Variance Committee Report of March 2, 2022
For Board Meeting of March 16, 2022

Attendees: Rabih Nahas, James Bialke, Ame Carlson, Tim Litsey, Sarah Favour, Tracy Berg, Kyle Kolbert, David Liebow, Jason Christensen, Ryan Anderson, Josh Grabow, Tanyia Abel, John Long, Andrew Johnson, Kristine Almeida, Bill Bunzli, and Jonathan Fransen

Information for Discussion:

Coborns Central Support Pharmacy #9942
Justin Dullinger
Coborns Central Support Pharmacy's 2021 Q4 Error Report
Reviewed

CVS/Pharmacy Central Pharmacy Services
Kristin Alves
CVS/Pharmacy Central Pharmacy Services' 2021 Q4 Error Report
Reviewed

Hy-Vee Pharmacy Fulfillment Center (4016)
Jonathan Fransen
Hy-Vee Pharmacy Fulfillment Center's 2021 Q4 Error Reports
Reviewed

Meeting Appointments:

10:00
Mayo Clinic Pharmacies
David Liebow
8 Locations
to allow the pharmacy to release medications outside of the licensed pharmacy space, within the same building, or to provide curbside delivery of prescriptions

Approved - Until 9/15/2022
On condition of the following: 1. that there is no curbside delivery, if the pharmacy has a drive through; 2. that there is no curbside delivery for tele-pharmacies; 3. that the pharmacy staff delivers prescriptions to curbside; 4. that counseling occurs on all prescriptions; 5. that you incorporate a tracking log for prescriptions delivered; and, 6. that controlled substances delivered curbside meet all DEA and state regulations
Mayo Clinic Pharmacy Northeast  Rochester
Dennis Thackeray  262409-010
Denied
Due to having a drive-up

Mayo Clinic Hosp - Rochester, Methodist Campus Phcy  Rochester
Jason Christensen  200540-019
Approved - Two Years
On condition that counseling by a pharmacist meets MN Rule 6800.0910

to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for compounded products, in limited quantities of complex, urgent/emergent, hazardous, and/or high-risk products, by more than one pharmacist between Mayo Clinic Hosp - Rochester, Methodist Campus Phcy, Mayo Clinic Hosp - Rochester, St. Mary's Campus Phcy, Mayo Clinic Pharmacy Eisenberg, or Mayo Clinic Pharmacy Mary Brigh

Mayo Clinic Hosp - Rochester, St. Mary's Campus Phcy  Rochester
Ryan Anderson  201162-017
Approved - Two Years
On condition that counseling by a pharmacist meets MN Rule 6800.0910

to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for compounded products, in limited quantities of complex, urgent/emergent, hazardous, and/or high-risk products, by more than one pharmacist between Mayo Clinic Hosp - Rochester, Methodist Campus Phcy, Mayo Clinic Hosp - Rochester, St. Mary's Campus Phcy, Mayo Clinic Pharmacy Eisenberg, or Mayo Clinic Pharmacy Mary Brigh

Mayo Clinic Pharmacy - Eisenberg  Rochester
Corinne Mohr  262170-010
Approved - Two Years
On condition that counseling by a pharmacist meets MN Rule 6800.0910

to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for compounded products, in limited quantities of complex, urgent/emergent, hazardous, and/or high-risk products, by more than one pharmacist between Mayo Clinic Hosp - Rochester, Methodist Campus Phcy, Mayo Clinic Hosp - Rochester, St. Mary's Campus Phcy, Mayo Clinic Pharmacy Eisenberg, or Mayo Clinic Pharmacy Mary Brigh
Mayo Clinic Pharmacy Mary Brigh  
Kyle Kolbet  
Rochester  
262169-010  
to allow the separation of the prescription dispensing process including verification, drug utilization review (DUR) and/or certification for compounded products, in limited quantities of complex, urgent/emergent, hazardous, and/or high-risk products, by more than one pharmacist between Mayo Clinic Hosp - Rochester, Methodist Campus Phcy, Mayo Clinic Hosp - Rochester, St. Mary's Campus Phcy, Mayo Clinic Pharmacy Eisenberg, or Mayo Clinic Pharmacy Mary Brigh  
Approved - Two Years  
On condition that counseling by a pharmacist meets MN Rule 6800.0910

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 pharmacies in Waseca, St. James, Fairmont, and New Prague when the hospital pharmacies are closed from normal business hours of operation  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

MCHS - Fairmont Hospital Pharmacy  
Cassica Jobe  
Fairmont  
200992-001  
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  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

MCHS - New Prague Hospital Pharmacy  
Ellen Kelly  
New Prague  
265481-001  
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  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

MCHS - St. James Hospital Phcy  
Vanda Jandl  
St. James  
200891-001  
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  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022
MCHS - Waseca Hospital Pharmacy  
Kelsie Davis  
265482-001  
Waseca  

Approved - Two Years  
Conditions listed in the letter of 3/16/2022

10:30  
Coram CVS/specialty infusion services  
Kristin Iannuccilli  
266421-001  
Cumberland, RI  
policy review of unique identifiers for Epic operating system  
Approved

Coram CVS/specialty infusion services  
Kristin Iannuccilli  
266421-002  
Cumberland, RI  
policy review of central services between CVS/Pharmacy Central Pharmacy Services in Lincoln, RI and Coram CVS/Specialty Infusion Services in Mendota Heights - (revisions sent on 2/11/21) - (revisions sent on 2/10/22)  
Approved

Coram CVS/Specialty Infusion Services  
Tanyia Abel  
261268-003  
Mendota Heights  
policy review of central services between CVS/Pharmacy Central Pharmacy Services in Lincoln, RI and Coram CVS/Specialty Infusion Services in Mendota Heights - (revisions sent on 2/11/21) - (revisions sent on 2/10/22)  
Approved

Coram CVS/specialty infusion services  
Kristin Iannuccilli  
266421-003  
Cumberland, RI  
to allow the pharmacy (non-dispensing pharmacy) to provide patient counseling as part of the central services  
Approved - Two Years  
On condition that you submit a quarterly error report to the board and that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation
to allow the pharmacy (dispensing pharmacy) to not provide patient counseling as part of the central services

Approved - Two Years
On condition that you submit a quarterly error report to the board and that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

Coram CVS/Specialty Infusion Services
Mendota Heights
Tanyia Abel
261268-005

11:00
Children's Hospitals & Clinics of MN
Minneapolis
Kristine Manlimos
200991-005

policy review of central services of parenteral nutrition orders
Approved

Coram CVS/specialty infusion services
Cumberland, RI
Kristin Iannuccilli
266421-004

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 on site or at Coram CVS/Specialty Infusion Services in Mendota Heights - (revisions sent on 3/5/21)

Approved - Two Years
On condition that you submit a quarterly error report to the board and that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

Coram CVS/Specialty Infusion Services
Mendota Heights
Tanyia Abel
261268-002

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 on site or at CVS/Pharmacy Central Pharmacy Services in Lincoln, RI - (revisions sent on 3/5/21)

Approved - Two Years
On condition that you submit a quarterly error report to the board and that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

11:00
Children's Hospitals & Clinics of MN
Minneapolis
Kristine Manlimos
200991-007

policy review of unique identifier for Abacus
Approved
policy review of central services of parenteral nutrition orders
Approved

policy review of unique identifier for Abacus
Approved

Approved - One Year
On condition that the pharmacy conducts monthly surface sampling monitoring
With your next renewal, submit a microbiology report showing trending of any CFUs

Approved - One Year
On condition that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

policy review of Parata Express (Model 901-0060 manufacturer Parata Systems) automation
Approved
Policy Reviews:

Cub Pharmacies
Jill Landecker
80 Locations
policy review of central services - revisions sent on 2/10/22
Approved
Essentia Health Pharmacies

Amy Marchus

policy review of central services - revisions sent on 2/11/22 and addition of Ely

Approved

Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

New Variances:

Cash Wise Pharmacy #3004
Michael Hudak
Willmar
260556-004

to allow the operation of a drive-thru utilizing a pneumatic tube system

Approved - Indefinitely

On condition that the pharmacist-in-charge does not change and that your approval letter and policies and procedures are kept on file in the pharmacy with documented training of employees, for mandatory counseling on all new and refilled prescriptions that are picked up at the drive-thru. Additionally, the drive-thru equipment must have video along with audio

Coborn's Pharmacy #2006
Bradley Hircock
Little Falls
261254-002

to allow the operation of a drive-thru utilizing a pneumatic tube system

Approved - Indefinitely

On condition that the pharmacist-in-charge does not change and that your approval letter and policies and procedures are kept on file in the pharmacy with documented training of employees, for mandatory counseling on all new and refilled prescriptions that are picked up at the drive-thru. Additionally, the drive-thru equipment must have video along with audio

Coborn's Pharmacy #2008
Lisa Bullert
Clearwater
262607-003

to allow the operation of a drive-thru utilizing a pneumatic tube system

Approved - Indefinitely

On condition that the pharmacist-in-charge does not change and that your approval letter and policies and procedures are kept on file in the pharmacy with documented training of employees, for mandatory counseling on all new and refilled prescriptions that are picked up at the drive-thru. Additionally, the drive-thru equipment must have video along with audio
Approved - Indefinitely
On condition that the pharmacist-in-charge does not change and that your approval letter and policies and procedures are kept on file in the pharmacy with documented training of employees, for mandatory counseling on all new and refilled prescriptions that are picked up at the drive-thru. Additionally, the drive-thru equipment must have video along with audio.

EmbraceDNA
Alissa Huhn
Pending

to allow an exemption from the board's rule regarding the required square footage
Approved - Indefinitely
On condition that the pharmacist-in-charge and the business practice do not change and that no drugs are stored on site

EmbraceDNA
Alissa Huhn
Pending

to allow an exemption from the board's rule regarding having certain equipment
Approved - Indefinitely
On condition that the pharmacist-in-charge and the business practice do not change and that no drugs are stored on site

Essentia Health Ely Pharmacy
Michael Reuter
Ely
Approved - Until 9/30/2023
On condition that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation.
St. Cloud Hospital Infusion Pharmacy  St. Cloud
William Kuhlman  262071-005

to allow the pharmacy to utilize a non-contiguous space that only has 95 square feet and walls that are not floor to permanent ceiling, as a satellite pharmacy, for 2 pharmacist workstations

**Approved - Indefinitely**

**On condition** that the pharmacist-in-charge and the scope of work in this space remain the same and no drugs are stored in this space. Additionally, the space must pass an inspection conducted by a board surveyor

The Apothecary  Sartell
Stephen Anderson  263665-001
to allow the pharmacy to utilize a space that is adjacent to the pharmacy for a pharmacy lab expansion

**Approved - Indefinitely**

**On condition** that the pharmacist-in-charge remains the same and that the technicians are directly supervised by a pharmacist while they are in the lab space. Additionally, you must notify a board surveyor when the lab space becomes operational

**Renewal Variances:**

Capsule Pharmacy  Minneapolis
Elizabeth Shyu  265955-001
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 or at Capsule Pharmacy located in New Providence, NJ

**Approved - Two Years**

**On condition** that in your pharmacy, you post the MN licenses/registrations of the NJ staff that are engaged in central services and that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for Board approval prior to implementation. The board also expects the pharmacist-in-charge to monitor prescription errors and maintain documentation of corrective and preventative actions taken which is available to the board for review upon request

Capsule Pharmacy  New Providence, NJ
Vicki Jung  266216-001
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 or at Capsule Pharmacy located in Minneapolis, MN

**Approved - Two Years**

**On condition** that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation
to allow remote pharmacy after hours order review and entry of physician medication orders by ePharmacist Direct (Catholic Health Initiatives) in Fargo, ND for LifeCare Medical Center, St. Francis Medical Center, Lakewood Health, St. Gabriels Hospital, St. Joseph's Area Health Services, and Stevens Community Medical Center when the hospital pharmacies are closed from normal business hours of operation - (revised 11/19/20 to include on demand daytime hours when the pharmacist is not on duty for Lakewood Health)

Approved - Two Years
Conditions listed in the letter of 3/16/2022

ePharmacist Direct (Breckenridge)
Karen Finck
264443-004

to allow remote pharmacy after hours order review and entry of physician medication orders by ePharmacist Direct (Breckenridge) for Lakewood Health, Lifecare Medical Center, St. Francis Medical Center, St. Gabriels Hospital, St. Joseph's Area Health Services, and Stevens Community Medical Center when the hospital pharmacies are closed after normal business hours of operation - (revised 11/19/20 to include on demand daytime hours when the pharmacist is not on duty for Lakewood Health)

Approved - Two Years
Conditions listed in the letter of 3/16/2022

ePharmacist Direct Associated Pharmacies
Karen Finck
6 Locations

to allow remote pharmacy after hours order review and entry of physician medication orders by ePharmacist Direct (Catholic Health Initiatives) in Fargo, ND for the associated pharmacy when the hospital pharmacy is closed from normal business hours of operation - (revised 11/19/20 to include on demand daytime hours when the pharmacist is not on duty)

Approved - Two Years
Conditions listed in the letter of 3/16/2022

ePharmacist Direct (Breckenridge) Associated Pharmacies
Karen Finck
6 Locations

to allow remote pharmacy after hours order review and entry of physician medication orders by ePharmacist Direct (Breckenridge) for the associated pharmacy when the hospital pharmacy is closed after normal business hours of operation - (revised 11/19/20 to include on demand daytime hours when the pharmacist is not on duty)

Approved - Two Years
Conditions listed in the letter of 3/16/2022
Olmsted Medical Center Chatfield Pharmacy  
Matthew Hill  
Chatfield  
265963-001  
to allow the delivery of prescriptions to the nursing staff of Assisted Living Facilities (ALF) and/or home health care offices  
**Approved - One Year**  
**On condition** that the variance is renewed prior to the expiration date in order to deliver prescriptions in this manner. Note, this variance previously expired 8/19/2021

PharMerica  
Blair Miller  
Fridley  
261548-019  
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 - Three Years**  
**On condition** that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation

Polaris Pharmacy Services of MN, LLC  
Neal Uitto  
St. Louis Park  
265679-005  
to allow a greater number of permitted emergency medications in the CUBEX  
**Approved - 6 Months**  
**On condition** that you follow your approved policies and procedures. Any changes in the policies and procedures would need to be highlighted and submitted for board approval prior to implementation  
**With your next renewal**, submit policies and procedures that address after-hour pharmacist coverage for controlled substances and medications that are not on override, since the pharmacy is no longer open 24/7. Note, this variance expired on 7/24/2020 (different PIC)

St. Luke's Hospital Pharmacy  
Anne Schapman  
Duluth  
200442-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. Luke's Hospital for Bigfork Valley Hospital, Community Memorial Hospital, North Shore Health, Cook Hospital, and Lake View Memorial Hospital, when the hospital pharmacies are closed after normal business hours of operation  
**Approved - Two Years**  
**Conditions listed in the letter of 3/16/2022**
Bigfork Valley Hospital Pharmacy  
Sara Elioff  
Bigfork  
261307-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. 
Luke’s Hospital for Bigfork Valley Hospital when the hospital pharmacy is closed after normal business 
hours of operation  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

Community Memorial Hospital Pharmacy  
Marcia Hoeffling  
Cloquet  
200999-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. 
Luke’s Hospital for Community Memorial Hospital when the hospital pharmacy is closed from normal 
business hours of operation  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

Cook Hospital Pharmacy  
Anthony Menart  
Cook  
260751-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. 
Luke’s Hospital for Cook Hospital when the hospital pharmacy is closed from normal business hours of 
operation  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

Lake View Memorial Hospital Pharmacy  
Christine Dearing  
Two Harbors  
200530-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. 
Luke’s Hospital for Lake View Memorial Hospital when the hospital pharmacy is closed from normal 
business hours of operation  
Approved - Two Years  
Conditions listed in the letter of 3/16/2022

North Shore Health  
Deidre LaRock-Muggley  
Grand Marais  
200296-002  
to allow remote pharmacy after hours order review and entry of physician medication orders by St. 
Luke’s Hospital Pharmacy for North Shore Health when the hospital pharmacy is closed after normal 
business hours of operation  
Approved - Two Years  
Conditions listed in the letter of 03/16/2022
to allow remote pharmacy after hours order review and entry of physician medication orders by St. Mary's Medical Center for SMDC Medical Center Miller-Dwan when the hospital pharmacy is closed after normal business hours of operation

**Approved - One Year**

**Conditions listed in the letter of 3/16/2022.** Furthermore, consider additional pharmacist coverage at 5am to assist with workload

**With your next renewal,** provide feedback of staffing modifications that were made during the previous 12 months to assist with the workload

SMDC Medical Center Miller-Dwan  
Julia Sybrant  
Duluth  
261515-001

to allow remote pharmacy after hours order review and entry of physician medication orders by St. Mary's Medical Center for SMDC Medical Center Miller-Dwan when the hospital pharmacy is closed after normal business hours of operation

**Approved - One Year**

**Conditions listed in the letter of 03/16/2022**

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**Deferred to the Board:**

Fairview Pharmacy Long Term Care  
Kevin Johnson  
Minneapolis  
263698-015

to allow the pharmacy to provide an emergency kit to Twin Cities Orthopedics Excel Care Suites, a licensed comprehensive home care provider

**Deferred to the Board**

The Committee recommends a denial because the proposed manner in which the pharmacy would provide an emergency kit does not meet the regulation. Furthermore, this would not comply with MDH regulations pertaining to comprehensive home care providers. Note, Twin Cities Orthopedics Excel Care Suites is not an MDH licensed comprehensive home care provider

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Fairview Ridges Hospital Pharmacy  
Kelly Ferkul  
Burnsville  
260113-016

to allow the pharmacy to temporarily utilize a conference room that is adjacent to the pharmacy and has a wall that is not floor to permanent ceiling, during remodeling, for the storage of supplies and legend drugs

**Deferred to the Board**

The Committee recommends a denial. Your request does not meet or exceed the rule for which the variance is being requested. You should explore the use of office space within the pharmacy to store drugs. You would not need a variance to store supplies in the conference room
Fairview Specialty Services Pharmacy
Jacob Hansen
Minneapolis
262542-013

to allow a technician to pharmacist ratio of 4:1 in the main call center area (limited to phone technician job description) - (revisions sent on 4/13/18 to include a designated area in the adjacent call center room) - (revisions sent on 2/11/22 to the seating chart)

Deferred to the Board
The Committee recommends a denial of the revisions to the seating chart due to lack of proper pharmacist supervision. The previous variance and seating chart remain in effect until 5/5/2024. The committee recommends having a 3:1 ratio in the new expanded space

Grand Itasca Pharmacy
David Johnson
Grand Rapids
264518-001

to allow the pharmacy to provide curbside delivery of prescriptions

Deferred to the Board
The Committee recommends an approval until 10/27/2022 on the following conditions: 1. that there is no curbside delivery, if the pharmacy has a drive through; 2. that there is no curbside delivery for tele-pharmacies; 3. that the pharmacy staff delivers prescriptions to curbside; 4. that counseling occurs on all prescriptions; 5. that you incorporate a tracking log for prescriptions delivered; and, 6. that controlled substances delivered curbside meet all DEA and state regulations

Mercy Hospital Unity Campus Inpatient Pharmacy
Megan Nelson
Fridley
260414-003

to allow remote pharmacy after hours order review and entry of physician medication orders by Mercy Hospital Unity Campus Inpatient Pharmacy for River's Edge Hospital & Clinic, Cuyuna Regional Medical Center, Riverwood Healthcare Center, and Glencoe Regional Health Services when the hospital pharmacies are closed after normal business hours of operation

Deferred to the Board
The Committee recommends a one year approval with conditions listed in the letter of 3/16/2022. Furthermore, consider additional pharmacist coverage between 11pm-1am to assist with workload. With your next renewal, provide feedback of staffing modifications that were made during the previous 12 months to assist with the workload

Cuyuna Regional Medical Center Pharmacy
Michael Austin
Crosby
265134-001

to allow remote pharmacy after hours order review and entry of physician medication orders by Mercy Hospital Unity Campus Inpatient Pharmacy for Cuyuna Regional Medical Center when the hospital pharmacy is closed after normal business hours of operation

Deferred to the Board
The Committee recommends a one year approval with conditions listed in the letter of 3/16/2022
Glencoe Regional Health Services Pharmacy  
Amy Dittmer  
201001-004  
to allow remote pharmacy after hours order review and entry of physician medication orders by Mercy Hospital Unity Campus Inpatient Pharmacy for Glencoe Regional Health Services when the hospital pharmacy is closed after normal business hours of operation
**Deferred to the Board**  
The Committee recommends a one year approval with conditions listed in the letter of 3/16/2022

River's Edge Hospital and Clinic Pharmacy  
Shirley Miller  
200740-001  
to allow remote pharmacy after hours order review and entry of physician medication orders by Mercy Hospital Unity Campus Inpatient Pharmacy for River's Edge Hospital and Clinic when the hospital pharmacy is closed from normal business hours of operation
**Deferred to the Board**  
The Committee recommends a one year approval with conditions listed in the letter of 3/16/2022

Riverwood Healthcare Center Pharmacy  
Spencer Page  
200446-005  
to allow remote pharmacy after hours order review and entry of physician medication orders by Mercy Hospital Unity Campus Inpatient Pharmacy for Riverwood Healthcare Center when the hospital pharmacy is closed after normal business hours of operation
**Deferred to the Board**  
The Committee recommends a one year approval with conditions listed in the letter of 3/16/2022