

STATE BOARD OF OPTOMETRY

2420 Del Paso Road, Suite 255 P [916] 575-7170 F [916] 575-7292 web: www.optometry .ca.gov



MEETING MINUTES

June 17, 2008

Board of Optometry
Ziggurat Building
Department of General Services
707 Third Street
West Sacramento, CA 95605
Room 1-475

Members Present
Lee Goldstein, OD, MPA
Board President
Susy Yu, OD, MBA, FAAO
Board Vice-President
Monica Johnson, Public Member
Board Secretary
Alejandro Arredondo, OD
Martha Burnett-Collins, OD
Mary Galvan Rosas, Public Member
Kenneth Lawenda, OD
Fred Naranjo, MBA, Public Member

Member Absent Richard Simonds, OD

Staff Present

Margie McGavin, Interim Executive Officer Gary Randolph, Licensing Coordinator Jeff Robinson, CE Coordinator

Legal Counsel

Don Chang, Supervising Counsel Michael Santiago, Board Counsel

Guest List On file

FULL BOARD OPEN SESSION

Katrina Semmes, Public Member

1. Call to Order

Dr. Lee Goldstein, O.D., called the meeting to order at 9:01 a.m. Margie McGavin called roll, and a quorum was established.

2. Approval of Minutes

The Board was asked to approve the minutes of the March 3, 2008 Board Meeting.

Move to approve the minutes as amended. M – Lawenda; S – Arrendondo; MSP – Unanimous.

The Board was asked to approve the minutes of the April 25, 2008 Teleconference.

Move to approve the minutes as amended. M – Lawenda; S – Arredondo; MSP – Aye – Goldstein, Johnson, Burnett-Collins, Rosas, Narnajo, and Semmes. Abstention – Yu.

3. President's Report

The President of the Board, Lee Goldstein, O.D. reported on recent Board-related activities as follows.

- Executive Officer selection process.
- Dr. Goldstein thanked Wendy Christensen and Linda Lupo from the Office of Administrative Services for their assistance in the Executive Officer selection process.
- Constituent issues average one a week.

4. Legislative Update

Senate Bill (SB) 1406 (Correa)- Optometry, Scope of Practice

Summary

SB 1406 was introduced on February 21, 2008 and makes a series of technical nonsubstantive changes to law regulating optometry and contains legislative intent language stating that in order to facilitate access to eye care in keeping with appropriate regard for the health, safety, and welfare of patients in California, the parties who are interested in the scope of practice of optometrists shall continue negotiations during the current legislative session on any proposed changes to the law governing this practice. This Bill states legislative intent that any proposed amendments to the law governing the scope of practice of optometrists shall be heard by the appropriate policy committees in each house of the legislature.

Existing Law

The practice of optometry includes the prevention and diagnosis of disorders and dysfunctions of the visual system, and the treatment and management of certain disorders and dysfunctions of the visual system, as well as the provision of rehabilitative optometric services, and is the doing of any or all of the following:

- (1) The examination of the human eye or eyes, or its or their appendages, and the analysis of the human vision system, either subjectively or objectively.
- (2) The determination of the powers or range of human vision and the accommodative and refractive states of the human eye or eyes, including the scope of its or their functions and general condition.
- (3) The prescribing or directing the use of, or using, any optical device in connection with ocular exercises, visual training, vision training, or orthoptics.
- (4) The prescribing of contact and spectacle lenses for, or the fitting or adaptation of contact and spectacle lenses to, the human eye, including lenses which may be classified as drugs or devices by any law of the United States or of this state.
- (5) The use of topical pharmaceutical agents for the sole purpose of the examination of the human eye or eyes for any disease or pathological condition. The topical pharmaceutical agents shall include mydriatics, cycloplegics, anesthetics, and agents for the reversal of mydriasis.

SB 1406 is sponsored by the California Optometric Association and may potentially change the scope of practice of Optometry.

Dr. Goldstein advised everyone that in his capacity as a volunteer with the California Optometric Association (COA) he has been involved in private discussions concerning this Bill. So far, Dr. Goldstein has not seen anything that would conflict with the role of the State Board or his role as President of the State Board.

Sean South, Senior Health Community & Regulatory Advocate with COA presented the status of SB 1406. Ongoing discussions are occurring with the California Academy of Eye Physicians and Surgeons and the California Medical Association. This Bill will be heard, in Assembly, one way or the other. The goal of this legislation is to reflect the education of our members in keeping up with the latest technologies and therapies. Overall the goal of legislation is to improve access to health care, especially in rural areas and communities of color. The Bill should be in print fairly soon.

Assembly Bill (AB) 2848 (Hernandez)

Summary

On February 25, 2008, AB 2848 was introduced providing for a licensee to apply to the State Board of Optometry for a retired license. The Bill would also provide that the holder of a retired license is exempt from continuing education, is not required to submit payment of the renewal fee and is prohibited from engaging in the practice of optometry.

Purpose

Currently there is no means available for an optometrist to apply for and receive a retired license. When an optometrist retires he/she can choose to continue paying their fees and fulfill their continuing education requirements to keep their license current or they can decide not to jump through the hoops necessary to maintain a license. If they choose the latter option their license becomes delinquent and ultimately gets cancelled. This cancellation causes two main problems:

- 1) It causes a public perception problem for the retiring doctor; and
- 2) If the O.D. decides they want to return to practicing, their preceding delinquency and cancellation causes bureaucratic impediments to returning to active status. Allowing optometrists to apply for and receive a retired license, as proposed in AB 2848, would permit optometrists to maintain a license that they worked to obtain, and truly value, and would make a possible conversion from retirement to active status a smoother transition.

Analysis

Although the Bill provides for the issuance of a retired license, it does not address the conversion process by which a retired license may be restored to active status.

For the purpose of restoring a retired license to active status, a regulation would be needed to define the requirements. For example, the holder of an inactive license who wishes to restore their license to active status is required to meet the requirements of Business and Professions Code section 704. A regulation would provide that the holder of a retired license meets the same requirements as that of an inactive license.

The California State Board of Optometry supports this Bill sponsored by Assemblyman Edward Hernandez, OD. This Bill was sent to the Business and Professions Code Committee, for review, on May 29, 2008.

As amended, this Bill would add section 3151 to the Business and Professions Code to create a license category for "Retired" Doctors of Optometry. "Retired" license applicants would pay no application fee and would be exempt from current continuing education requirements. While in retired status, the doctor would be prohibited from engaging in the practice of optometry.

The Board of Optometry has recognized that the absence of a specific retired license status for optometrists results in confusion for the public and inaccurate data collection by the board. Honorably retired optometrists are often not differentiated from those optometrists whose licenses have lapsed or are in delinquency. Proper accounting would also be beneficial in cases of extreme emergency declared by the Department of Health Services when all trained health care providers may be needed. Further, the retired category for licensure exists among other health care providers including physicians and surgeons and respiratory therapists.

Proposed Text of AB 2848

SECTION 1. Section 3151 is added to the Business and Professions Code to read: 3151. A licensee is exempt from continuing education requirements and payment of the renewal fee if the licensee has applied to the board for a retired license. The holder of a retired license may not engage in the practice of optometry. SEC. 2. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

Move to approve this legislation. M – Yu; S – Galvan Rosas; MSP – Unanimous.

5. Discussion and Possible Action to Amend or Add California Code of Regulations (CCR) Sections.

<u>CCR Section 1568 (Therapeutic pharmaceutical agents usage-purpose and requirements)</u>

Review

At the May 17, 2007 public meeting, the Board instructed staff to begin the rulemaking process to amend California Code of Regulation Section 1568. The proposed amendment would add sub-section (i) providing for the exemption of the 65-hour preceptorship requirement for TPA certification in California for out-of-state licensed optometrists applying for licensure. This regulation would apply only to those optometrists who graduated prior to January 1, 1996.

Status Update

The proposed regulation has been approved by the Department of Consumer Affairs and has been filed with the State Office of Administrative Law (OAL) for final approval. Interim Executive Officer Margie McGavin has issued a request to OAL that the regulation become effective upon filing with the Secretary of State. This request would provide substantial relief to applicants who have been waiting for an extended period of time due to the regulation process.

The projected effective date of the proposed regulation is July 7, 2008.

Background

On January 1, 2007, Senate Bill 579 (Statutes 2006, Chapter 302) took effect which allows the State Board to license an out of state licensed optometrist provided they meet certain specified requirements. Included in the requirements is compliance with

certification requirements to use Therapeutic Pharmaceutical Agents (TPA) set forth in Business and Professions Code (BPC) Section 3041.3.

Applicants will have a very difficult time meeting all of the requirements for TPA certification. Specifically, BPC Section 3041.3(b) requires that an applicant who graduated from an accredited school of optometry prior to January 1, 1996 must, among other things, complete a preceptorship service of no less than 65 hours. The preceptor shall be board certified and licensed in good standing with the Medical Board of California.

Because the preceptorship service involves treatment by the participating optometrist, the optometrist must hold a license to practice optometry in the state where the preceptorship service occurs. This requirement would prevent an out of state licensed optometrist from completing the preceptorship service here in California because they would have to be licensed in California as well. The only way to complete the preceptorship service would be to train in another state with a board-certified ophthalmologist who is currently licensed in California. This presents a problem for the applicant.

However, B&P Section 3041.3(d)(1) allows out-of-state applicants to request that the Board waive requirements in Section 3041.3(b) (which includes the 65-hour preceptorship) based on fulfillment of TPA requirements in another state. The Board shall grant the request for a waiver if it determines that the completed requirement was equivalent to California requirements. BPC Section 3041.3(d)(3) authorizes the State Board of Optometry to decide all issues relating to the equivalency of an optometrist's education or training and for a *committee to recommend protocol* for the Board to use in this regard. Implementing this authority would require a regulation.

Amendments to CCR Sections 1506, 1508, and 1509

Subject to Section 11340 of the Government Code, Board staff has reviewed the amendments and have determined that minor modifications would be needed to provide a clearer understanding of the regulation as it applies to the practice of Optometry.

Move to approve and accept amendments to CCR Sections 1506, 1508, and 1509. M – Rosas; S – Collins; MSP – Unanimous.

Move to delegate Executive Officer the authority to adopt amendments of regulations following a 15 day comment. M – Johnson; S – Lawenda; MSP – Unanimous.

The Board believes a blanket notification will be necessary regarding what the new requirements will be as a result of the regulations.

6. Documentation of Licensing Requirements

Summary

On May 21, 2008, Board staff was contacted by an official from the U. C. Berkeley School of Optometry seeking the Board's thoughts on accepting a degree verification by way of a Certification of Completion for Graduate Degree from the School of Optometry in lieu of an official school transcript. This verification certificate would be used to verify an applicant's educational requirement for licensure.

Existing Law

Business and Professions Code Section 3045 states that, "Applications shall be verified by the oath of the applicant and shall contain information and evidence satisfactory to the board showing the eligibility of the applicant." Also, Section 3046 provides that, "In order to obtain a license to practice optometry in California, an applicant shall have graduated from an accredited school of optometry, passed the required examination for licensure, and not have met any of the grounds for denial established in Section 480. The proceedings under this section shall be in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code."

This item was for information and discussion only.

California Code of Regulations Section 1523(b)(2) states that an applicant must provide "Satisfactory evidence of graduation from and optometry school approved by the Board."

On January 1, 2005, AB2464 added Section 3025.1 to the Business and Professions Code which provides that the Board may adopt rules and regulations that are, in its judgment, reasonable and necessary to ensure that optometrists have the knowledge to adequately protect the public health and safety by establishing educational requirements for admission to the examination for licensure.

Current policy requires that an applicant shall submit an official transcript from their school of optometry as satisfactory evidence of meeting the requirement of Section 3046. The transcript must show that the applicant received a degree in Doctor of Optometry and the date the degree was issued.

Issue

At issue is whether the State Board of Optometry should amend its current policy on licensing requirements and adopt a new policy of accepting other forms of evidence as meeting the requirements of BPC Section Code 3046 and CCR Section 1523 (b)(2).

* Note *

This issue has been resolved. The university can provide the necessary documentation of completion; therefore, no action is required by the board.

7. Strategic Plan

Goal 1 - Licensing

Provide applicants and licensees a fast, accurate and cost effective process for obtaining and maintaining licensure registration and certifications required to practice optometry in the State of California.

Objectives	Status / Comments	Target Completion Date
Successfully implement automated cashiering and license tracking system (Applicant Tracking System (ATS))	ATS launched on 7/1/07. Licensing and cashiering functions are fully implemented.	Completed
Establish "retired" license via legislation	Assembly Bill 2848 (Hernandez) introduced February 21, 2008	
Develop procedures for continuing education audits and promulgate necessary regulations to implement.	Request for additional staff to perform audit submitted to DCA Aug 2007 Funding for additional staff is pending approval of Governor's Budget for 2008/09.	12/31/08
Explore alternatives to publishing address of record on the Board's website when licensee is not practicing optometry and make necessary changes in statute, regulation and/or procedure to implement best alternative.	Preliminary discussion with DCA IT staff in Aug 2007. DCA is working on similar issue for another board. Optometry might "piggyback" on the work done for the other program.	09/30/08
Implement online license renewals (iLicensing)		07/01/09

Goal 2 - Examinations

Provide a fair, valid and legally defensible licensing exam and exam process to ensure that only qualified and competent individuals are licensed to provide optometric services in the State of California.

Objectives	Status / Comments	Target Completion Date
Successfully implement computer based testing for California Laws and Regulations Examination	Computer based testing can be implemented at no cost to the Board. Board staff to met with Office of Exam Resources to establish implementation plan. There should be approx. 150 questions banked before computerized exam is implemented.	07/31/08
Perform ongoing exam development and validation workshops of California Laws and Regulations Examination	Workshops held in fiscal year 2006/07. Board adopted new exam on July 12, 2007. New exam administered for the first time in Aug. 2007. Candidate handbook published in January 2008. One time budget enhancement approved for Fiscal year 2008/09. Contract with OER for Fiscal year 2008/09 under development.	Ongoing
Perform occupational analysis of optometric practice in California and compare results with California Laws and Regulations Examination and with the National Board of Examiners in Optometry (NBEO)	Request for funding submitted to DCA Aug. 2007. Request was approved in November 2007. Contract with OER is being processed. Funds are pending Governor's Budget for Fiscal year 2008/09.	06/30/09

Goal 3 - Legal and Regulatory

Establish and maintain fair and just laws and regulations that provide for the protection of consumer health and safety and reflect current and emerging, efficient and cost-effective practices.

Objectives	Status / Comments	Target Completion Date
Participate in scope expansion discussions, as appropriate	Legislation was introduced in February 2008 and is currently in the negotiation process.	
Pursue legislation necessary to implement other strategic goals and objectives.	Necessity to be identified.	TBD
Pursue changes to California Code of Regulations to implement new laws affecting optometry	Section 1568 – Regulation to establish equivalency for out of state applicants requirements under DCA review. Projected effective date: July 2008. Section 1509 – Regulation to define temporary practice presented to board in March 2008 and revised in June 2008.	Ongoing
Successfully participate in Sunset Review process and extend the Board's sunset date.	Optometry Practice Act set to become inoperative on 7/1/10. However, sunset review process is under review in the legislature. SB 963 proposes to revamp the process.	07/01/10

Goal 4 - Enforcement

Protect the health and safety of consumers of optometric services through the active enforcement of the laws and regulations governing the safe practice of optometry in the State of California.

Objectives	Status / Comments	Target Completion Date
Develop and implement training program for subject matter experts	This project was previously placed on hold due to staff turnover and workload.	12/31/08
Develop and implement alternative means to investigate complaints in lieu of the Division of Investigations	Enforcement staff has been conducting informal investigations. DOI has agreed to obtain specific types of documents, i.e., financial or legal documents. DOI is not conducting formal investigations for the board at this time. DOI has agreed to escort board staff if/when a face-to-face interview of a probationer is necessary. Enforcement staff has met with staff from other boards to explore further investigative options. Will work with legal counsel on authority and procedure for issuing subpoenas.	03/31/08
Explore feasibility of gaining site inspection authority	Will require legislation and budget enhancement.	01/01/10
Implement case management approach to enforcement procedures	New enforcement staff is in training and new internal processes are being developed.	04/30/08
Explore options for improving inquiries into insurance fraud cases	Enforcement staff met with VSP (Vision Service Plan) and DHCS (Department of Health Services).	06/30/08
Explore options for fighting unlicensed practice of optometry	This is a DCA priority	02/29/08

Goal 5 - Education and Outreach

Proactively educate, inform and engage consumers, licensees, optometry students and other stakeholders about the practice of optometry and the laws and regulations governing the same.

Objectives	Status / Comments	Target Completion Date	
Publish common causes for discipline of optometrists	List of disciplinary actions taken 1995-present completed. Should be completed in time for board presentation to new graduates of optometry school.	01/31/08	
Develop and disseminate a "Starter Kit for New Ods"	Should be completed in time for board presentation to new graduates of optometry school.	01/31/08	
Develop and implement program for outreach to optometry students in California	Two board members and board staff presented an overview of the board's purpose to both SCCO and UC Berkeley 4 th year students in February and May 2008. SCCO, UCB and Board staff to explore increasing visits to up to once a year.	Completed and ongoing	
Develop and implement plan to outreach to licensed optometrists at continuing education events	Board staff attended COA Monterey Symposium in Nov. 2007.	02/28/08	
Attend consumer outreach and health fairs	Request for funds to attend outreach events submitted to DCA Aug 2007.	Ongoing	
Publish updated consumer Information, including, but not limited to:	Fact sheet on license certifications published in March 2008. Information on how to file a complaint and what to expect after filing published online.	Completed and ongoing	
 Different levels of certification and scope of optometric practice How to file a complaint & what to expect after filing a complaint 			

Goal 6 - Organizational Effectiveness

Develop and maintain an efficient and effective team of professional and public leaders and staff with sufficient resources to improve the Board's provision of programs and services.

Objectives	Status / Comments	Target Completion Date
Pursue additional funding for equipment and staff needed to meet strategic goals	Funding for new digital printer and fax machine in Fiscal year 2008/09 budget.	Ongoing
Identify staff training needs and establish corresponding training plan	Staff were promoted and duties were reassigned in January and February 2008. New staff was acquired in March 2008. Training on new duties is still underway. Training plans to be developed in next quarter.	12/31/07
Re-establish the Board's national presence as a regulator of optometry	Governor's office has authorized the board to send one representative out of state to attend ARBO annual conference in Seattle in June 2008.	Ongoing
Develop training program for new Board members	Suggest development of written material and establish buddy system. Explore possibility of DCA to develop a board member manual.	02/29/08

8. State Board Outreach Programs Discussion and Recommendations

Two Board members and two staff members made a site visit to the University of California Berkeley college of Optometry to address approximately 70 4th year students. The Board representatives gave a 45 minute power point presentation regarding the Board's role as a public entity charged with protecting the public through regulation of the practice of optometry.

9. Executive Officer's Report

Interim Executive Officer, Margie McGavin reported on the following:

Update Printed Licenses

Staff has requested that printed licenses more clearly reflect the different levels of certification (therapeutics, lacrimal irrigation, and/or glaucoma) in March 2007. A mock up of the revised licenses which were submitted in the last EO report are being finalized and should be ready for production soon.

Staff is also researching options for improving the original wall certificate that is issued upon licensure.

Exam Workshop

The exam workshops are being completed as scheduled with the last workshops to be conducted on June 22 and 23, 2008. We have had another successful round with many returning subject matter experts volunteering their time for this endeavor. For their efforts, each participant is receiving eight hours of continuing education credits. We have received numerous favorable responses from the participating optometrists indicating their appreciation for the opportunity to serve the Board in this capacity.

Staffing Changes

The Board's licensing staff consists of 2 full-time positions and one half-time position. The board promoted an existing employee into the licensing program effective April 1, 2008. The new licensing staff is currently being trained in processing Optometric Licenses and Statements of Licensure, as well as conducting the training of the cashiering function to the newly acquired receptionist hired in April 2008.

The personnel changes that have taken effect have caused some backlog in the cashiering and licensing function. We are striving to diminish this backlog as we continue in our training endeavors.

ENFORCEMENT PROGRAM

The Board's enforcement program is staffed with two full-time employees. The Board promoted an existing employee from the licensing program into the enforcement program effective January 1, 2008 and is continuing to train in this position and being exposed to all aspects of the enforcement program relating to the complaint and disciplinary process.

HIPDB

The Health Integrity and Protection Data Bank (HIPDB) is a national data bank of adverse actions taken against licensed health care professionals (see attached fact sheet for more information on the HIPDB). The Board is fully compliant with the mandate of reporting the adverse actions taken on licensed optometrists from 2001 to present. Board staff is beginning to utilize the reporting capabilities of this data bank for reports regarding our licensees from other reporting agencies.

Backlog

Due to the ongoing training, we continue to have a backlog of approximately 22 pending complaints. The Board's new enforcement representative is currently being trained on complaint intake processes.

Investigations

Enforcement staff has recently communicated to the Division of Investigation (DOI) the need for services to augment the in-house investigations being performed by the board staff. DOI was able to provide some document retrieval and undercover services for the board without opening an entire investigation, which has not been possible given the backlog at DOI. This method of investigation assistance has proven to be successful and the board staff hopes to utilize DOI for further assistance of this nature.

Board staff has met with a representative of a similar sized board and discussed possible participation of pooling expertise and resources on probation monitoring and investigations. Further discussion is required after reviewing the documentation regarding their program.

Board staff met with Vision Service Plan (VSP) investigation and management members and Department of Health Care Services (DHCS) staff in an open forum meeting to discuss and share information regarding fraud investigations and reporting policies. The information was insightful and improved the communication relationship between the Board, DHCS and VSP.

State Board of Optometry Budget

The attached budget projection indicates that the board is operating within its operating budget in the current fiscal year.

We have also signed the Interagency Agreement with the Office of Exam Resources for the exam development and Occupational Analysis. A finalized contract should be forthcoming soon.

Calendar of Events

June 22 - 23, 2008	California Law Workshop	Sacramento
June 22 – 24, 2008	ARBO Annual Convention	Seattle, Washington
August 22, 2008	California Law Exam	Memphis, TN
September 3, 2008	Board Meeting	Western University,
		Pomona
November 20, 2008	Board Meeting	Westin LAX, Los Angeles

Communication and Outreach

Web Updates

The Board continues to receive favorable review from other boards and consumer agencies in regards to the design, content and easy access to the information contained on our website. The following items have been updated and posted to the website within the last quarter:

- Link to FAQ's About DEA Numbers and Prescribed Controlled Substances
- Designed a new Fact Sheet which informs the public entitled, What Do The Letters After An Optometrist's Name Mean
- Modified the Continuing Education Certification document regarding the CPR certificate, which is no longer needed.
- Posted results of the April 2008 administration of the California Law Exam

Outreach

Two Board members and two staff members made a site visit to the University of California, Berkeley School of Optometry to address approximately 70 4th year students. The Board representatives gave a 45-minute power point presentation regarding the Board's role as a public entity charged with protecting the public though regulation of the practice of optometry.

Security Breach

On June 11, 2008 a notification was distributed by the Department of Consumer Affairs management via email and U.S. mail regarding an incident in which the names and Social Security numbers of Department employees and volunteers was inappropriately sent outside the Department.

The notification provided information for all employees and volunteers to take the necessary steps to secure their individual private information. These steps included:

- Placing a fraud alert on your credit files.
- Review your credit report for accuracy of personal information, accounts you did not open, inquires from creditors not initiated by you.
- Call your local police or sheriff's office if you find suspicious activity on your credit report.
- Check your credit report every three months for the next year.
- For more information, visit the website of the California Office of Privacy Protection at www.privacy.ca.gov

There is a current investigation into this incident and further information will be distributed as it becomes available.

11. Future Agenda Items

Board members were given the opportunity to raise new issues for consideration at future meetings. Issues brought forward were:

- Policy matter out-of-state doctors
- Disposition of expired Optometrist Licenses
- Extended Optometric Clinics
- Report from ARBO
- Accreditation

12. Future Meeting Dates

The Board is scheduled to meet in 2008 as follows:

- September 3, 2008 (Wed) Western University in Pomona.
- November 20, 2008 (Thurs) Westin LAX in Los Angeles

13. Public Comment

Members of the public may address the Board members at this time. The Board President may allow public participation during other agenda items at his/her discretion.

14. Closed Session

- Disciplinary Matters
- Executive Officer Interviews and Selection

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	meeting			

Monica Johnson, Secretary	Date	