



**VIRTUAL/TELECONFERENCE
REFERRAL CRITERIA WORK GROUP
CONTROLLED SUBSTANCES BOARD**
Virtual, 4822 Madison Yards Way, Madison
Contact: Tom Ryan (608) 266-2112
May 8, 2026

*The following agenda describes the issues that the Work Group plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a description of the actions and deliberations of the Work Group.
A quorum of the Board may be present during the Work Group meeting.*

AGENDA

8:30 A.M.

OPEN SESSION - CALL TO ORDER – ROLL CALL

- A. Adoption of Agenda (1)**
- B. Approval of Minutes for March 8, 2024 (2-4)**
- C. Top Opioid Prescribing Audit Procedure – Review and Consideration (5-11)**
- D. Public Comments**

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

- E. Vote on Items Considered or Deliberated Upon in Closed Session if Voting is Appropriate**

ADJOURNMENT

NEXT MEETING: JULY 10, 2026

MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE. Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held virtually unless otherwise indicated. In-person meetings are typically conducted at 4822 Madison Yards Way, Madison, Wisconsin, unless an alternative location is listed on the meeting notice. In order to confirm a meeting or to request a complete copy of the board's agenda, please visit the Department website at <https://dsps.wi.gov>. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of any agenda item may be changed by the board for the convenience of the parties. The person credentialed by the board has the right to demand that the meeting at which final action may be taken against the credential be held in open session. Requests for interpreters for the hard of hearing, or other accommodations, are considered upon request by contacting the Affirmative Action Officer or reach the Meeting Staff by calling 608-267-7213.

**VIRTUAL/TELECONFERENCE
REFERRAL CRITERIA WORKGROUP
CONTROLLED SUBSTANCES BOARD
MEETING MINUTES
MARCH 8, 2024**

PRESENT: Subhadeep Barman, Doug Englebert, Amanda Kane (*arrived at 8:33 a.m.*), John Weitekamp

STAFF: Tom Ryan, Executive Director; Whitney DeVoe, Legal Counsel; Dialah Azam, Board Administration Specialist; and other DSPS Staff

CALL TO ORDER

Doug Englebert, Chairperson, called the meeting to order at 8:30 a.m. A quorum was confirmed with three (3) members present.

ADOPTION OF AGENDA

Amendments to the Agenda:

- **CHANGE** Adoption of Minutes from January 19, 2024 to December 15, 2023

MOTION: Subhadeep Barman moved, seconded by John Weitekamp, to adopt the Agenda as amended. Motion carried unanimously.

ADOPTION OF MINUTES OF DECEMBER 15, 2023

MOTION: John Weitekamp moved, seconded by Subhadeep Barman, to adopt the Minutes of December 15, 2023 as published. Motion carried unanimously.

(*Amanda Kane arrived at 8:33 a.m.*)

CONVENE TO CLOSED SESSION

MOTION: Subhadeep Barman moved, seconded by John Weitekamp, to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.). Doug Englebert, Chairperson, read aloud the language of the motion. The vote of each member was ascertained by voice vote. Roll Call Vote: Subhadeep Barman-yes; Doug Englebert-yes; Amanda Kane-yes and John Weitekamp-yes. Motion carried unanimously.

The Board convened to Closed Session at 8:34 a.m.

**REVIEW OF SUMMARY REPORTS POTENTIALLY IDENTIFYING SUSPICIOUS OR
CRITICALLY DANGEROUS CONDUCT OR PRACTICES**

- MOTION:** John Weitekamp moved, seconded by Amanda Kane, to refer Prescriber MEB # 16 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by John Weitekamp, to refer Prescriber MEB # 19 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Doug Englebert moved, seconded by Subhadeep Barman, to refer Prescriber MEB # 36 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by Doug Englebert, to refer Prescriber MEB # 37 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Doug Englebert moved, seconded by Subhadeep Barman, to refer Prescriber MEB # 39 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by Amanda Kane, to refer Prescriber MEB # 41 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by John Weitekamp, to refer Prescriber MEB # 43 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by Doug Englebert, to refer Prescriber MEB # 44 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Doug Englebert moved, seconded by Subhadeep Barman, to refer Prescriber PA # 2 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by Amanda Kane, to refer Prescriber PA # 8 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Doug Englebert moved, seconded by John Weitekamp, to refer Prescriber PA # 9 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.
- MOTION:** Subhadeep Barman moved, seconded by Amanda Kane, to refer Prescriber BON # 16 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.

MOTION: Doug Englebert moved, seconded by John Weitekamp, to refer Prescriber DEB # 6 to the Controlled Substances Board for recommendation of further action. Motion carried unanimously.

RECONVENE TO OPEN SESSION

MOTION: John Weitekamp moved, seconded by Subhadeep Barman, to reconvene into Open Session. Motion carried unanimously.

The Board reconvened into Open Session at 9:23 a.m.

VOTING ON ITEMS CONSIDERED OR DELIBERATED ON IN CLOSED SESSION

MOTION: Subhadeep Barman moved, seconded by John Weitekamp, to affirm all motions made and votes taken in Closed Session. Motion carried unanimously.

(Be advised that any recusals or abstentions reflected in the Closed Session motions stand for the purposes of the affirmation vote.)

ADJOURNMENT

MOTION: John Weitekamp moved, seconded by Subhadeep Barman, to adjourn the meeting. Motion carried unanimously.

The meeting adjourned at 9:23 a.m.

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Marjorie Liu Program Lead, PDMP		2) Date when request submitted: 04/28/2026 <small>Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting</small>	
3) Name of Board, Committee, Council, Sections: Controlled Substances Board Referral Criteria Workgroup			
4) Meeting Date: 05/08/2026	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Review of Top Opioid Prescribing Audit Procedure	
7) Place Item in: <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	8) Is an appearance before the Board being scheduled? <i>(If yes, please complete Appearance Request for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if required:	
10) Describe the issue and action that should be addressed: <ul style="list-style-type: none"> Review of the Proposed Procedure and Additional Criteria/Thresholds for Top Opioid Prescribing Audits Implementation Considerations 			
11)	<i>Marjorie Liu</i>	Authorization	4/28/2026
Signature of person making this request		Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda)		Date	
Directions for including supporting documents: <ol style="list-style-type: none"> 1. This form should be attached to any documents submitted to the agenda. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting. 			

CSB Top Opioid Prescribers Audit – 2026

Modified Timeline & Procedure

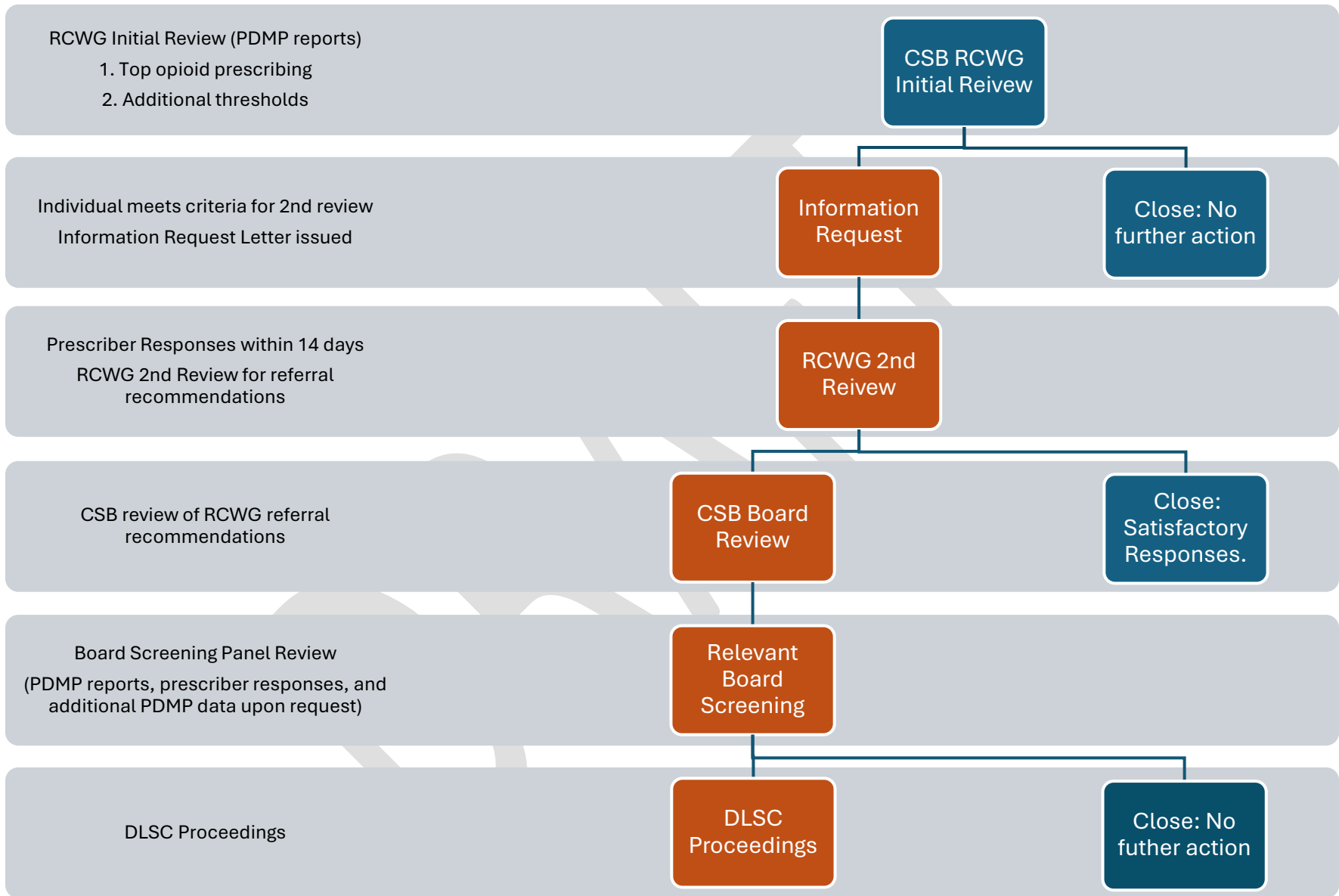
Timeline	Activity
April 23 th	PDMP monthly release of NPI data pull fixes Q1 data available for mock audit with proposed changes*
May 8 th	CSB Referral Criteria Workgroup (RCWG) reconvenes to review proposed changes to procedures and thresholds
Bi-Monthly Meetings Thereafter as needed	Subsequential reports ready for review based on quarterly data

* ePDMP usage not completely capturing EHR queries.

The following updated procedure is based on the workflow prior to the temporary pause with two additional steps inserted including

1. RCWG 2nd review of prescribers’ responses to the Information Request Letter prior to CSB full board consideration, and
2. Relevant Board Screening Panel review prior to the DLSC complaint procedure.

If the proposed additional thresholds (see page 4) are approved by the CSB, it is recommended that the RCWG initial review comes *after* the Information Request Letter is issued to reduce redundant reviewing. In other words, the RCWG will review both PDMP reports & responses at the initial review before making referral recommendation for the full CSB’s consideration.



Additional Data Points & Thresholds for Consideration

All the proposed criteria and thresholds can be generated from the same data analytics that have been included in the top prescribing reports.

- Current Threshold – Top 99.5th percentile opioid prescribing by professions including MD/DO, PA, APNP (APRN- Prescriber), and Dentists. (To lower the threshold might result in the automation to time out.)
- Additional Criteria for Consideration:

Data Point	Note	Existing Data Source
ePDMP Usage \leq 75%	ePDMP usage equal to or lower than 75% has been a general measure of insufficient usage when the workgroup makes referral recommendations for top opioid prescribing practitioners.	Prescriber Query Compliance report
# of Concurrent Benzo and Opioid alerts \geq 100	Large numbers of the two data-driven alerts have been used by the workgroup as an indicator of suspicious or critically dangerous practices.	Data-Driven Alerts by Prescriber report
# of High MME alerts \geq 100		

Results of Mock Audit: Based on Q3 2025 Data for MEB (MD/DO)

Thresholds	Number of Practitioners	Number of Practitioners have ≥ 100 of both alerts	Number of Practitioners have ≥ 100 of both alerts AND Usage $\leq 75\%$	Number of Practitioners Meets all the four thresholds
99.5 th percentile in opioid prescribing	41			7
ePDMP Usage $\leq 75\%$	2,675			
# of Concurrent Benzo and Opioid alerts ≥ 100	65	30	24	
# of High MME alerts ≥ 100	42			



Date

Name

Title

Address

City State ZIP

RE: Information Request

Dear [Name]:

The Wisconsin Controlled Substances Board (CSB) is authorized under Wis. Stat. §§ [961.385\(2\)\(cm\)3.c.](#) and [961.385\(2\)\(f\)](#) to identify practitioners who may be prescribing outside the currently accepted standards of practice for their profession. The CSB conducts quarterly audits of prescribing practices by reviewing various data points in the Wisconsin Prescription Drug Monitoring Program (PDMP) such as the PDMP usage, dispensing data of monitored drugs, and data-driven alerts of concerning patient history. During the reviewing period of «StartDateYear» to «EndDateYear», PDMP data indicates that you:

- Prescribed «Criteria & Reasons for Referral»,
- Recorded a PDMP usage rate of «%», and/or
- (additional thresholds)

This data suggests some of your prescribing practices may be outside of the recommendations provided by the [Wisconsin Medical Examining Board Opioid Prescribing Guidelines].

The CSB is requesting additional information as there may be clinical circumstances warranting prescribing practices that cannot be determined from the data available to us. Please note, that PDMP relies on records reported by dispensing pharmacies and so discrepancies may occur. .

To help us better understand your practice and support safe patient care, please respond within **14 days** with the following:

1. Verify your PDMP profile

Log in to the PDMP and review:

- a. Prescribing Practice Metrics
- b. Patient Panel
- c. PDMP Usage
- d. In addition, confirm your profile details – including your specialty – and note any corrections.

2. Provide clinical context

Share the clinical rationale or any factors that may explain your prescribing records for [CriteriaThresholds and/or Usage Rate].

3. Risk mitigation strategies

Outline the steps you take to safeguard patients and reduce potential risks when prescribing controlled substances.

4. Use of the PDMP

Describe how you and your delegates integrate the PDMP into your practice workflow to promote safe and informed care.

Please provide the Board with the requested information within 14 days of receiving this letter by emailing PDMP@wisconsin.gov. Questions regarding this letter may also be emailed to DSPSBoardCounsel@wisconsin.gov. Thank you for your attention to this matter.

Sincerely,

[Insert signature]

Member of the Controlled Substances Board

Date