Minnesota Board of Pharmacy

EIGHT HUNDRED AND SIXTIETH MEETING

At approximately 9:00 a.m., on February 1, 2017, the Minnesota Board of Pharmacy met in Conference Room A, at the University Park Plaza Building, 2829 University Avenue Southeast, Minneapolis, Minnesota, for conducting a general business meeting. Members of the Board that attended were Mr. Stuart Williams, Dr. Joseph Stanek, Dr. Kurt Henn, Dr. Andrew Behm, Mr. James Bialke, Ms. Samantha Jaworski, Ms. Laura Schwartzwald, Dr. Mary Phipps, and Mr. Rabih Nahas. Also in attendance were the Board’s Executive Director, Dr. Cody Wiberg; Deputy Director, Dr. Beth Ferguson; Legal Counsel, Mr. Hans Anderson; and Board of Pharmacy staff members, Ms. Candice Fleming, and Ms. Lamar Niemczycki.

President Stuart Williams called the meeting to order.

The Board went into closed session to consider disciplinary cases.

At the conclusion of the closed session, the meeting opened to the public.

The Board next discussed the minutes of the December 21, 2016 business meeting. The minutes were approved as distributed.

Mr. Bialke moved and Mr. Nahas seconded that the items on the Consent Agenda be approved. The motion passed unanimously.

The Consent Agenda for the meeting was as follows:

- Variance and Policy Review Committee Report (VPRC) – Approve
- CE Report - Approve

Ms. Schwartzwald requested that a discussion of a resolution that will be considered at the NABP annual meeting, and that involves antibiotic stewardship and immunization, be added to the agenda. Ms. Schwartzwald moved and Mr. Bialke seconded that the remainder of the agenda be approved. The Board unanimously approved the remainder of the agenda, as amended.

The first variance and policy review issue to come before the Board was from foreign pharmacy school graduate Usama Hmady. He requested to be allowed to sit for the NAPLEX and MPJE without being FPGEC Certified. He claimed that, as a refugee, he had not been allowed to participate in the FPGEC process. Dr. Wiberg explained the background for this variance request, including the fact that Mr. Hmady failed to reveal that he actually has been allowed to sit for the FPGEE twice and that he had failed the exam both times. Mr. Hmady was not present at the time this issue was discussed by the Board. Mr. Bialke moved and Mr. Henn seconded that the request be denied. The motion passed unanimously.

Ms. Schwartzwald recused herself and left the meeting room.

The next variance and policy review issue to come before the Board involved GuidePoint Pharmacy #102, in Rochester, Minnesota. The variance request was to allow the delivery of
prescriptions to the nursing staff of Assisted Living Facilities (ALF) and/or home health care offices. The Variance and Policy Review Committee recommended a two year approval and a timely renewal. The Board unanimously approved the VPRC recommendation.

Ms. Schwartzwald returned to the meeting.

Dr. Wiberg next provided an update for the Minnesota Prescription Monitoring Program. No action was required.

Dr. Wiberg next provided an update concerning the Board’s proposed work conditions rule and explained a proposed Order Adopting Rules. Mr. Nahas moved and Ms. Schwartzwald seconded that the Order be adopted. The motion was unanimously approved.

Dr. Wiberg gave an update on both budget and policy legislation. After providing information about the Board’s proposed budget, he explained legislation being pursued by the Pharmacy Advocacy Task Force that would allow pharmacists to prescribe oral contraceptives, travel medications, opiate antagonists and nicotine replacement drugs. After discussion, Dr. Behm moved and Mr. Bialke seconded that the Board go on record as supporting this legislation. The motion was unanimously approved.

Dr. Wiberg next explained legislation that would allow pharmacists to make substitutions of biosimilar drugs. After discussion, Dr. Phipps moved and Mr. Bialke seconded that the Board go on record as supporting this legislation. The motion passed unanimously.

Dr. Wiberg then explained language proposed by Baxter that would exclude manufacturers of certain dialysate solutions from being licensed as pharmacies in order to dispense drugs directly to patients. After discussion, Ms. Schwartzwald moved and Mr. Bialke seconded that the Board go on record as opposing this language. The motion passed unanimously.

Dr. Wiberg next explained the various provisions that are included in a proposed Board policy bill. After much discussion and some testimony from the public, Mr. Bialke moved and Dr. Behm seconded that the Board support the proposed policy bill and authorize Dr. Wiberg to pursue its passage. The motion passed unanimously.

Dr. Wiberg next gave an update on office management, specifically concerning the plan for organizational restructuring and salary range reassignments that was submitted for the approval of Minnesota Management and Budget. No action was required.

Dr. Wiberg next provided information about the upcoming NABP annual meeting. Dr. Stanek moved and Ms. Schwartzwald seconded that the Board authorize the expenditure of the funds necessary to pay for all Board Members, the Executive and Deputy Directors and one Surveyor to attend the meeting. The motion was unanimously approved.

Ms. Schwartzwald next provided information concerning a resolution that will be considered at the NABP annual meeting. Mr. Bialke moved and Ms. Schwartzwald seconded that the Board support the resolution. The motion passed unanimously.
There being no further business requiring action by the Board, President Williams adjourned the meeting at approximately 11:35 AM.

_______________________________
PRESIDENT

___________________________________
EXECUTIVE DIRECTOR

Double click on picture to review.
December 18, 2016

MINNESOTA BOARD OF PHARMACY

ACTION ITEM

Cindy C. Woodard

Minnesota Board of Pharmacy
2001 University Avenue SE, Ste 508
Minneapolis, MN 55414
Cindy.C.Woodard@mpls.mn

december 19, 2016

DEPARTMENT OF COMMERCE

Title: In the Matter of Proposed Permanent Rules Relating to Pharmacy

Work Conditions

6069-31070; Revision: 4

CODA

Dear Mr. Wang:

Enclosed herewith and served upon you is the ORDER ON REVIEW OF RULES
UNDER MINN. STAT. § 34.75 in the above-referenced matter. The Administrative Law
Judge has determined there are no negative findings in these rules.

The Office of Administrative Hearings has signed this file and is returning the rule
record so that the Minnesota Board of Pharmacy may publish this rule in the
Official State Register. The office is requesting that you return this document
record in this fashion. The Office of Administrative Hearings will receipt copies of the
adopted rules from the Governor’s office following receipt of that order. Our office will then
return four copies of the adopted rules to the Governor, one copy to the
Secretary of State, one copy to the Division of Rules, and one to the agency for its
manuscript record. The Board will then receive from the Governor’s office these copies of the Notice of Adoption of the
rules.

The Board’s next step is to arrange for publication of the Notice of Adoption in the
State Register. Two copies of the Notice of Adoption provided by the Governor’s
office should be submitted to the State Register for publication. A permanent rule with a
hearing does not become effective until five working days after a Notice of Adoption is
published in the State Register in accordance with Minn. Stat. § 14.27.

Sincerely yours,

Cindy C. Woodard

Cindy Woodard
Variance Committee Report of December 7, 2016
for Board Meeting of December 21, 2016
9:00 AM in Conference Room C

Attendees: Stuart Williams, Andrew Behm, Ame Carlson, Michele Mattila, Steve Huff, Sarah Favour, Alison Sinclair, Blair Miller, Kristi Melby, Stacey Jassey, Emily Peach, Beth Haller, and Teresa Kossakowski

Meeting Appointments:

10:00
Omnicare - Minnesota Brooklyn Center
Alison Sinclair 261366-021
policy review of an Omnicell automated distribution system for nursing homes as an e-kit
Not Approved
Resubmit policies and procedures to address pharmacy staff training, negative drug list, and access parameters (sign-on)

10:30
PharMerica Fridley
Blair Miller 261548-016
policy review of unique identifiers
Not Approved
Submit revised policies and procedures to address unique identifiers. Include the procedures for all steps of the dispensing process. Additionally, submit a variance request to MN Rule 6800.3100 for the break-up of certification

11:00
Genesis Recovery Services, LLC Duluth
Kristi Melby Pending
to allow an exemption from the Board's rule regarding space
Approved – Indefinitely
On condition that the practice does not change

Genesis Recovery Services, LLC Duluth
Kristi Melby Pending
to allow an exemption from the Board's rule regarding equipment
Approved – Indefinitely
On condition that the practice does not change
12:00
Genoa Pharmacies 15 Locations
Stacey Jassey
to allow the delivery of prescriptions to a behavioral health agency so that a nurse can deliver the medications directly to the patient
Approved – One Year
On condition that you follow the policies and procedures you submitted and that any policy changes are be highlighted within the policies and submitted for Board approval prior to implementation

1:00
Valhalla Place - Brooklyn Park Brooklyn Park
Maison Mohamed 265091-001
to allow an exemption from the Board's rule regarding having a pharmacist on duty at all times
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila

Valhalla Place - Brooklyn Park Brooklyn Park
Maison Mohamed 265091-005
to allow certification to be done per pharmacy policy
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila

Valhalla Place - Woodbury Woodbury
Kenneth Kramer 265090-001
to allow certification to be done per pharmacy policy
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila

Valhalla Place - Woodbury Woodbury
Kenneth Kramer 265090-002
to allow an exemption from the Board's rule regarding having a pharmacist on duty at all times
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila
Valhalla Place Brainerd, LLC  
Lisa Iverson  
Brainerd  
265202-004

to allow the certification and verification processes to be done per the pharmacy’s policies  
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila

Valhalla Place Brainerd, LLC  
Lisa Iverson  
Brainerd  
265202-005

to allow an exemption from the Board's rule regarding having a pharmacist on duty at all times  
Deferred
Resubmit policies and procedures with a cross reference to the Methadone Guidance Document and address other issues after working with Board surveyor, Michele Mattila

1:30
Dakota Treatment Center  
Teresa Kossakowski  
Burnsville  
261484-003

to allow an exemption from the Board's rule regarding space  
Approved – Indefinitely  
On condition that the practice does not change

Dakota Treatment Center  
Teresa Kossakowski  
Burnsville  
261484-011

to allow a pharmacist to perform remote order review or entry and buprenorphine certification of doses for new patients from the clinic in Rochester for the treatment centers in Burnsville, Roseville, and St. Cloud  
Deferred
Resubmit policies and procedures to address MN Rule 6800.3200 after working with Board surveyor, Michele Mattila

Dakota Treatment Center  
Teresa Kossakowski  
Burnsville  
261484-013

to allow the pharmacist to be pharmacist-in-charge at both Rochester Metro Treatment and Dakota Treatment Center  
Approved – 3 Months
Rochester Metro Treatment  Rochester
Teresa Kossakowski  262695-011
to allow a pharmacist to perform remote order review or entry and buprenorphine certification of doses for new patients from the clinic in Rochester for the treatment centers in Burnsville, Roseville, and St. Cloud
Deferred
Resubmit policies and procedures to address MN Rule 6800.3200 after working with Board surveyor, Michele Mattila

Rochester Metro Treatment  Rochester
Teresa Kossakowski  262695-013
to allow the pharmacist to be pharmacist-in-charge at both Rochester Metro Treatment and Dakota Treatment Center
Approved – 3 Months

St. Cloud Metro Treatment  St. Cloud
Denise Frank  262696-001
to allow an exemption from the Board's rule regarding space
Approved – Indefinitely
On condition that the practice does not change

St. Cloud Metro Treatment  St. Cloud
Denise Frank  262696-011
to allow a pharmacist to perform remote order review or entry and buprenorphine certification of doses for new patients from the clinic in Rochester for the treatment centers in Burnsville, Roseville, and St. Cloud
Deferred
Resubmit policies and procedures to address MN Rule 6800.3200 after working with Board surveyor, Michele Mattila

St. Paul Metro Treatment Center  Roseville
Karen Wick  261485-007
to allow an exemption from the Board's rule regarding having a wall surround the pharmacy from the floor to the permanent ceiling and keeping the medication in a DEA approved safe
Approved – Indefinitely
On condition that the practice does not change
to allow a pharmacist to perform remote order review or entry and buprenorphine
certification of doses for new patients from the clinic in Rochester for the treatment
centers in Burnsville, Roseville, and St. Cloud
Deferred
Resubmit policies and procedures to address MN Rule 6800.3200 after working with
Board surveyor, Michele Mattila

Policy Reviews:

Lakeview Memorial Hospital Pharmacy Stillwater
Cynthia Appleseth 200202-002
policy review of central services for the WI locations
Approved
You are required to comply with all applicable Minnesota, Wisconsin, and federal
regulations and that the policies are utilized only for the 3 Wisconsin sites listed. Any
policy changes must be submitted for Board approval prior to implementation

MCHS Pharmacy - Albert Lea Albert Lea
Dan Mayer 261534-004
to allow the separation of the prescription dispensing process including verification, drug
utilization review (DUR) and/or certification for new or refillable prescriptions, by more
than one pharmacist, either on-site at MCHS - Albert Lea or off-site at MCHS - Austin
Approved – One Year

MCHS - Austin Clinic Pharmacy Austin
Rick Knoll 264085-002
to allow the separation of the prescription dispensing process including verification, drug
utilization review (DUR) and/or certification for new or refillable prescriptions, by more
than one pharmacist, either on-site at MCHS - Austin or off-site at MCHS - Albert
Approved – One Year

MCHS - Austin Clinic Pharmacy Austin
Rick Knoll 264085-003
to allow the utilization of a telepharmacy in LeRoy and Blooming Prairie
Approved – One Year
Conditions listed in the letter of 12/21/2016
MCHS - Blooming Prairie Clinic Phcy  
Nancy Cope  
264087-001  
to allow exemptions from the Board's rules regarding having a pharmacist on duty at all times that the telepharmacy is open  
**Approved – One Year**  
**Conditions listed in the letter of 12/21/2016**

MCHS - Leroy Clinic Pharmacy  
Timothy Habermann  
264088-001  
to allow exemptions from the Board's rules regarding having a pharmacist on duty at all times that the telepharmacy is open  
**Approved – One Year**  
**Conditions listed in the letter of 12/21/2016**

MCHS Pharmacy - Albert Lea  
Dan Mayer  
261534-005  
policy review of central services  
**Approved**  
You are required to comply with all applicable DEA regulations

MCHS - Austin Clinic Pharmacy  
Rick Knoll  
264085-004  
policy review of central services  
**Approved**  
You are required to comply with all applicable DEA regulations

MCHS - Blooming Prairie Clinic Phcy  
Nancy Cope  
264087-002  
policy review of central services  
**Approved**  
You are required to comply with all applicable DEA regulations

MCHS - Leroy Clinic Pharmacy  
Timothy Habermann  
264088-002  
policy review of central services  
**Approved**  
You are required to comply with all applicable DEA regulations

MCHS Pharmacy - Albert Lea  
Albert Lea
You will need to revise and resubmit policies and procedures when barcode scanning is available for all steps of the dispensing process or when biometrics are utilized.

You will need to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions, by more than one pharmacist on site.

Approved – One Year

On condition that you follow the policies and procedures you submitted and that any policy changes are be highlighted within the policies and submitted for Board approval prior to implementation.
Hy-Vee Pharmacy 1559                      Savage
Carson Klug                                  Pending

to allow the pharmacy to operate a non-contiguous drive-thru

**Denied**
Submit policies and procedures to explain counseling on all prescriptions

Hy-Vee Pharmacy 1559                      Savage
Carson Klug                                  Pending

to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions by more than one pharmacist within your own facility

**Approved – Until 11/16/2017**
**On condition** that within 30 days, you submit policies and procedures for unique identifiers for Board approval

Hy-Vee Pharmacy 1559                      Savage
Carson Klug                                  Pending

to allow the pharmacist to certify prescriptions from the Iowa central fill pharmacy, as allowed via Board approved variance

**Approved – Until 07/13/2017**
**On condition** that you continue to submit the quarterly error report separating out the errors discovered at the Minnesota pharmacies and that your local pharmacy completes a 5% daily double check (quality assurance) to verify the prescriptions received from the Iowa fulfillment pharmacy are filled correctly

MCHS - Red Wing Hospital Pharmacy          Red Wing
Ryan Hinman                                  263903-002

to allow the return of unused, non-controlled substance medications to a Pyxis drawer/pocket in hospital nursing stations where the Pyxis is used as a floor-stock system and unused medications are returned by licensed nursing staff

**Denied**

Philips Neighborhood Clinic                Minneapolis
Brian Sick                                  Not Licensed

to allow the pharmacist and interns to perform the duties of the practitioner for counseling and final certification of the prescriptions

**Deferred to the Board**

**New Variances Deferred:**

None
Extensions to Current Variances:

Hy-Vee Pharmacy #1165
Matthew Sommers
Eagan
265140-002

To allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions by more than one pharmacist within your own facility

Approved – Until 11/16/2017
On condition that within 30 days, you submit policies and procedures for unique identifiers for Board approval.

Lakeview Community Pharmacy
Marcia McGowan
Stillwater
262751-002

To allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions, by more than one pharmacist

Approved – 6 Months
On condition that you keep the separation of the prescription dispensing process within your own pharmacy due to no central service policies being submitted or approved.

Lakeview Memorial Hospital Phcy - Outpatient
Scott Baird
Stillwater
261233-002

To allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions, by more than one pharmacist

Approved – 6 Months
On condition that you keep the separation of the prescription dispensing process within your own pharmacy due to no central service policies being submitted or approved.

MCHS - Mankato Hospital Phcy
Perry Sweeten
Mankato
200743-001

To allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for Mayo Clinic Health System.
MCHS - Fairmont Hospital Pharmacy
Cassica Jobe
200992-001
Fairmont
Approved – One Year
Conditions listed in the letter of 12/21/2016

to allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for MCHS - Fairmont when the hospital pharmacy is closed from normal business hours of operation

MCHS - New Prague Hospital Pharmacy
Ellen Kelly
263735-001
New Prague
Approved – One Year
Conditions listed in the letter of 12/21/2016

to allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for MCHS - New Prague when the hospital pharmacy is closed from normal business hours of operation

MCHS - Springfield Hospital Phcy
Kristina Dittrich
200325-001
Springfield
Approved – One Year
Conditions listed in the letter of 12/21/2016

to allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for MCHS - Springfield when the hospital pharmacy is closed from normal business hours of operation

MCHS – St. James Hospital Phcy
Vanda Jandl
200891-001
St. James
Approved – One Year
Conditions listed in the letter of 12/21/2016

to allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for MCHS - St. James when the hospital pharmacy is closed from normal business hours of operation

MCHS - Waseca Hospital Phcy
Kelsie Davis
200753-001
Waseca
Approved – One Year
Conditions listed in the letter of 12/21/2016

to allow remote pharmacy after hours order review and entry of physician medication orders by Mayo Clinic Health System - Mankato Hospital for MCHS - Waseca when the hospital pharmacy is closed from normal business hours of operation

pharmacies in Waseca, Springfield, St. James, Fairmont, and New Prague when the hospital pharmacies are closed from normal business hours of operation

Approved – One Year
Conditions listed in the letter of 12/21/2016
Approved – One Year
Conditions listed in the letter of 12/21/2016

Sterling Drug	Albert Lea
Thomas Michels	264434-002
to allow the utilization of a telepharmacy in Adrian

Approved – One Year
Conditions listed in the letter of 12/21/2016

Sterling Drug #4	Fairmont
Jacob Reuter	264421-002
to allow the utilization of a telepharmacy in Adrian

Approved – One Year
Conditions listed in the letter of 12/21/2016

Sterling Drug #8	Worthington
Bryan Hagen	264425-003
to allow the utilization of a telepharmacy in Adrian

Approved – One Year
Conditions listed in the letter of 12/21/2016

Sterling Drug	Adrian
Joseph Anderson	264419-001
to allow exemptions from the Board's rules regarding having a pharmacist on duty at all times that the telepharmacy is open and to be serviced by Worthington, Fairmont, and Albert Lea

Approved – One Year
On condition that you provide statistics for the back-up utilization of Fairmont and Albert Lea and additional conditions listed in the letter of 12/21/2016

With your next renewal, you must clarify in the telepharmacy technician policy that the technician has a minimum of 2,080 hours of experience as a certified technician

Sterling Long Term Care Pharmacy	Owatonna
Kortney Delaney	264431-007
to allow the pharmacy to provide an emergency kit to Beauteerre Recovery Institute

Approved – One Year
On condition that the addition of only Naloxone, Gabapentin, and Seroquel be added to the original list of drugs within the e-kit. Any changes to the e-kit content must be
determined by the quality assurance and assessment committee or equivalent. Any policy and/or e-kit content changes are to be highlighted within the policies and submitted for Board approval prior to implementation.

Thrifty White Drug #762
Andrew Weir
Plymouth
262827-007

to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for new or refillable prescriptions, by more than one pharmacist on site

**Approved – One Year**

**On condition** that within 30 days, you submit policies and procedures for unique identifiers for Board approval.

Weber & Judd Nursing Care Rx
Christopher McDonough
Rochester
261295-004

to allow the use of an emergency kit by the Season's Hospice facility

**Approved – One Year**

**On condition** that any policy and/or e-kit content changes are highlighted within the policies and submitted for Board approval prior to implementation.

**Extensions to Current Variances Deferred:**

None

**PIC Changes:**

None

**PIC Changes Deferred:**

None

**Deferred to the Board:**

Allina Health Pharmacies
Jason Meier
18 Locations

to allow the separation of the prescription certification process by more than one pharmacist on site
Deferred to the Board
The Committee recommends a denial. Resubmit complete policies and procedures

GuidePoint Pharmacy #102 Rochester
Gary Pundt 261271-003
to allow the delivery of prescriptions to the nursing staff of Assisted Living Facilities (ALF) and/or home health care offices

Deferred to the Board
The Committee recommends a denial because you did not meet the previous conditions and your policies were revised. Resubmit policies and procedures to address the following: 1. that there is a patient authorization form that is appropriate for each site; 2. when the staff member is not there to receive the prescriptions; and 3. storage conditions of the delivered medications

GuidePoint Pharmacy #108 Nisswa
Rebecca Piekarski 264109-001
to allow the utilization of a telepharmacy in Longville

Deferred to the Board
The Committee recommends a one year approval on condition that you provide statistics for the back-up utilization of Brainerd and Crosby with additional conditions listed in the letter of 12/21/2016

GuidePoint Pharmacy #101 Brainerd
Michael Schwartzwald 261373-007
to allow the utilization of a telepharmacy for emergency coverage in Longville

Deferred to the Board
The Committee recommends a one year approval on condition that you provide statistics for the back-up utilization of Brainerd and Crosby with additional conditions listed in the letter of 12/21/2016

GuidePoint Pharmacy #106 Crosby
Nicole Larson 263734-003
to allow the utilization of a telepharmacy for emergency coverage in Longville

Deferred to the Board
The Committee recommends a one year approval on condition that you provide statistics for the back-up utilization of Brainerd and Crosby with additional conditions listed in the letter of 12/21/2016
GuidePoint Pharmacy #109
Rebecca Piekarski
264101-001
to allow exemptions from the Board’s rules regarding having a pharmacist on duty at all times that the telepharmacy is open and to be serviced by Nisswa and in emergency situations by Brainerd and Crosby
Deferred to the Board
The Committee recommends a one year approval on condition that you provide statistics for the back-up utilization of Brainerd and Crosby with additional conditions listed in the letter of 12/21/2016

Walgreens Pharmacies
Michelle Aytay
to allow no physical description on the cassette label
Deferred to the Board
The Committee recommends a one year approval. With your next renewal, you must cite the correct rule number

Pharmacist Licensure Report

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