

RECOMMENDATION REPORT

MEETING DATE: 6/1/23 **TOTAL REC.** #: 103 **REPORT DATE**: 5/12/23

TO: Deputy Director, Kelly Anderson-Thomas

THROUGH: Chief Counsel, Christopher Riggs

FROM: Director of Licensing, Megan Tagliaferri,

Director of Compliance and Investigations, Paul Urbish

BACKGROUND

On August 19, 2021, the Cannabis Regulatory Commission (herein referenced as "Commission" or "CRC") adopted rules pursuant to P.L. 2021, C.16 which established the licensure process for cannabis businesses and testing laboratories. N.J.A.C. 17:30-6 through 7 outlines the application process and requirements for both conditional license applicants and annual license applicants. The rules also include the eligibility requirements and limitations for Social Equity Businesses, Diversely-Owned Businesses, and Impact Zone Businesses.

This memo outlines the process and recommendations concerning 69 applications for conditional licenses, 29 applications for conditional conversion licenses, and 5 applications for annual licenses that have been reviewed, scored, and are recommended for approval by the CRC Staff. The business type breakdown for each application type is as follows:

Conditionals: 69

Cultivator 12

Manufacturer 12

Retailer 45

Conversions: 29

Cultivator 8

Manufacturer 8

Retailer 13

Annuals: 5

Cultivator 2

Manufacturer 0

Retailer 3

Testing 0

The governing regulations at N.J.A.C. 17:30-6.1(d) provide that the Commission shall review, score, and approve conditional and annual cannabis business license applications and issue licenses to applicants that receive a full score or greater, and shall have the full authority to establish the priority by which conditional and



annual cannabis business license applications and applicants are reviewed, scored, approved, and issued, such that: 1. Social equity businesses, diversely owned businesses, and impact zone businesses always have priority over other license applicants; 2. Conditional license applicants always have priority over annual license applicants; 3. Microbusinesses license applicants always have priority over standard cannabis business license applicants; 4. License applicants given bonus points pursuant to N.J.S.A. 24:6I-36.d(2) have priority over license applicants with no bonus points; and 5. The priority of the review, scoring, and approval of license applications and issuance of licenses is consistent with meeting the market demands of the state, the Act and this chapter.

REVIEW PROCESS OVERVIEW

To review license applications, the CRC has developed an application review process that aligns with the authorizing statutes, the CRC's regulations, and the Notice of Application Acceptance. The process includes the following steps:

- 1. Priority Assignment Applications are assigned to their relevant priority level based on responses to questions on the application. This assignment occurs for all applicants after they submit their applications into the licensing system.
- 2. Priority Verification Once assigned a priority, the applications are then reviewed to ensure the applicant has submitted the proper documentation to support their priority assignment. If they have submitted the documentation, they remain in queue to be reviewed. This includes a review of any materials submitted to qualify as a Social Equity Business, a Diversely-Owned Business or an Impact Zone Business. If they have not submitted proof to back up their priority designation, the application is marked for rejection and curing.
- 3. Completeness Review Applications are reviewed for completeness to ensure everything required by the Notice is included in the application. If an application is deemed incomplete, it is marked for rejection and curing.
- 4. Scoring Applications that have been deemed complete are then scored in accordance with the rubric in the Notice. For conditional license applications, this includes an evaluation of their Business Plan and Management Profile, their Regulatory Compliance Plan, and their Plan to Obtain Liability Insurance. Conditional conversion and annual license applicants need to show they have municipal approval, site control, and have submitted all the required standard operating procedures and other application materials required by the Notice of Application Acceptance and CRC Regulations. Applications receive full points if they pass a measure, and no points if they fail. If an application fails in scoring, it is marked for rejection and curing.
- 5. Qualification, Limitations, Financial/Management Agreement Review Following scoring, applications that have passed all mandatory measures are then reviewed to ensure they are compliant with:
 - a. N.J.A.C. 17:30-6.8 (Limitations on license holders, owners, principals, pass investors, financial sources, management services contractors and vendor-contractors);
 - b. N.J.A.C. 17:30-6.9 (Management services agreements);
 - c. N.J.A.C. 17:30-6.10 (Financial source agreements); and



- d. N.J.A.C. 17:30-7.4 (Conditional license holder qualification).
- 6. Qualification Review License-applicants for conditional conversion and annual applications are then reviewed for Qualification pursuant to N.J.A.C. 17:30-7.11. To be approved, they also must be cleared by the CRC's Office of Compliance and Investigations and deemed qualified to hold a license. This includes a criminal history background check (N.J.A.C. 17:30-7.12) and probity review (N.J.A.C. 17:30-7.13).
- 7. Quality Control Any application that is deemed eligible for approval following a qualification review is then given a quality control review to ensure that the determination is accurate.
- 8. Recommendation to the CRC Board Applications that pass a quality control check are then recommended for approval to the board.

RECOMMENDATION AND JUSTIFICATION

It is recommended that the Conditional, Conversion, and Annual applications listed below be presented to the Board of Commissioners for the New Jersey Cannabis Regulatory Commission for award in the designated license class. The below-listed applicants have satisfied the terms of the Notice of Application Acceptance most-recently modified by the Board of Commissioners pursuant to Resolution 2023-72. Each of the below-listed applicants have earned the requisite full scores (or greater) to be awarded a license in their designated application type and license class.

Each of the below-listed applicants have been deemed compliant pursuant to the applicable regulations codified at N.J.A.C. 17:30-6 and 7. The rules also include the eligibility requirements and limitations for Social Equity Businesses, Diversely-Owned Businesses (DOB), and Impact Zone Businesses. A breakdown of those recommended awards follows in the next section.

PRIORITY BREAKDOWN

Conditionals: 69

Social Equity Business 13

Diversely Owned Businesses 41 (2DV, 1DV/M, 18M, 12MW, 8W)

Impact Zone Businesses 4

Conversions: 29

Social Equity Businesses 13

Diversely Owned Businesses 16 (5M, 4MW, 7W)

Annuals: 5

Diversely Owned Businesses 5 (2M, 1MW, 2W)

Note: Disabled Veteran-Owned ("DV"), Minority-Owned ("M"), Minority and Woman-Owned ("MW"), Woman-Owned ("W")



LIST

App ID	Applicant Business Name	Application Type	Priority	DOB Cert	Business Type	Business Category
2830	SNAILHOUSEUS LLC	Conditional	1A	N/A	Manufacturer	Micro
2951	BeStoned	Conditional	1A	N/A	Retailer	Micro
2903	Blazin Buddiez	Conditional	1A	N/A	Retailer	Micro
2822	Jersey Joints	Conditional	1A	N/A	Retailer	Micro
2921	Natures Bliss	Conditional	1A	N/A	Retailer	Micro
2834	The Vault	Conditional	1A	N/A	Retailer	Micro
2916	GENERATIONS OG LLC	Conditional	1B	N/A	Cultivator	Standard
2804	Head High Canna Company	Conditional	1B	N/A	Cultivator	Standard
2876	Topless Pre Rolls LLC	Conditional	1B	N/A	Manufacturer	Standard
2918	Klub CaniVibe LLC	Conditional	1B	N/A	Retailer	Standard
2963	Lady Bud Cannabis Dispensary LLC	Conditional	1B	N/A	Retailer	Standard
2777	Pigment Retail Company LLC	Conditional	1B	N/A	Retailer	Standard
2931	Urban Crops	Conditional	1B	N/A	Retailer	Standard
2818	IAMYCO Distributions LLC	Conditional	2A	MBE	Cultivator	Micro
2659	Bergen Bud Cannabis	Conditional	2A	WBE	Retailer	Micro
2936	Company Can XA Group LLC	Conditional	2A 2A	MBE	Retailer	Micro
2945	Flower Queen	Conditional	2A 2A	MWBE	Retailer	Micro
1915	High Buddy	Conditional	2A	MBE	Retailer	Micro
1484	High Street Industries	Conditional	2A 2A	WBE	Retailer	Micro
2863	High Timez LLC	Conditional	2A	MBE	Retailer	Micro
1687	Mary's Market	Conditional	2A	WBE	Retailer	Micro
1007	Pass To The Left	Conditional	2/1	VVDL	Retailer	IVIICIO
2756	Dispensary, LLC	Conditional	2A	MWBE	Retailer	Micro
2839	Spark 9 LLC	Conditional	2A	MBE	Retailer	Micro
2387	The Green Zone US LLC	Conditional	2A	MBE	Retailer	Micro
2965	Urban Goods LLC	Conditional	2A	MBE	Retailer	Micro
2900	Urth Company LLC	Conditional	2A	MBE	Retailer	Micro
2889	Verde Life LLC	Conditional	2A	MWBE	Retailer	Micro
1716	West Orange Farms	Conditional	2A	MWBE	Retailer	Micro
2760	A La Herb LLC	Conditional	2B	MWBE	Cultivator	Standard
2907	Gas Station 415 LLC	Conditional	2B	MBE	Cultivator	Standard
2799	Green Gruntz Growery	Conditional	2B	DVOB	Cultivator	Standard
2767	Green Liberty, LLC	Conditional	2B	WBE	Cultivator	Standard



App ID	Applicant Business Name	Application Type	Priority	DOB Cert	Business Type	Business Category
2761	NJ Pro Growers LLC	Conditional	2B	MWBE	Cultivator	Standard
2941	Pure Green Harvest LLC	Conditional	2B	MBE	Cultivator	Standard
2781	A La Herb LLC	Conditional	2B	MWBE	Manufacturer	Standard
2739	Flower & Flame LLC	Conditional	2B	MWBE	Manufacturer	Standard
2896	Gas Station 415 LLC	Conditional	2B	MBE	Manufacturer	Standard
2800	Green Gruntz Growery	Conditional	2B	DVOB	Manufacturer	Standard
1180	Illtown Growers LLC	Conditional	2B	WBE	Manufacturer	Standard
2928	North Lake Supply LLC	Conditional	2B	WBE	Manufacturer	Standard
2940	Pure Green Harvest LLC	Conditional	2B	MBE	Manufacturer	Standard
2871	The Lucky Leaf LLC	Conditional	2B	MBE	Manufacturer	Standard
2493	Atlantic Cannabis LLC	Conditional	2B	MWBE	Retailer	Standard
2807	Exotic Leaf LLC	Conditional	2B	MWBE	Retailer	Standard
2660	Fu Mei Farms Corporation	Conditional	2B	MWBE	Retailer	Standard
2906	Gas Station 415 LLC	Conditional	2B	MBE	Retailer	Standard
2883	Green Flora	Conditional	2B	MWBE	Retailer	Standard
2881	Green Mint Emporium	Conditional	2B	MBE	Retailer	Standard
2821	Joint Senses LLC	Conditional	2B	WBE	Retailer	Standard
2823	Living Well Botanicals	Conditional	2B	MBE	Retailer	Standard
2814	Medisin	Conditional	2B	MBE/ DVOB	Retailer	Standard
2014	Motherland Cannabis	Conditional	ZD	DVOB	Retailer	Stanuaru
2868	Company LLC	Conditional	2B	MBE	Retailer	Standard
	Paradise Cannabis					
2705	Dispensary LLC	Conditional	2B	MBE	Retailer	Standard
2803	The Dispensary Spot LLC	Conditional	2B	WBE	Retailer	Standard
2861	California Chronic	Conditional	3A	N/A	Retailer	Micro
2775	Pure Bliss Dispensary	Conditional	3A	N/A	Retailer	Micro
2448	Mule Extracts LLC	Conditional	3B	N/A	Cultivator	Standard
2554	Urban Leaf Dispensaries	Conditional	3B	N/A	Retailer	Standard
2789	Hedding Farm LLC	Conditional	4B	N/A	Cultivator	Standard
1761	Mr. Nice Guys AC, LLC	Conditional	4B	N/A	Retailer	Standard
2735	Lake of Leaves Inc	Conditional	5A	N/A	Retailer	Micro
1565	Remedy Oil	Conditional	5A	N/A	Retailer	Micro
2384	Shelly's Smoke Shop LLC	Conditional	5A	N/A	Retailer	Micro
2929	Market Wave LLC	Conditional	5B	N/A	Cultivator	Standard
2790	Hedding Farm LLC	Conditional	5B	N/A	Manufacturer	Standard
2966	Market Wave LLC	Conditional	5B	N/A	Manufacturer	Standard
2722	KGM Jersey Jane, LLC	Conditional	5B	N/A	Retailer	Standard
2905	Sugie's LLC	Conditional	5B	N/A	Retailer	Standard
	The Greenhouse					
2481	Dispensary LLC	Conditional	5B	N/A	Retailer	Standard



App ID	Applicant Business Name	Application Type	Priority	DOB Cert	Business Type	Business Category
2466	Prolific Growhouse	Conversion	1C	N/A	Cultivator	Micro
2354	GRC NJ LLC	Conversion	1C	N/A	Cultivator	Standard
	Premium Genetics					
2446	Partners LLC	Conversion	1C	N/A	Cultivator	Standard
2670	Lily Extracts	Conversion	1C	N/A	Manufacturer	Micro
2577	Canna P Farms	Conversion	1C	N/A	Manufacturer	Standard
2599	Herb-a-More LLC	Conversion	1C	N/A	Manufacturer	Standard
2602	Bakin' Bad LLC	Conversion	1C	N/A	Retailer	Micro
2564	Daylite Cannabis LLC	Conversion	1C	N/A	Retailer	Micro
2479	Jersey Leaf, LLC	Conversion	1C	N/A	Retailer	Micro
2424	Strictly CBD LLC	Conversion	1C	N/A	Retailer	Micro
2616	Treehouse Ventures	Conversion	1C	N/A	Retailer	Micro
2480	Canna Remedies LLC	Conversion	1C	N/A	Retailer	Standard
2533	Cottonmouth Dispensary LLC	Conversion	1C	N/A	Retailer	Standard
2364	Fu Mei Farms Corporation	Conversion	2C	WBE	Cultivator	Micro
2389	Power Grow, LLC	Conversion	2C	WBE	Cultivator	Micro
2303	Creative Flavors by Esther	CONVENSION	20	VVDL	Caltivator	IVIICIO
2436	LLC	Conversion	2C	WBE	Cultivator	Standard
2549	Grotech Farms, LLC	Conversion	2C	WBE	Cultivator	Standard
	Vidu Brothers Cannabis					
2394	Inc	Conversion	2C	MWBE	Cultivator	Standard
2351	Power Grow, LLC	Conversion	2C	WBE	Manufacturer	Micro
2397	Greater Purpose	Conversion	2C	MBE	Manufacturer	Standard
2512	Jersey Smooth, LLC	Conversion	2C	MBE	Manufacturer	Standard
2763	Sussex Cultivation LLC	Conversion	2C	WBE	Manufacturer	Standard
	Vidu Brothers Cannabis					
2393	Inc	Conversion	2C	MWBE	Manufacturer	Standard
	A21 Health & Wellness					
2437	LLC	Conversion	2C	MBE	Retailer	Micro
2534	Baked by the River	Conversion	2C	WBE	Retailer	Micro
2475	Garden Greenz	Conversion	2C	MBE	Retailer	Micro
2468	Noire Dispensary	Conversion	2C	MWBE	Retailer	Micro
2472	Decades Dispensary, LLC	Conversion	2C	MBE	Retailer	Standard
2474	The Jersey Joint, Inc.	Conversion	2C	MWBE	Retailer	Standard
1007	INSA II	Annual	7B	WBE	Cultivator	Standard
2001	Luxxe Green	Annual	7B	MWBE	Cultivator	Standard
2221	OTC Jersey	Annual	7B	MBE	Retailer	Standard
1681	Plant Base LLC	Annual	7B	MBE	Retailer	Standard
2427	Tambre, LLC	Annual	7B	WBE	Retailer	Standard



REVIEW AND QUALITY CONTROL CONFIRMATION

The licensing review and investigative process for each of these applications was completed, as required, in the Office of Licensing and the Office of Compliance and Investigations. Quality control review was completed by Counsel's Office on May 9, 2023.

Chief Counsel Christopher Riggs

RECOMMENDATION SUMMARY

Kelly Anderson-Thomas

The 69 conditional, 29 conversion, and 5 annual applications listed above have been deemed compliant with their priority designation, deemed complete, and scored for potential approval. They have also been reviewed for license-holder qualification provisions, for license-holder limitations, and any proposed financial source or management services agreements have received an initial review. At the time of proposed recommendation of approval, all businesses reviewed under the DOB status have an active certification in good standing. All recommended awards have been deemed qualified to hold a conditional or annual license following this review, probity and criminal history background check, if applicable.

CRC staff have determined that these license applications are eligible for approval by the CRC. Therefore, CRC staff recommend the CRC Board approve these applications for licenses.

Director of Licensing
Megan Tagliaferri

Approved by:

Deputy Executive Director



ATTACHMENT A

BACKGROUND AND OVERVIEW OF LICENSURE PROCESS

On August 19, 2021, the Commission adopted rules pursuant to P.L. 2021, C.16 which established the licensure process for cannabis businesses and testing laboratories. N.J.A.C. 17:30-7 outlines the application process and requirements for both conditional license applicants and annual license applicants.

The rules require the CRC to issue a Notice in the New Jersey Register that includes the application requirements for conditional and annual license applications. That Notice must include:

- Measures by which the license applicant will be scored;
- Maximum scores for each individual measure; and
- The total score required for a license applicant to be approved for a license.

On November 9, 2021, the CRC adopted a Notice in accordance with N.J.A.C. 17:30, Subchapters 6 and 7. That Notice was announced and approved at the CRC's November 9, 2021, public meeting, posted on the CRC's website, distributed to the CRC's email list, and was published in the New Jersey Register on December 6, 2021.

The Notice of Application Acceptance was updated twice to correct typos.

Pursuant to N.J.A.C. 17:30-6.1, in addition to the scoring measures and mandatory requirements for license applicants, the Notice also included a detailed list of application priority. Applications are reviewed in accordance 1) with the priority list included in the Notice and 2) in the order in time in which they are received.

The Notice can be found on the CRC's website.¹

In summary, the Notice of Application Acceptance:

- Prioritizes the review and scoring of Social Equity Business license applicants, which are businesses owned by individuals from Economically Disadvantaged Areas or who have past marijuana or hashish convictions, in both conditional and annual license categories;
- Prioritizes conditional license applicants over annual license applicants;

¹ New Jersey Cannabis Regulatory Commission – Notice of Application Acceptance for Personal-Use Cannabis Licenses. https://www.nj.gov/cannabis/documents/businesses/personal-use/Final%20Notice%20of%20Application%20Acceptance.pdf



- Provides that microbusiness applicants are given priority in every category of license application; and
- Establishes pass/fail scoring criteria that comply with the statute and rules by which applications will be reviewed.

To allow the market to develop without arbitrary restrictions on growth, the Notice established no caps on the number of licenses available statewide, except where provided by law, and no geographic restrictions on the availability of licenses.

APPLICATION AND BUSINESS CATEGORY OVERVIEW

N.J.S.A. 24:6I-33 and N.J.A.C. 17:30 establish several categories of cannabis business types and license applications that may be submitted and considered by the CRC.

First, applications can either be for conditional or annual licensure.

Second, a cannabis business can either be a standard sized business or a microbusiness. A microbusiness is limited to 2,500 square feet and ten employees.

Finally, license applicants may qualify as a Social Equity Business, a Diversely-Owned Business, or an Impact Zone business.

Conditional Licenses

Conditional licenses are temporary licenses that will be required to submit organizational and personal information to ensure they are compliant with the law, attest they will comply with a criminal background check, and provide a business plan and regulatory compliance plan. At the time of application, all owners with decision-making authority of the conditional license applicant will need to prove that they made less than \$200,000 in the preceding tax year, or \$400,000 if filing jointly.

If approved and issued a conditional license, a conditional license holder will then be required to have a permanent site for their business, gain control of the property through lease or purchase, gain municipal approval, and submit a conditional conversion application that includes standard operating procedures for the business, an environmental impact plan, a workforce development plan, and a security plan.

Importantly, conditional license holders are NOT authorized to cultivate, manufacture, sell or otherwise possess cannabis or cannabis items. Conditional license holders ARE authorized to move forward in the application process and submit a conditional conversion application to convert to a full annual license through an abbreviated application process.



Annual Licenses

Annual licenses are licenses that, once issued, authorize a license-holder to conduct the full range of activities allowed under the relevant statutes and rules. Applicants for annual licenses are required to submit a more detailed application that includes details for the proposed site for the business, which must be owned or leased, municipal approval, zoning approval, and an operating summary plan in which applicants detail their experience, history, and knowledge of critical pieces of operating a cannabis business.

Social Equity Businesses

Social Equity Businesses are a newly created type of business that is based on either economic need or having a criminal record that includes past marijuana-related offenses. Social Equity Businesses are either:

- 1. Owned by individuals who have lived in an Economically Disadvantaged Area, as defined by a zip code that has 80% or less of the average median household income in the state and has a health uninsured rate that is at least 150% of the health uninsured rate in the State.
- 2. Owned by individuals with previous marijuana-related convictions.

The list of Economically Disadvantaged Areas can be found on the CRC's website.²

Diversely-Owned Businesses

Diversely-Owned Businesses is an umbrella term used to describe businesses that are certified by the New Jersey Department of the Treasury as a minority-owned business, a woman-owned business, a disabled veteran-owned business, or any combination of the three.

Impact Zone Businesses

Impact Zone Businesses are businesses that are owned by individuals who have lived in an Impact Zone, are located within an Impact Zone, or plan to offer employment opportunities to residents of Impact Zones.

² New Jersey Cannabis Regulatory Commission – Identifying Economically Disadvantaged Areas. https://www.nj.gov/cannabis/documents/businesses/priority-applications/Identifying%20Economically%20Disadvantaged%20Areas_FINAL.pdf



A list of Impact Zones can be found on the CRC's website.³

PRIORITY REVIEW OVERVIEW

The CRC's rules for personal-use cannabis establish a licensure process under which applications are reviewed on a rolling basis and sorted in accordance with the priority outlined in the rules and detailed in the Notice of Application Acceptance.

The current priority designation, which was followed for application reviews included in the is recommendation, is:

- 1. Social Equity Businesses, ordered by first in time, that:
 - a. Have submitted a conditional license application for a microbusiness;
 - b. Have submitted a conditional license application for a standard business;
 - c. Have submitted a conditional license conversion application;
- 2. Diversely Owned businesses, ordered by first in time, that:
 - a. Have submitted a conditional license application for a microbusiness;
 - b. Have submitted a conditional license application for a standard business;
 - c. Have submitted a conditional license conversion application;
- 3. Impact Zone Businesses, ordered by first in time, that:
 - a. Have submitted a conditional license application for a microbusiness;
 - b. Have submitted a conditional license application for a standard business;
 - c. Have submitted a conditional license conversion application;
- 4. License applicants receiving bonus points pursuant to N.J.S.A. 24:6I-36.d(2) and the Notice, ordered by first in time, that:
 - a. Have submitted a conditional license application for a microbusiness;
 - b. Have submitted a conditional license application for a standard business;
 - c. Have submitted a conditional license conversion application;
- 5. All other applicants for conditional licenses, ordered by first in time, that:
 - a. Have submitted a conditional license application for a microbusiness;
 - b. Have submitted a conditional license application for a standard business;
 - c. Have submitted a conditional license conversion application;
- 6. Social Equity Businesses, ordered by first in time, that:
 - a. Have submitted an annual license application for a microbusiness;
 - b. Have submitted an annual license application for a standard business;
- 7. Diversely-Owned businesses, ordered by first in time, that:
 - a. Have submitted an annual license application for a microbusiness;

³ New Jersey Cannabis Regulatory Commission – Identifying Economically Disadvantaged Areas. https://www.nj.gov/cannabis/documents/businesses/priority-applications/Impact%20Zones%20abstract%20.pdf.



- b. Have submitted an annual license application for a standard business;
- 8. Impact Zone Businesses, ordered by first in time, that:
 - a. Have submitted an annual license application for a microbusiness;
 - b. Have submitted an annual license application for a standard business;
- 9. License applicants receiving bonus points pursuant to N.J.S.A. 24:6I-36.d(2) and the Notice, ordered by first in time, that:
 - a. Have submitted an annual license application for a microbusiness;
 - b. Have submitted an annual license application for a standard business; and
- 10. All other applicants for annual licenses, ordered by first in time, that:
 - a. Have submitted an annual license application for a microbusiness;
 - b. Have submitted an annual license application for a standard business.

Under this system of application review, license applications are ordered first by their priority designation. For example, a conditional application for a microbusiness that qualifies as a Social Equity Business receives highest overall priority. Secondly, license applications are ordered by the time at which they submit. This means that when a conditional application for a microbusiness that qualifies as a Social Equity Business submits, they don't get ordered at the end of the overall line – they get ordered at the end of the line for priority group "1A".

All license applications get reviewed, scored, and either approved, rejected, or denied – but some are done before others in accordance with this priority.

There are two points in the process when priority is assessed: 1) when the application is submitted and begins the review and scoring process; and 2) when the application review is complete, and it is deemed eligible for approval.

Between those two points, some applications may take longer to review so some lower priority applications may be deemed eligible for approval before higher priority applications, even though they began the process before the lower priority applications. But once a group of applications is deemed eligible for approval, overall priority is once again assessed, and approvals are done in accordance with that priority.