



California State Board of Pharmacy
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Business, Consumer Services and Housing Agency
Department of Consumer Affairs
Gavin Newsom, Governor



To: Board Members

Subject: Agenda Item IV. Discussion and Consideration of Proposal to Modify Title 16, California Code of Regulations Section 1749 Related to Fees, Including Review of Public Comments and, Potentially, Modified Text

Background:

At the December 2018 Board meeting, the board approved proposed text to amend Section 1749 of Title 16, CCR, related to the board's fee schedule. This proposal updates the board's fee schedule by increasing the board's fees to address the structural imbalance within the board's budget.

As required by the Administrative Procedure Act, board staff released the proposed text for the 45-day comment period on April 26, 2019, which ended on June 10, 2019. The proposed text and comments are attached following this memo.

Summarized 45-day Comments Regarding Fees with Board Staff Recommendations:

Written Comments from Audrey Paules, Pharmacist

Comment: Ms. Paules expressed concern that fees have been increased by 40% for some licensees, while others (wholesalers, non-resident wholesalers, and 3PLs) are only increasing 5%. Ms. Paules questioned how the 5% increase was justified. Additionally, Ms. Paules expressed concern that chain stores are decreasing pharmacist wages.

Board Staff Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the statutory minimum and maximum are set in statute (Business and Professions Code (B&P) section 4400). The fee schedule established in statute was based upon a fee analysis conducted by the Department of Consumer Affairs and was vetted as part of the board's Sunset Review Process. The fee analysis assessed fees separately, including the cost to deliver the various services. This review resulted in variations in percentages of growth in fees as historically the board's fee structure provided subsidies between the license types.

As indicated in the Initial Statement of Reasons, the board must eliminate the structural imbalance in its budget immediately to ensure the financial viability of the board. The proposed regulation increases the board's fees to the statutory maximum, which will resolve the imbalance and slowly restore the board's depleted fund reserve. Increasing all license types by the same percent increase (5%) would not eliminate the structural imbalance and would not begin restoring the board's mandatory 1-year reserve fund. Additionally, board staff notes that

the board does not have regulatory jurisdiction over employee wages within California.

Written Comments from Gerald Tung

Comment: Mr. Tung indicated that he is opposed to the fee increase because licensee salaries have not increased with inflation and prescription reimbursements are decreasing. Additionally, Mr. Tung indicates that the board's fees have increased in the last five years and it is unreasonable to increase the fees again. Finally, Mr. Tung indicated that an increase in the licensee population should provide an increase in revenue for the operation of the board.

Response to Comment: The board staff recommend that this comment be rejected. While the board's fees did increase effective July 2017, not all the fees were increased at that time. Of the board's 118 fees, seven application fees and 14 renewal fees were increased, while three application fees were reduced. While revenue has increased significantly since FY 2016-17, it is not increasing at the same rate as the board's expenditures, which has created a structural imbalance and the board's reserve fund is quickly depleting. Increasing the fees to the statutory maximum will eliminate the structural imbalance and begin restoring the board's reserve fund.

Written Comments from Jared Sewall, Pharmacist

Comment: While Mr. Sewall expressed concern about the fee increase, specifically, the renewal fee for pharmacists. Mr. Sewall indicates that the board review its budget and spending if a budget deficit is taking place. Additionally, Mr. Sewall states that it is "unreasonable and absolutely absurd to raise fees on entities and persons to fund an organization that provides no benefit to these parties." Mr. Sewall states that the State and taxpayers need to provide the additional resources that the board needs.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the board does not take fee increases lightly and reviews its budget and expenditures frequently. Additionally, board staff does not agree that licensees receive no benefit from the board as the board provides numerous free outreach programs for licensees and several free continuing education opportunities. Finally, the board is a self-funded agency, which means that the board's revenue is obtained from its application and renewal fees. The board does not obtain revenue from the State's general fund (i.e. tax revenue).

Written Comments from Linda Goetz, Pharmacy Technician

Comment: Ms. Goetz opposed the fee increase for pharmacy technicians. She indicated that due to tax law changes, technicians can no longer write off their renewal fees and the 39% fee increase would cause a financial strain.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the fees for pharmacy technicians are increasing from a biennial fee of \$140 to a biennial fee of \$195. The increase, split over two years, amounts to a yearly increase of \$27.50, which board staff believes to be a manageable increase.

Written Comments from Omeed Askari

Comment: Mr. Askair indicated that the board recently raised all its renewal fees and added a new license requirement (automated delivery systems), which has resulted in an added cost and business resources to remain compliant. Mr. Askair indicated that he does not believe that the board thoroughly considers the repercussions of its actions with raising fees and passes new regulations. He indicated that the board should address the fraudulent practice of insurance-owned pharmacies and that the governments job is to level the playing field. He indicated that the fee increase will “disenfranchise” independent pharmacies in favor of corporate health care companies.

Response to Comment: The board staff recommend that this comment be rejected. While the board’s fees did increase effective July 2017, not all the fees were increased at that time. Of the board’s 118 fees, seven application fees and 14 renewal fees were increased, while three application fees were reduced. Additionally, board staff notes that the new license requirement for automated delivery systems was established by legislation and not as a result of board regulations. Finally, board staff notes that Mr. Askair’s comments go beyond the scope of this regulation. Board staff also notes that as part of any rulemaking package, the fiscal and economic impacts are required to be identified and published under the provisions of the Administrative Procedures Act.

Written Comments from Pravin Patel, Pharmacist

Comment: Mr. Patel indicated he does not see justification for the fee increase for pharmacists and requested the retired senior pharmacists be exempt from the fee increase.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the fee increase is necessary to ensure that the board has sufficient resources to maintain current operations to meet its consumer protection mandate and to slowly restore its reserve fund. Additionally, board staff notes that a pharmacist, who is retired and does not plan on returning to work, can “retire” their license and would no longer be required to pay the license renewal fee (B&P 4200.5). The onetime fee for a retired license is \$45.00.

Written Comments from Kiritkumar Patel, Pharmacist

Comment: Mr. Patel indicated he opposes the fee increase due to cost of living and inflation for pharmacists and requested the retired senior pharmacists be exempt from the fee increase.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the fee increase is necessary to ensure that the board has sufficient resources to maintain current operations to meet its consumer protection mandate and to slowly restore its reserve fund. Additionally, board staff notes that a pharmacist, who is retired and does not plan on returning to work, can “retire” their license and would no longer be required to pay the license renewal fee (B&P 4200.5). The onetime fee for a retired license is \$45.00.

Written Comments from Rosalie Weber, Pharm.D.

Comment: Dr. Weber expressed concern about the fee increase for sterile compounding

pharmacies. She requested that the board consider the possible financial strain to independent pharmacies.

Response to Comment: Board staff recommend that this comment be rejected. The proposed regulation increases all the board's fees to the statutory maximum. Additionally, the fee increase is necessary to ensure that the board has sufficient resources to maintain current operations to meet its consumer protection mandate and to slowly restore its reserve fund. The fees for all sterile compounding licensees within California are the same and not based on ownership structure. The board's current fee structure is working to eliminate fee subsidies between licensing programs and be more directly tied to the costs to deliver the associated services.

Written Comments from Shannon Quijano, Pharm.D.

Comment: Dr. Quijano indicated that she has loans to pay and has to commute to her job so she cannot afford another fee. She indicated that the board should get money from the increase in the licensee population and not by raising fee. Additionally, she indicated that if a fee increase is needed, the board should only raise the fees by 10%.

Response to Comment: The board staff recommend that this comment be rejected. While revenue has increased significantly since FY 2016-17, it is not increasing at the same rate as the board's expenditures, which has created a structural imbalance and the board's reserve fund is quickly depleting. Increasing the fees to the statutory maximum will eliminate the structural imbalance and begin restoring the board's reserve fund. Raising fees by 10% as proposed by this commenter would not sufficiently address the board's structural imbalance and would result in the board's fund going insolvent.

Written Comments from Teresa Nguyen, Pharmacist

Comment: Ms. Nguyen indicated that she is opposed to the fee increase because of the cost of malpractice insurance, CE courses, and other daily expenses. She requested that the proposal be reconsidered.

Response to Comment: The board staff recommend that this comment be rejected. The costs of malpractice insurance and other daily expenses are outside of the board's control. Rather, the board's mandate is consumer protection. Board staff notes that as part of its mandate, the board provides several free continuing education opportunities and numerous free outreach programs for licensees. Additionally, this proposal is necessary to ensure the solvency of the board to maintain operations. Without a fee increase, the board will become insolvent and be unable to protect the residents of California.

Written Comments from Vadim Poznyak, Pharm.D.

Comment: Dr. Poznyak requested that the board consider other options to help mitigate the cost of the license renewals due to the increasing cost of living in California. While he understands the new for the fee increase, he recommended that the board look at utilizing technology to reduce costs, i.e. digital meetings or allow for volunteer work.

Response to Comment: The board staff recommend that this comment be rejected. This proposal is necessary to ensure the solvency of the board to maintain operations. Currently, the board does webcast its board meetings; however, the board does not have the technology to hold digital meetings and still comply with the Bagley-Keene Open Meeting Act. The board is in the initial phases of the business modernization process. As part of this process, the board assess for opportunities to streamline processes and leverage technology. In addition, outside assessments are done as well. This process is expected to ultimately result in improved business functionality and better customer engagement. Regrettably, this process takes several years. However, once completed and implemented, should significant cost savings be realized, the board can reassess its fee structure and determine if fees should be reduced either via the regulation process or statutorily.

Written Comments from Kamal Parekh, Pharmacist

Comment: Mr. Parekh opposes the 40% increase in all the fees. Mr. Parekh indicated that he is opposed to the fee increase because licensee salaries and prescription reimbursements are decreasing. Mr. Parekh requests that the board only raise the fees by 10%.

Response to Comment: The board staff recommend that this comment be rejected. This proposal is necessary to ensure the solvency of the board to maintain operations. Without a fee increase, the board will become insolvent and be unable to protect the residents of California. Raising fees by 10% as proposed by this commenter would not sufficiently address the board's structural imbalance and would result in the board's fund going insolvent.

Written Comments from Allyson Vander Broek, Pharmacist

Comment: Ms. Vander Broek opposes the increase in the renewal fee for pharmacists. Ms. Vander Broek indicated that the renewal fee for pharmacists was increased in 2017 and opposed the percent increase compared to other licensees. Ms. Vander Broek requested a full public disclosure of where the board's money is being spent.

Response to Comment: The board staff recommend that this comment be rejected. While the board's fees did increase effective July 2017, not all the fees were increased at that time. Of the board's 118 fees, seven application fees and 14 renewal fees were increased, while three application fees were reduced. Board staff notes that as part of the rulemaking package, the board provided three different board fund condition analyses. Board staff also notes that the board does not take fee increases lightly and reviews its budget and expenditures at each quarterly public board meeting. This proposal is necessary to ensure the solvency of the board to maintain operations. Without a fee increase, the board will become insolvent and be unable to protect the residents of California.

Written Comments from Kirit Merchant, Pharmacist

Comment: Mr. Merchant indicated he opposes the fee increase due to cost of living and inflation for pharmacists. Mr. Merchant indicated that retired senior pharmacists have limited income and the fee increase will make it difficult to supplement his income. He has requested that the board consider other alternatives.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the board considered not raising fees and also considered updating its fee schedule to the mid-point between the statutory minimum and maximum as specified within B&P sections 4400, 4119.01, 4180.5, and 4202.5. However, these alternatives were rejected as the board would be insolvent and unable to maintain operations and would not restore the board's reserve fund in a timely manner, which would jeopardize the health, safety, and welfare of California residents. This fee increase is necessary to ensure that the board has sufficient resources to maintain current operations to meet its consumer protection mandate and to slowly restore its reserve fund.

Written Comments from Dilipkumar Amin, Pharmacist

Comment: Mr. Amin indicated he does not see justification for the fee increase for pharmacists and requested the retired senior pharmacists be exempt from the fee increase.

Response to Comment: The board staff recommend that this comment be rejected. Board staff notes that the fee increase is necessary to ensure that the board has sufficient resources to maintain current operations to meet its consumer protection mandate and to slowly restore its reserve fund. Additionally, board staff notes that a pharmacist, who is retired and does not plan on returning to work, can "retire" their license and would no longer be required to pay the license renewal fee (B&P 4200.5). The onetime fee for a retired license is \$45.00.

Written Comments from Elizabeth Johnson, Pharmacist

Comment: Ms. Johnson indicated that she opposes the fee increase for pharmacists to the statutory maximum as the renewal fee was just raised two years ago. Ms. Johnson has requested a more transparent accounting of the board's expenditures.

Response to Comment: The board staff recommend that this comment be rejected. While the board's fees did increase effective July 2017, not all the fees were increased at that time. Of the board's 118 fees, seven application fees and 14 renewal fees were increased, while three application fees were reduced. Board staff notes that as part of the rulemaking package, the board provided three different board fund condition analyses. Board staff also notes that the board does not take fee increases lightly and reviews its budget and expenditures at each quarterly public board meeting. This proposal is necessary to ensure the solvency of the board to maintain operations. Without a fee increase, the board will become insolvent and be unable to protect the residents of California.

Staff Recommendation: Adopt the regulation language as noticed. Should the board agree with the staff recommendation, the following motion could be used.

MOTION: Adopt the regulation language as noticed on April 26, 2019, and delegate to the executive officer the authority to make technical or non-substantive changes as may be required by a Control agency to complete the rulemaking file.

Title 16. Board of Pharmacy Proposed Text

Proposed changes to the current regulation language are shown by strikethrough for deleted language and underline for added language.

Proposal to Amend section 1749 in Article 6 of Division 17 of Title 16 California Code of Regulations to read as follows:

1749. Fee Schedule.

The ~~application, renewal, penalties, and other fees, unless otherwise specified, for the issuance and renewal of licenses, certificates, and permits, and the penalties to be assessed for failure to renew in accordance with section 163.5 of the Business and Professions Code and Pharmacy Law~~ are hereby fixed as follows:

- (a) The fee for the issuance of any pharmacy license, including a remote dispensing site pharmacy license, is ~~five hundred twenty dollars (\$520)~~ five hundred seventy dollars (\$570). The fee for the annual renewal of any pharmacy license, including a remote dispensing site pharmacy license, is ~~six hundred sixty five dollars (\$665)~~ nine hundred and thirty dollars (\$930). The penalty for failure to renew is one hundred fifty dollars (\$150).
- (b) The fee for the issuance of any temporary pharmacy license is three hundred twenty-five dollars (\$325).
- (c) The fee for the issuance of a pharmacy technician license ~~is shall be one hundred and forty dollars (\$140)~~ one hundred ninety-five dollars (\$195). The fee for the biennial renewal of a pharmacy technician license ~~is shall be one hundred forty dollars (\$140)~~ one hundred ninety-five dollars (\$195). The penalty for failure to renew a ~~pharmacy technician license~~ is ~~seventy dollars (\$70)~~ ninety-seven dollars and fifty cents (\$97.50).
- (d) The application fee for ~~application and~~ examination as a pharmacist is ~~two hundred sixty dollars (\$260)~~ two hundred eighty-five dollars (\$285).
- (e) The fee for regrading an examination is one hundred fifteen dollars (\$115).
- (f)(1) The fee for the issuance of an original pharmacist license is ~~one hundred ninety-five dollars (\$195)~~ two hundred and fifteen dollars (\$215).
- (2) The application fee for ~~application of~~ an advanced practice pharmacist license is three hundred dollars (\$300). If granted, there is no fee for the initial license issued, which will expire at the same time the pharmacist's license expires.
- (g)(1) The fee for the biennial renewal of a pharmacist's license is ~~three hundred sixty dollars (\$360)~~ five hundred five dollars (\$505). The penalty fee for failure to renew is one hundred fifty dollars (\$150).
- (2) The fee for the biennial renewal of an advanced practice pharmacist license is three hundred dollars (\$300). The penalty fee for failure to renew is one hundred fifty dollars (\$150). The fees in this paragraph are in addition to the fees required to renew the pharmacist's license as specified in paragraph 1.

- (h) ~~The fee for the issuance or renewal of a wholesaler or third-party logistics provider license is seven hundred eighty dollars (\$780)~~ eight hundred twenty dollars (\$820). The fee for the annual renewal of a wholesaler or third-party logistics provider license is eight hundred twenty dollars (\$820). The penalty for failure to renew is one hundred fifty dollars (\$150). The fee for a temporary wholesaler or third-party logistics provider license is seven hundred fifteen dollars (\$715).
- (i) The fee for the issuance of a hypodermic license is ~~one hundred seventy dollars (\$170)~~ two hundred forty dollars (\$240). The fee for the annual renewal of a hypodermic needle license is two hundred eighty dollars ~~(\$200)~~ (\$280). The penalty for failure to renew is one hundred forty dollars ~~(\$100)~~ (\$140).
- (j) The fee for the issuance of a ~~license as a designated representative license~~ pursuant to Section 4053 of the Business and Professions Code, ~~or a designated representative-3PL license~~ pursuant to Section 4053.1 of the Business and Professions Code, ~~or a designated representative-reverse distributor license~~ pursuant to Section 4053.2 of the Business and Professions Code, is ~~one hundred fifty dollars (\$150)~~ two hundred ten dollars (\$210). The fee for the annual renewal of a license as a designated representative, ~~or designated representative-3PL, or a designated representative-reverse distributor~~ is shall be two hundred and fifteen dollars (\$215) ~~three hundred dollars (\$300)~~. The penalty for failure to renew is ~~one hundred seven dollars and fifty cents (\$107.50)~~ one hundred fifty dollars (\$150).
- (k) The application fee for the application or renewal of a license as a nonresident wholesaler or nonresident third-party logistics provider is ~~seven hundred eighty dollars (\$780)~~ eight hundred twenty dollars (\$820). The fee for the annual renewal of a nonresident wholesaler or nonresident third-party logistics provider is eight hundred twenty dollars (\$820). The penalty for failure to renew is one hundred fifty dollars (\$150). The fee for a nonresident wholesaler or nonresident third-party logistics provider temporary license is seven hundred fifteen dollars (\$715).
- (l) The fee for an intern pharmacist license is ~~one hundred sixty five dollars (\$165)~~ two hundred thirty dollars (\$230). The fee for transfer of intern hours or verification of licensure to another state is thirty dollars (\$30).
- (m) The fee for the reissuance of any ~~permit, license, or certificate~~, or renewal thereof, which must be reissued because of change in the information, other than name change, is one hundred thirty dollars ~~(\$100)~~ (\$130).
- (n) The fee for the reissuance of any license that has been lost or destroyed or reissued due to a name change is forty-five dollars (\$45).
- (o) The fee for evaluation of continuing education courses for accreditation is forty dollars (\$40) for each hour of accreditation requested.
- (p) The fee for the issuance of a clinic license is ~~five hundred twenty dollars (\$520)~~ five hundred seventy dollars (\$570). The fee for the annual renewal of a clinic license is ~~three hundred twenty five dollars (\$325)~~ three hundred sixty dollars (\$360). The penalty for failure to renew is one hundred fifty dollars (\$150).
- (q) The fee for the issuance of a nongovernmental license to compound sterile drug ~~products preparations~~ or a hospital satellite compounding pharmacy license is ~~one thousand six hundred forty five dollars (\$1,645)~~ two thousand three hundred five dollars (\$2,305). The fee for the annual renewal of a nongovernmental license to

compound sterile drug products/preparations or a hospital satellite compounding pharmacy license is ~~one thousand three hundred twenty-five dollars (\$1,325)~~ one thousand eight hundred fifty-five dollars (\$1,855). The penalty for failure to renew a nongovernmental license to compound sterile drug preparations or a hospital satellite compounding pharmacy license is one hundred fifty dollars (\$150). The fee for a nongovernmental temporary license to compound sterile drug preparations or a hospital satellite compounding pharmacy temporary license is ~~five hundred fifty dollars (\$550)~~ seven hundred fifteen dollars (\$715).

- (r) The fee for the issuance of a nonresident sterile compounding pharmacy is ~~two thousand three hundred eighty dollars (\$2,380)~~ three thousand three hundred thirty-five dollars (\$3,335). The fee for the annual renewal of nonresident sterile compounding pharmacy license is ~~two thousand two hundred seventy dollars (\$2,270)~~ three thousand one hundred eighty dollars (\$3,180). The penalty for failure to renew is one hundred fifty dollars (\$150). The fee for a temporary nonresident sterile compounding pharmacy license is ~~five hundred fifty dollars (\$550)~~ seven hundred fifteen dollars (\$715).
- (s) The fee for the issuance of a license as a designated representative for a veterinary food-animal drug retailer is ~~one hundred fifty dollars (\$150)~~ two hundred ten dollars (\$210). The fee for the annual renewal of a license as a designated representative for a veterinary food-animal drug retailer is ~~two hundred fifteen dollars (\$215)~~ three hundred dollars (\$300). The penalty for failure to renew is ~~one hundred seven dollars and fifty cents (\$107.50)~~ one hundred fifty dollars (\$150).
- (t) The fee for a veterinary food-animal drug retailer license is ~~four hundred and thirty-five dollars (\$435)~~ six hundred ten dollars (\$610). The application fee for the annual renewal for a veterinary food-animal drug retailer is ~~three hundred thirty dollars (\$330)~~ four hundred sixty dollars (\$460). The fee for the issuance of a veterinary food-animal drug retailer temporary license is two hundred and fifty dollars (\$250). The penalty for failure to renew is one hundred fifty dollars (\$150).
- (u) The fee for the issuance of a retired pharmacist license shall be forty-five dollars (\$45).
- (v) The fee for the issuance of a centralized hospital packaging pharmacy license is ~~eight hundred twenty dollars (\$820)~~ one thousand one hundred fifty dollars (\$1,150). The fee for the annual renewal fee for of a centralized hospital packaging pharmacy license is ~~eight hundred five dollars (\$805)~~ one thousand one hundred twenty five dollars (\$1,125). The penalty for failure to renew is one hundred fifty dollars (\$150).
- (w) The fee for the issuance of an outsourcing facility license is ~~two thousand two hundred seventy dollars (\$2,270)~~ three thousand one hundred eighty dollars (\$3,180). The annual renewal fee for the annual renewal of an outsourcing facility is ~~one thousand three hundred twenty-five dollars (\$1,325)~~ one thousand eight hundred fifty-five dollars (\$1,855). The penalty for failure to renew is one hundred fifty dollars (\$150). The fee for an temporary outsourcing facility temporary license is seven hundred fifteen dollars (\$715).
- (x) The fee for the issuance of a nonresident outsourcing facility license is ~~two thousand three hundred eighty dollars (\$2,380)~~ three thousand three hundred thirty-five dollars (\$3,335). The fee for the annual renewal fee for of a nonresident outsourcing facility

is ~~two thousand two hundred seventy dollars (\$2,270)~~ three thousand one hundred eighty dollars (\$3,180). The penalty for failure to renew is one hundred fifty dollars (\$150). The fee for a nonresident outsourcing facility temporary license is seven hundred fifteen dollars (\$715).

(y) The fee for the issuance of a correctional clinic license that is not owned by the state is five hundred seventy dollars (\$570). The annual renewal application fee for a correctional clinic license is three hundred sixty dollars (\$360). The penalty for failure to renew is one hundred fifty dollars (\$150).

(z) The application and initial license fee for operation of an EMSADDS is one hundred dollars (\$100). The application fee for the annual renewal of an EMSADDS is one hundred dollars (\$100). The penalty for failure to renew is thirty-five dollars (\$35).

(aa) The application fee of a co-location clinic license is seven hundred fifty dollars (\$750).

(ab) The application and initial license fee for a designated paramedic license is one hundred and forty dollars (\$140). The application fee for the biennial renewal of a designated paramedic license is one hundred forty dollars (\$140). The penalty for failure to renew a designated paramedic license is sixty-five dollars (\$65).

Note: Authority cited: Sections 4005 and 4400, Business and Professions Code.

Reference: Sections 163.5, 4005, 4044.3, 4053, 4053.1, 4110, 4112, 4119.01, 4120, 4127.1, 4127.15, 4127.2, 4128.2, 4129.1, 4129.2, 4129.8, 4130, 4160, 4161, 4180, 4180.5, 4187, 4190, 4196, 4200, 4202, 4202.5, 4203, 4208, 4210, 4304, 4400, 4401 and 4403, Business and Professions Code.

**Agenda Item IV. Discussion and Consideration of Proposal to Modify Title 16,
California Code of Regulations Section 1749 Related to Fees, Including Review of
Public Comments and, Potentially, Modified Text**

A hardcopy of the comments received during the 45-day comment period which ended on June 10, 2019, will be made available at the meeting or upon request. Requests may be emailed to lori.martinez@dca.ca.gov.