked if the questionnaire presented meets requirements. He stated the Law and the Board have not required any Physician audits other than the outlined quarterly requirement after licensure.

Mr. Korsunsky stated what he is hearing is the Board might think the questionnaire is not being read intensely enough by the Physician to assure the safety of the patient and the Board is requesting the Physician converse with the patient if there are serious illnesses noted as the Physician knows what questions to ask and what should be considered better than the

questionnaire.

Mr. Fitzpatrick responded he has some concerns as the Board has not been able to review the entire process of the system regarding how Dr. Rapp interacts with the patient, the prescription and how he transmits information. He stated those items were reviewed for the previous application. Mr. Fitzpatrick asked if DOPL would notify the Board if specific information is not found in the audit. He stated he believes the Board needs to see all the information to be sure it meets the standards set forth in the Law.

Ms. Korb voiced agreement with Mr. Fitzpatrick. She stated the Board was informed specific information will be on the website when the company goes live but the Board has not reviewed it yet.

Lt. Ross also voiced agreement with Mr. Fitzpatrick and Ms. Korb that he would like to review the whole package.

Dr. Bair stated he would also like to review a demonstration from inception to shipment.

Dr. Rapp responded he will request Mr. Carvalho to put together the information for the Board to review.

Mr. Fitzpatrick clarified he is interested in reviewing what the Physician sees and what happens in the exchange with the Pharmacist.

Mr. Korsunsky asked Mr. Carvalho if the site the Physician will see with the red highlighted block of medical conditions and Physicians comments has any red flags.

Mr. Carvalho brought up the site for review.

Dr. Bair noted the following options are listed: approve the prescription, decline, abstain, request additional information. He then asked what is meant by abstain.

Dr. Rapp responded abstain might be the Physician is abstaining from commenting or approving as the Physician might know the patient and might not be comfortable approving medication so it is referred to another Physician.

Mr. Steinagel asked if the Pharmacist receives the Physicians comments.

Dr. Rapp responded the Pharmacist will not receive the Physicians comments but the patient may receive a call from customer service to contact the Pharmacist as soon as possible. He stated the Pharmacist queue will also list other products the patient has ordered or purchased from Secure Medical, Inc.

Dr. Bair clarified when the site goes live everything will be available for review.

Dr. Rapp responded yes.

Mr. Steinagel asked the Board to consider the following: approval of the application, approval with conditions, hold the application for a complete review of the process or deny the application.

Mr. Fitzpatrick requested the opportunity to review the complete process prior to acting on the application. He stated he wants to be sure the information the patient inputs will give the Physician and Pharmacist enough information to fill the prescription appropriately.

Mr. Ax commented KwikMed was also requested to make some changes. He also requested to see the process from inception to completion.

Dr. Bair asked for a motion.

Mr. Ax made a motion to hold on approving the application and not deny but to allow Secure Medical, Inc. to come back with a complete presentation where everything works from inception to completion.

The motion died for lack of a second.

Lt. Ross made a motion to approve the application with the requested changes and allow Ms. Taxin to review and approve for licensure.

Ms. Korb seconded the motion.

Mr. Fitzpatrick requested a friendly amendment for the changes to be made and have the Board review the entire process prior to approval.

Ms. Korb seconded the friendly amendment.

The Board vote was unanimous.

Mr. Korsunsky listed the requested changes as follows:

1. Post a warning to the consumer regarding the credit card will not be charged until the order has been accepted and approved by the Physician.
2. Post a statement stating the consumer may be requested to contact the Physician or Pharmacy.
3. Copy the information in the Privacy Policy to the home page regarding contact information for complaints.
4. Amend a soft stop where the Physician would have to respond to medical conditions and/or medications and make a note regarding the outcome and what action was taken prior to moving forward with the prescription.
5. Include information regarding using vitamin and herbal supplements with the products.
6. Conduct a live functional demonstration.
7. Include in the assessment an area for the patient to list all allergies
8. Provide complaint language which links to DOPL.

Mr. Fitzpatrick commented if it is possible for Ms. Taxin to conduct the demonstration for the Board to review he would be comfortable with Mr.

Korsunsky not being physically present.

Mr. Marino commented the Board needs to be sure they are meeting the requirements of the open public meeting requirements. He stated he believes it is important for the demonstration to be conducted in a meeting and not privately by DOPL.

Mr. Steinagel responded it is not uncommon for the Board to give DOPL authority to check or review specific information and only include on the agenda an update but he would not recommend Ms. Taxin provide the live demonstration.

Dr. Bair asked if the Board should meet prior to May 3 for a final review.

Following discussion it was determined the Board will meet April 12, 2011 from 9:00 am to about noon and hold the date of May 3, 2011 open for an additional meeting with the understanding if there is no business to conduct the May 3, 2011 meeting will be cancelled.

Clarification Question

Mr. Steinagel informed the Board that he received a letter from Mr. Marino regarding Secure Medical, Inc. He stated the letter raised some issues and questions.

Dr. Bair asked if the issue of Mr. Marino's letter needs to be reviewed by the Board or if Mr. Marino should take a few minutes to explain.

Mr. Steinagel responded Mr. Marino could take a few minutes but the Board would not need to make a decision on the letter. He stated the Division does involve the Board in the process when necessary.

Ms. Taxin responded if she and Mr. Steinagel determine the information should be reviewed and/or discussed it will be included on the agenda for May but if it is not on the agenda it will not be discussed.

Mr. Marino responded the Statute indicates a closed universal site with one facilitator, one

fulfillment Pharmacy and Physicians. He asked if Utah has the authority to regulate outside Utah as Secure Medical, Inc. has multiple sites which could be considered fulfillment sites. He suggested the Board not approve an entity that traffics in drugs not approved by the Board or someone who operates through other websites dealing in or trafficking drugs outside those approved by Utah.

Mr. Steinagel responded Utah does not dictate what a company does outside of Utah.

Mr. Ax commented on the different business models in the market place.

Mr. Steinagel stated what matters for DOPL is what the Statute says. He stated each company must come in and be licensed by meeting the standards found in the Statute. He then requested termination of the discussion.

Questions regarding the Audit

Mr. Fitzpatrick asked if the audit of Secure Medical, Inc. will give the Division the information needed.

Ms. Taxin responded until the complete online information is active she will not know for sure but believes it is set up for what is needed to be reviewed. She stated after the first audit there may be a few areas that need adjusting as was the case with KwikMed. Ms. Taxin stated it is a working document so she is not worried about requesting amendments.

Mr. Fitzpatrick made a motion to accept the audit process with the understanding DOPL may need to request revisions.

Mr. Ax seconded the motion.

The Board vote was unanimous.

DISCUSSION ITEMS:

Update on Rule Filing

Ms. Taxin informed the Board that she has filed the Rule and a Hearing has been scheduled for 10:00 am

on May 3, 2011. She explained the Rule is only for including the approval of Hydroquinone 4% and Tretinoin up to 0.1% as Dr. Mark Taylor requested they be considered during the February 22, 2011 Board meeting. Ms. Taxin explained Board members are always invited to attend Rule hearings but are not required to attend.

Mr. Fitzpatrick corrected the February 22, 2011 minutes and Ms. Taxin by stating the prescription language should be Tretinoin up to 0.1%. He stated the correction would probably not be a substantive change requiring the Rules to be refiled.

Mr. Ax asked if DOPL has researched enough data on the two drugs to be comfortable with them being approved. He reminded the Board that he was absent physically from the last meeting.

Ms. Taxin responded yes, she has researched enough to be comfortable including the two drugs. She stated if KwikMed decides to use the drugs they must have questions in the branching questionnaire regarding the drugs. She stated Physicians would also need to be sure it is their scope of knowledge and practice to prescribe the drugs as it is unprofessional conduct to practice outside their scope.

NEXT MEETING SCHEDULED FOR:

April 12, 2011

ADJOURN:

The time is 12:54 pm and the Board meeting is adjourned.

Note: These minutes are not intended to be a verbatim transcript but are intended to record the significant features of the business conducted in this meeting. Discussed items are not necessarily shown in the chronological order they occurred.

April 12, 2011
Date Approved

(ss) Mark N. Bair, MD
Chairperson, Utah Online Prescribing, Dispensing &
Facilitation Licensing Board

April 4, 2011
Date Approved

(ss) Noël Taxin
Bureau Manager, Division of Occupational &
Professional Licensing