



Memorandum

Date: April 15, 2020

To: Licensed Pharmacists
Licensed Pharmacies

From: Dawn B. Crim, Secretary-designee

RE: Two Additional Pharmacy Examining Board Orders

The Pharmacy Examining Board has issued two additional variances which modify statute or administrative code requirements in response to the COVID-19 public health emergency. One variance pertains to the manufacturing of personal protective equipment (PPE) and the other addresses consulting and delivery requirements.

To mirror similar actions taken by the federal government, the Pharmacy Examining Board granted a variance to modify Wis. Stat. § 450.07(1) and Wis. Admin. Code § Phar 12.03(1). The variance allows a manufacturer to temporarily manufacture needed PPE without a license during a period of declared emergency. Please see [order](#) for details.

The variance applies to all persons seeking to manufacture PPE on a temporary basis in the state of Wisconsin. It is valid for 90 days from the April 15, 2020 issuance unless modified or extended.

The Pharmacy Examining Board also issued a variance to Wis. Admin. Code § Phar 7.01(1)(e) and (em) to temporarily relax the consulting and delivery requirements when delivering medications or devices to a patient. This variance allows flexibility to help compensate for workforce and PPE shortages during the COVID-19 emergency. Pharmacists will be able to use their professional judgement to determine if a consultation is required and how it is provided. Also, transfer of a prescription to a patient or agent may take place at any location appropriate under the circumstances and agreeable to the patient. Transfer may be done by an appropriate delegate. Please see [order](#) for details.

The variance applies to all persons legally permitted to practice pharmacy in the state of Wisconsin. It shall remain valid for 90 days from the April 15, 2020 issuance unless modified or extended.