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**VIRTUAL/TELECONFERENCE  
PHARMACY EXAMINING BOARD**  
**Virtual, 4822 Madison Yards Way, Madison**  
**Contact: Brad Wojciechowski (608) 266-2112**  
**October 16, 2025**

*The following agenda describes the issues that the Board 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 of the Board.*

**AGENDA**

**11:00 A.M.**

**OPEN SESSION – CALL TO ORDER – ROLL CALL**

- A. Adoption of Agenda (1-4)**
- B. Approval of Minutes of August 21, 2025 (5-11)**
- C. Reminders: Conflicts of Interest, Scheduling Concerns
- D. Introductions, Announcements and Recognition**
  - 1. Recognition: Michael Walsh, Public Member (Resigns: 10/16/2025)
- E. Administrative Matters – Discussion and Consideration**
  - 1. Department, Staff and Board Updates
  - 2. Election of Officers, Appointments of Liaisons and Alternates, Delegation of Authorities**
  - 3. Board Members – Term Expiration Dates
    - a. O’Hagan, Tiffany M. – 7/1/2028
    - b. Peterangelo, Anthony – 7/1/2027
    - c. Sokn, Erick – 7/1/2029
    - d. Walsh, Michael – 7/1/2024
    - e. Weitekamp, John G. – 7/1/2026
    - f. Wilson, Christa – 7/1/2029
- F. Legislative and Policy Matters – Discussion and Consideration
- G. Administrative Rule Matters – Discussion and Consideration (12-20)**
  - 1. Emergency Rule Draft: Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions **(13-17)**
  - 2. Scope Statement: Phar 1 and 7, Relating to Patient Drug Information Monographs **(18-19)**
  - 3. Pending or Possible Rulemaking Projects **(20)**

- H. Speaking Engagements, Travel, or Public Relation Requests, and Reports – Discussion and Consideration (21)**
  - 1. Travel Report: 2025 District IV NABP/AACP Meeting – September 10-12, 2025 – Fort Wayne, IN – O’Hagan, Wojciechowski
  - 2. Travel Report: MPJE State-Specific Review – September 17-19, 2025 – Mt. Prospect, IL – O’Hagan, Weitekamp
- I. Interdisciplinary Advisory Committee – Discussion and Consideration
- J. National Association of Boards of Pharmacy Matters – Discussion and Consideration
- K. NABP Pulse Regulator Monthly Champions Call – Discussion and Consideration
- L. Newsletter Matters – Discussion and Consideration (22)**
- M. Credentialing Matters – Discussion and Consideration
- N. Liaison Reports – Discussion and Consideration
- O. Discussion and Consideration on Items Added After Preparation of Agenda
  - 1. Introductions, Announcements and Recognition
  - 2. Nominations, Elections, and Appointments
  - 3. Administrative Matters
  - 4. Election of Officers
  - 5. Appointment of Liaisons and Alternates
  - 6. Delegation of Authorities
  - 7. Education and Examination Matters
  - 8. Credentialing Matters
  - 9. Practice Matters
  - 10. Legislative and Policy Matters
  - 11. Administrative Rule Matters
  - 12. Public Health Emergencies
  - 13. Pilot Program Matters
  - 14. Variances
  - 15. Liaison Reports
  - 16. Board Liaison Training and Appointment of Mentors
  - 17. Informational Items
  - 18. Division of Legal Services and Compliance (DLSC) Matters
  - 19. Presentations of Petitions for Summary Suspension
  - 20. Petitions for Designation of Hearing Examiner
  - 21. Presentation of Stipulations, Final Decisions and Orders
  - 22. Presentation of Proposed Final Decisions and Orders
  - 23. Presentation of Interim Orders
  - 24. Pilot Program Matters
  - 25. Petitions for Re-Hearing
  - 26. Petitions for Assessments
  - 27. Petitions to Vacate Orders
  - 28. Requests for Disciplinary Proceeding Presentations
  - 29. Motions
  - 30. Petitions
  - 31. Appearances from Requests Received or Renewed
  - 32. Speaking Engagements, Travel, or Public Relation Requests, and Reports

**P. 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 closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, 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.).**

**Q. Credentialing Matters**

**1. Application Review**

- a. A.H.D. – Pharmacy Technician (IA-577820) **(23-55)**
- b. A.P. – Pharmacy (Out-of-State) (IA-652819) **(56-185)**
- c. B.V.S. – Pharmacy (Out-of-State) (IA-672331) **(186-197)**
- d. V.I. – Third Party Logistics Provider (Out-of-State) **(198-232)**
- e. W.S.P. – Pharmacy (Out-of-State) (IA-642122) **(233-389)**

**2. Inspection Report Review**

- a. P. – Pharmacy (Out-of-State) (IA-582662) **(390-421)**

**R. Deliberation on Division of Legal Services and Compliance Matters**

**1. Administrative Warnings**

- a. 25 PHM 0081 – A.R. **(422-423)**

**2. Case Closings**

- a. 24 PHM 016 – M.D.C. **(424-428)**
- b. 24 PHM 0104 – W. **(429-435)**
- c. 24 PHM 0139 – T.P. **(436-440)**
- d. 24 PHM 0174 – C.N.A. **(441-448)**
- e. 25 PHM 0034 – O.M.D. **(449-451)**
- f. 25 PHM 0051 – C.P. **(452-456)**
- g. 25 PHM 0065 – E.S.P. **(457-461)**

**3. Proposed Stipulations, Final Decisions and Orders**

- a. 25 PHM 0083 – Anazao Health Corporation **(462-467)**

**4. Petition for Authorization to Request Extension of Time**

- a. 24 PHM 0163 – R.S.H.M. **(468-474)**

**S. Deliberation of Items Added After Preparation of the Agenda**

- 1. Education and Examination Matters
- 2. Credentialing Matters
- 3. Application Reviews
- 4. DLSC Matters
- 5. Monitoring Matters
- 6. Professional Assistance Procedure (PAP) Matters
- 7. Petitions for Summary Suspensions
- 8. Petitions for Designation of Hearing Examiner
- 9. Proposed Stipulations, Final Decisions and Orders
- 10. Proposed Interim Orders
- 11. Administrative Warnings
- 12. Review of Administrative Warnings
- 13. Proposed Final Decisions and Orders
- 14. Matters Relating to Costs/Orders Fixing Costs
- 15. Case Closings
- 16. Board Liaison Training
- 17. Petitions for Assessments and Evaluations

18. Petitions to Vacate Orders
19. Remedial Education Cases
20. Motions
21. Petitions for Re-Hearing
22. Appearances from Requests Received or Renewed

T. Consulting with Legal Counsel

**RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION**

U. Vote on Items Considered or Deliberated Upon in Closed Session if Voting is Appropriate

V. Open Session Items Noticed Above Not Completed in the Initial Open Session

**ADJOURNMENT**

**NEXT MEETING: DECEMBER 18, 2025**

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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  
PHARMACY EXAMINING BOARD  
MEETING MINUTES  
AUGUST 21, 2025**

**PRESENT:** Tiffany O'Hagan, Anthony Peterangelo, Erick Sokn, John Weitekamp, Christa Wilson

**ABSENT:** Michael Walsh

**STAFF:** Brad Wojciechowski, Executive Director; Whitney DeVoe, Legal Counsel; Nilajah Hardin, Administrative Rules Coordinator; Tracy Drinkwater, Board Administrative Specialist; and other Department staff

**CALL TO ORDER**

John Weitekamp, Chairperson, called the meeting to order at 11:00 a.m. A quorum was confirmed with five (5) members present.

**ADOPTION OF AGENDA**

**MOTION:** Christa Wilson moved, seconded by Tiffany O'Hagan, to adopt the Agenda as published. Motion carried unanimously.

**APPROVAL OF MINUTES OF JUNE 19, 2025**

**MOTION:** Christa Wilson moved, seconded by Anthony Peterangelo, to approve the Minutes of June 19, 2025, as published. Motion carried unanimously.

**Recognition: Susan M. Kleppin, Pharmacist Member (Resigned: 8/7/2025)**

**MOTION:** John Weitekamp moved, seconded by Tiffany O'Hagan, to recognize and thank Susan Kleppin for their years of dedicated service to the Board and State of Wisconsin. Motion carried unanimously.

**ADMINISTRATIVE MATTERS**

**Appointments of Liaisons and Alternates**

LIAISON APPOINTMENTS	
Credentialing Liaison(s)	Anthony Peterangelo, Tiffany O'Hagan, Christa Wilson
Education and Examinations Liaison(s)	Erick Sokn <i>Alternate:</i> John Weitekamp
Monitoring Liaison(s)	Michael Walsh, Christa Wilson

	<i>Alternate: Anthony Peterangelo</i>
<b>Professional Assistance Procedure (PAP) Liaison(s)</b>	Anthony Peterangelo <i>Alternate: Erick Sokn</i>
<b>Travel Authorization Liaison(s)</b>	John Weitekamp <i>Alternate: Tiffany O'Hagan</i>
<b>Legislative Liaison(s)</b>	Anthony Peterangelo, Tiffany O'Hagan, John Weitekamp
<b>Pilot Program Liaison(s)</b>	Tiffany O'Hagan, Anthony Peterangelo
<b>Newsletter Liaison(s)</b>	Christa Wilson <i>Alternate: John Weitekamp</i>
<b>Website Liaison(s)</b>	Michael Walsh
<b>Appointed to Controlled Substances Board as per Wis. Stats. §15.405(5g)</b>	John Weitekamp
<b>PHARM Rep to SCAODA</b>	Erick Sokn <i>Alternate: John Weitekamp</i>
<b>Variance Liaison(s)</b>	Tiffany O'Hagan <i>Alternate: Anthony Peterangelo</i>
<b>Inspection Liaison(s)</b>	Erick Sokn <i>Alternate: Tiffany O'Hagan</i>
<b>SCREENING PANEL APPOINTMENTS</b>	
<b>Screening Panel</b>	John Weitekamp, Tiffany O'Hagan, Michael Walsh <i>Alternate: Anthony Peterangelo</i>
<b>COMMITTEE MEMBER APPOINTMENTS</b>	
Pharmacy Rules Committee	Erick Sokn, Tiffany O'Hagan, Anthony Peterangelo, John Weitekamp
<b>OTHER APPOINTMENTS</b>	
<b>Interdisciplinary Advisory Council</b>	John Weitekamp <i>Alternate: Christa Wilson</i>

## **ADMINISTRATIVE RULE MATTERS**

### **Preliminary Rule Draft: Phar 7, Relating to Electronic Prescriptions, Prescription Labeling, CPR for Pharmacists, Epinephrine Delivery Systems, Controlled Substance Prescription Transfers, Remote Dispensing, Managing Pharmacist Definition, Initial Consultation, Alteration, and Final Check**

**MOTION:** Anthony Peterangelo moved, seconded by Erick Sokn, to approve the preliminary rule draft of Phar 7, Relating to Electronic Prescriptions, Prescription Labeling, CPR for Pharmacists, Epinephrine Delivery Systems, Controlled Substance Prescription Transfers, Remote Dispensing, Managing Pharmacist Definition, Initial Consultation, Alteration, and Final Check, for posting for economic impact comments and submission to the Clearinghouse. Motion carried unanimously.

### **Possible Rule Project: Paper-Free Prescription Information**

**MOTION:** Erick Sokn moved, seconded by Anthony Peterangelo, to request DSPS staff draft a Scope Statement revising Phar 1 and 7, relating to Patient Drug Information Monographs. Motion carried unanimously.

## **SPEAKING ENGAGEMENTS, TRAVEL, OR PUBLIC RELATION REQUESTS, AND REPORTS**

### **Travel Request: NABP Forum: Executive Officer, Board Member, Compliance Officer, and Legal Counsel – October 27, 2025 – Mt. Prospect, IL**

**MOTION:** Tiffany O'Hagan moved, seconded by Christa Wilson, to designate Whitney DeVoe, Brad Wojciechowski and a Board Member, to attend the NABP Forum: Executive Officer, Board Member, Compliance Officer, and Legal Counsel, October 27, 2025, Mt. Prospect, IL. Motion carried unanimously.

## **INTERDISCIPLINARY ADVISORY COMMITTEE**

### **IV Hydration Guidance Document**

**MOTION:** Anthony Peterangelo moved, seconded by Erick Sokn, to delegate IAC Liaison the authority to approve the IV Hydration guidance on behalf of the Board. Motion carried unanimously.

**MOTION:** Erick Sokn moved, seconded by Christa Wilson, to refer comments on the IV Hydration Guidance Document to the IAC. Motion carried unanimously.

## CLOSED SESSION

**MOTION:** Christa Wilson moved, seconded by Anthony Peterangelo, to 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 closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, 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.). John Weitekamp, Chairperson, read the language of the motion. The vote of each member was ascertained by voice vote. Roll Call Vote: Tiffany O'Hagan-yes; Erick Sokn-yes; Anthony Peterangelo-yes; John Weitekamp-yes; and Christa Wilson-yes. Motion carried unanimously.

The Board convened into Closed Session at 12:29 p.m.

## PETITION FOR SUMMARY SUSPENSION

### **12:30 P.M. APPEARANCE: John Lightfield, DLSC Attorney; and A.P.B., Respondent: 24 PHM 0117 – A.P.B.**

**MOTION:** Erick Sokn moved, seconded by Anthony Peterangelo, to acknowledge that oral arguments in the Summary Suspension proceedings for DLSC Case Number 24 PHM 0117 were presented to the Board by John Lightfield, DLSC Attorney. Respondent did not appear. Motion carried unanimously.

**MOTION:** Christa Wilson moved, seconded by Erick Sokn, to find that notice was given to A.P.B., DLSC Case Number 24 PHM 0117, of the Summary Suspension proceedings pursuant to Wis. Admin. Code § SPS 6.05. Motion carried unanimously.

**MOTION:** Erick Sokn moved, seconded by Anthony Peterangelo, to delegate authority to CLC to act on behalf of the Board to determine if there is probable cause to believe that A.P.B., Respondent, has engaged in or is likely to engage in conduct such that the public health, safety or welfare imperatively requires emergency suspension of the Respondent's registration and to issue the Order for Summary Suspension in the matter of disciplinary proceedings against Respondent, DLSC Case Number 24 PHM 0117, pursuant to Wis. Admin. Code § SPS 6.06. Motion carried unanimously.

*(John Weitekamp recused and left the room for deliberation and voting in the matter concerning A.P.B., DLSC Case Number 24 PHM 0117)*



## CREDENTIALING MATTERS

### Application Review

#### *J.A.F. – Pharmacy Technician (IA-81318)*

**MOTION:** Tiffany O'Hagan moved, seconded by John Weitekamp, to authorize Board Counsel to request additional information from Applicant IA-81318. Once the additional information is received the Liaison may act on the application. Motion carried unanimously.

#### *S.P. – Pharmacy (Out-of-State) (IA-509288)*

**MOTION:** John Weitekamp moved, seconded by Anthony Peterangelo, to authorize Board Counsel to request additional information from Applicant IA-509288. Once the additional information is received the Liaison may act on the application. Motion carried unanimously.

#### *M.M.S. – Wholesale Distributor (IA-633141)*

**MOTION:** Tiffany O'Hagan moved, seconded by John Weitekamp, to authorize Board Counsel to send a three-option letter for application IA-633141 for Wholesale Distributor credential. Motion carried unanimously.

## DELIBERATION ON DIVISION OF LEGAL SERVICES AND COMPLIANCE (DLSC) MATTERS

### Administrative Warnings

**MOTION:** Christa Wilson moved, seconded by Anthony Peterangelo, to issue an Administrative Warning in the following DLSC Cases:

1. 23 PHM 141 – B.H.R.
2. 24 PHM 0103 – H.P.
3. 24 PHM 0103 – S.H.
4. 24 PHM 0136 – I.C.

Motion carried unanimously.

#### *23 PHM 141 – M.H.G.*

**MOTION:** Christa Wilson moved, seconded by John Weitekamp, to issue an Administrative Warning in the matter of M.H.G., DLSC Case Number 23 PHM 141. Motion carried unanimously.

*(Tiffany O'Hagan recused and left the room for deliberation and voting in the matter concerning M.H.G., DLSC Case Number 23 PHM 141.)*

## **Proposed Stipulations, Final Decisions and Orders**

### ***24 PHM 0027 – Jennifer M. Betts***

**MOTION:** Christa Wilson moved, seconded by Erick Sokn, to adopt the Findings of Fact, Conclusions of Law and Order in the matter against Jennifer M. Betts, DLSC Case Number 24 PHM 0027. Motion carried unanimously.

*(Tiffany O'Hagan recused and left the room for deliberation and voting in the matter concerning DLSC Case Number 24 PHM 0027.)*

## **Case Closings**

**MOTION:** John Weitekamp moved, seconded by Christa Wilson, to close the following DLSC Cases for the reasons outlined below:

1. 22 PHM 195 – R.T. – Prosecutorial Discretion (P2)
2. 23 PHM 091 – R.P.P. – Lack of Jurisdiction (L2)
3. 23 PHM 128 – O.S.S., C.P. – Prosecutorial Discretion (P2)
4. 23 PHM 141 – W. – Insufficient Evidence
5. 23 PHM 145 – W. – No Violation
6. 24 PHM 0027 – W. – No Violation
7. 24 PHM 0111 – W. – Insufficient Evidence
8. 24 PHM 0119 – R. – Prosecutorial Discretion (P1)
9. 25 PHM 0023 – F.K. – Insufficient Evidence
10. 25 PHM 0076 – B.S.O. – Prosecutorial Discretion (P2)
11. 25 PHM 0089 – A.M. – No Violation

Motion carried unanimously.

## **Proposed Stipulations, Final Decisions and Orders**

**MOTION:** Christa Wilson moved, seconded by Tiffany O'Hagan, to adopt the Findings of Fact, Conclusions of Law and Order in the matter of the following cases:

1. 22 PHM 195 – Soojin Oh
2. 24 PHM 0103 – Jamal J. Jaber

Motion carried unanimously.

### **RECONVENE TO OPEN SESSION**

**MOTION:** Christa Wilson moved, seconded by Anthony Peterangelo, to reconvene into Open Session. Motion carried unanimously.

The Board reconvened into Open Session at 2:06 p.m.

## **VOTING ON ITEMS CONSIDERED OR DELIBERATED UPON IN CLOSED SESSION**

**MOTION:** Anthony Peterangelo moved, seconded by Erick Sokn, 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:** Christa Wilson moved, seconded by Erick Sokn, to adjourn the meeting. Motion carried unanimously.

The meeting adjourned at 2:09 p.m.

DRAFT

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

**AGENDA REQUEST FORM**

<b>1) Name and title of person submitting the request:</b>  Nilajah Hardin Administrative Rules Coordinator		<b>2) Date when request submitted:</b> 10/02/25 <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>											
<b>3) Name of Board, Committee, Council, Sections:</b> Pharmacy Examining Board													
<b>4) Meeting Date:</b> 10/16/25	<b>5) Attachments:</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>6) How should the item be titled on the agenda page?</b>  <b>Administrative Rule Matters – Discussion and Consideration</b> <ol style="list-style-type: none"> <li>1. Emergency Rule Draft: Phar 1, 6 ,7, and 10, Relating to Pharmacy Workplace Conditions</li> <li>2. Scope Statement: Phar 1 and 7, Relating to Patient Drug Information Monographs</li> <li>3. Pending or Possible Rulemaking Projects</li> </ol>											
<b>7) Place Item in:</b> <input checked="" type="checkbox"/> Open Session <input type="checkbox"/> Closed Session	<b>8) Is an appearance before the Board being scheduled?</b> <i>(If yes, please complete <a href="#">Appearance Request</a> for Non-DSPS Staff)</i>  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>9) Name of Case Advisor(s), if required:</b>  N/A											
<b>10) Describe the issue and action that should be addressed:</b> Attachments: <ol style="list-style-type: none"> <li>1. Phar 1, 6, ,7 10 Emergency Rule Draft</li> <li>2. Phar 1 and 7 Scope Statement</li> <li>3. Rule Projects Chart</li> </ol> Copies of current Board Rule Projects Can be Viewed Here: <a href="https://dsps.wi.gov/Pages/RulesStatutes/PendingRules.aspx">https://dsps.wi.gov/Pages/RulesStatutes/PendingRules.aspx</a>													
<table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;"><b>11) Authorization/</b></td> <td style="width: 40%; border: none;"></td> </tr> <tr> <td style="border: none;"> <div style="display: flex; justify-content: space-between;"> <div style="border-bottom: 1px solid black; width: 80%;"> </div> <div style="border-bottom: 1px solid black; width: 15%;">           10/02/25         </div> </div> </td> <td style="border: none;"></td> </tr> <tr> <td style="border: none;">Signature of person making this request</td> <td style="border: none;">Date</td> </tr> <tr> <td style="border: none;">Supervisor (if required)</td> <td style="border: none;">Date</td> </tr> <tr> <td colspan="2" style="border: none;">           Executive Director signature (indicates approval to add post agenda deadline item to agenda)    Date         </td> </tr> </table>				<b>11) Authorization/</b>		<div style="display: flex; justify-content: space-between;"> <div style="border-bottom: 1px solid black; width: 80%;"> </div> <div style="border-bottom: 1px solid black; width: 15%;">           10/02/25         </div> </div>		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	
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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													
<b>Directions for including supporting documents:</b> <ol style="list-style-type: none"> <li>1. This form should be attached to any documents submitted to the agenda.</li> <li>2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director.</li> <li>3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.</li> </ol>													

STATE OF WISCONSIN  
PHARMACY EXAMINING BOARD

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IN THE MATTER OF RULEMAKING	:	ORDER OF THE
PROCEEDINGS BEFORE THE	:	PHARMACY EXAMINING BOARD
PHARMACY EXAMINING BOARD	:	ADOPTING EMERGENCY RULES

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The statement of scope for this rule, SS 002-25, was approved by the Governor on December 20, 2024, published in Register 829A2 on January 13, 2025, and approved by the Pharmacy Examining Board on March 12, 2025. This emergency rule was approved by the Governor on (date).

ORDER

An order of the Pharmacy Examining Board to amend Phar 10.03 (2), (13), and (17) and create Phar 6.09, relating to pharmacy workplace conditions.

Analysis prepared by the Department of Safety and Professional Services.

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FINDING OF EMERGENCY

The Pharmacy Examining Board has identified a concern related to workplace safety including concerning behavior involving prescription accuracy, performing vaccinations, and patient care, among other areas of Pharmacy practice in the workplace. Due to these concerns, the Board deems an emergency rule to be appropriate to address the imminent issues to public safety and welfare.

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ANALYSIS

**Statutes interpreted:** ss. 450.02 (2) and 450.02 (3) (d) and (e), Stats.

**Statutory authority:** ss. 15.08 (5) (b), 450.02 (2), 450.02 (3) (b), (d), and (e), Stats.

**Explanation of agency authority:**

Section 15.08 (5) (b), Stats. states that the Board “[s]hall promulgate rules for its own guidance and for the guidance of the trade or profession to which it pertains, and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular trade or profession.”

Section 450.02 (2), Stats., states that “[t]he board shall promulgate rules that do all of the following:

(a) Define the active practice of pharmacy. The rules shall apply to all applicants for licensure under s. 450.05.

(b) Define the activities that constitute the practice of a pharmacy technician for purposes if the registration requirement under s. 450.068.”

Section 450.02 (3) (b), Stats., states “[t]he board may promulgate rules... [e]stablishing security standards for pharmacies.”

Section 450.02 (3) (d), Stats., states “[t]he board may promulgate rules...[n]ecessary for the administration and enforcement of this chapter and ch. 961.”

Section 450.02 (3) (e), Stats., states “[t]he board may promulgate rules...[e]stablishing minimum standards for the practice of pharmacy.”

**Related statute or rule:** None.

**Plain language analysis:** The objective of the proposed rule is to amend requirements in the Wisconsin Administrative Code to increase public safety by improving working conditions in pharmacies. The Board achieved this objective by creating Phar 6.09, which consists of requirements related to working conditions in pharmacies. The Board also amended Phar 10.03 (2), (13), and (17) to include that they now also apply to as unprofessional conduct for the pharmacy license.

**Summary of, and comparison with, existing or proposed federal regulation:** None.

**Comparison with rules in adjacent states:**

**Illinois:** The Illinois Department of Financial and Professional Regulation is responsible for the licensure and regulation of Pharmacy in Illinois, with input from the Illinois Board of Pharmacy. The Illinois Pharmacy Practice Act contains various requirements on licensure, dispensing, and practice. Some of those requirements include pharmacy working conditions. In Illinois, a pharmacy cannot require any pharmacy staff to work more than 12 continuous hours per day. A pharmacy shall also allow pharmacists who work 6 continuous hours or longer to take at least one 30 minute break and one 15 minute break during that 6 hour period. If the pharmacy has a private break room, a pharmacist who qualifies for breaks shall have access to this room. The pharmacy may choose to close when the pharmacist is on break. If the pharmacy does not close, the pharmacist on break must remain within the pharmacy or the building where the pharmacy is located. Only prescriptions that have received final verification by a pharmacist may be dispensed while a pharmacist is on break. Additionally, a license may be revoked or have disciplinary action taken against it for failing to provide a working environment that protects the health and safety of a patient. This includes failure to employ sufficient pharmacy staff, provide breaks, and enough time for pharmacists to complete their professional duties [225 Illinois Compiled Statutes ch. 85 ss. 15.1 and 30].

**Iowa:** The Iowa Board of Pharmacy is responsible for the licensure and regulation of Pharmacy practice in Iowa. The Iowa Administrative Code includes various pharmacy practice rules. Some of those requirements include standards for pharmacies such as adequate drug storage under sanitary conditions, policies and procedures for pharmacy operation, equipment as needed to serve patient needs maintained pursuant to manufacturer recommendations, and the current pharmacist's license displayed within view of the public. Additionally, in Iowa unprofessional conduct includes negating a patient's freedom of choice in pharmacy services and breaching the public trust in terms of the practice of pharmacy [481 Iowa Administrative Code ch. 552 ss. 552.2 and 552.11].

**Michigan:** The Michigan Board of Pharmacy is responsible for the licensure and regulation of pharmacy practice in Michigan. Many pharmacy practice regulations are located in the Michigan Administrative Rules and include requirements for pharmacies. In Michigan, pharmacies are required to be equipped with the necessary facilities to provide efficient services [Michigan Administrative Rules R 338.537].

**Minnesota:** The Minnesota Board of Pharmacy is responsible for the licensure and regulation of pharmacy practice in Minnesota. Part 6800 of the Minnesota Administrative Code includes regulations for pharmacy in Minnesota. Some of those regulations include requirements for pharmacy work conditions. In Minnesota, a pharmacy cannot require pharmacists or pharmacy technicians to work more than 12 hours per day including breaks. Those working more than 6 hours per day are allowed a 30-minute uninterrupted break. If a pharmacy chooses to stay open while the pharmacist is on break, the pharmacist needs to stay within the pharmacy or within the establishment for emergencies. Only prescriptions that have been approved by the pharmacist to be dispensed without counseling may be sold while the pharmacist is on break. These work conditions do not apply to an emergency situation that necessitates longer working hours or no breaks to minimize immediate patient health risks. Additionally, it is unprofessional conduct for a pharmacist or pharmacy to engage in practice that causes a danger to the patient or public [Minnesota Administrative Rules part 6800, sections 6800.2160 and 6800.2250].

**Summary of factual data and analytical methodologies:** The Pharmacy Examining Board completed a comprehensive review of Wisconsin Administrative Code Chapters Phar 1, 6, 7 and 10 and made changes as needed. The Board utilized references from Virginia's pharmacy rules and regulations, National Association of Boards of Pharmacy, and other sources.

**Fiscal Estimate:** The Fiscal Estimate will be attached upon completion.

**Effect on small business:**

These proposed rules do not have an economic impact on small businesses, as defined in s. 227.114 (1), Stats. The Department's Regulatory Review Coordinator may be contacted by email at [Jennifer.Garrett@wisconsin.gov](mailto:Jennifer.Garrett@wisconsin.gov), or by calling (608) 266-2112.

**Agency contact person:**

Nilajah Hardin, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, 4822 Madison Yards Way, P.O. Box 8366, Madison, Wisconsin 53708; telephone 608-267-7139; email at DSPSAdminRules@wisconsin.gov.

**Place where comments are to be submitted and deadline for submission:**

Comments may be submitted to Nilajah Hardin, Administrative Rules Coordinator, Department of Safety and Professional Services, Division of Policy Development, 4822 Madison Yards Way, P.O. Box 8366, Madison, WI 53708-8366, or by email to DSPSAdminRules@wisconsin.gov. Comments must be received on or before the public hearing, held on a date to be determined, to be included in the record of rule-making proceedings.

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TEXT OF RULE

SECTION 1. Phar 6.09 is created to read:

**Phar 6.09 Workplace Conditions.** A pharmacy shall provide a safe working environment by ensuring all of the following:

- (1) Determine appropriate staffing levels to operate in a safe and effective manner in consultation with the managing pharmacist.
- (2) Carry and utilize equipment as needed to meet the needs of the patients served that is maintained in accordance with manufacturer recommendations.
- (3) That enough time is allotted for pharmacy staff to complete services safely and accurately.
- (4) That staff are sufficiently trained and demonstrate competency in their assigned tasks as determined by the managing pharmacist.
- (5) That the pharmacy shall not override the managing pharmacist when using their professional judgement regarding all aspects of pharmacy practice, including whether vaccines can be administered in a safe manner.

SECTION 2. Phar 10.03 (2), (13) and (17) are amended to read:

**Phar 10.03 (2)** Engaging in any pharmacy practice which constitutes a danger to the health, welfare, or safety of patient or public, including but not limited to, practicing in a manner which substantially departs from the standard of care ordinarily exercised by a pharmacy, pharmacist or pharmacy technician which harmed or could have harmed a patient.

**(13)** Exercising undue influence on or taking unfair advantage of a patient in the promotion or sale of services, drugs or other products for the financial gain of the pharmacy, pharmacist or a third party.



(17) Having a pharmacy license, pharmacist license or pharmacy technician registration revoked or suspended in another state or United States jurisdiction or having been subject to other disciplinary action by the licensing authority thereof.

SECTION 3. This emergency rule shall take effect upon publication in the official state newspaper.

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(END OF TEXT OF RULE)  
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Dated \_\_\_\_\_

Agency \_\_\_\_\_

Chairperson  
Pharmacy Examining Board

# STATEMENT OF SCOPE

## PHARMACY EXAMINING BOARD

**Rule No.:** Phar 1 and 7

**Relating to:** Patient Drug Information Monographs

**Rule Type:** Permanent

**1. Finding/nature of emergency (Emergency Rule only):** N/A

**2. Detailed description of the objective of the proposed rule:** The objective of the proposed rule is to clarify requirements in the Wisconsin Administrative Code about patient drug information monographs.

**3. Description of the existing policies relevant to the rule, new policies proposed to be included in the rule, and an analysis of policy alternatives:**

Wisconsin Administrative Code Chapter Phar 7 currently requires a written drug monograph to be provided as part of a patient prescription consultation. The Board is looking to clarify the inclusion of both electronically provided and standard written drug monographs and the procedures associated to ensure patient safety. Chapter Phar 1 may need to be updated as a result of these changes. An alternative to amending these provisions is that the administrative code will continue to be ambiguous on drug monographs and the specific procedure for providing them to patients in a safe and effective manner.

**4. Detailed explanation of statutory authority for the rule (including the statutory citation and language):**

15.08 (5) (b), Stats., states that the Board “[s]hall promulgate rules for its own guidance and for the guidance of the trade or profession to which it pertains, and define and enforce professional conduct and unethical practices not inconsistent with the law relating to the particular trade or profession.”

450.02 (2), Stats., states that “[t]he board shall promulgate rules that do all of the following:

(a) Define the active practice of pharmacy. The rules shall apply to all applicants for licensure under s. 450.05.

(b) Define the activities that constitute the practice of a pharmacy technician for purposes if the registration requirement under s. 450.68.”

450.02 (3) (a), Stats., states “[t]he board may promulgate rules...[r]elating to the manufacture of drugs and the distribution and dispensing of prescription drugs.”

450.02 (3) (c), Stats., states “[t]he board may promulgate rules...[r]elating to the manufacture, distribution and dispensing of hypodermic syringes, needles and other objects used, intended for use or designed for use in injecting a drug.”

450.02 (3) (d), Stats., states “[t]he board may promulgate rules...[n]ecessary for the administration and enforcement of this chapter and ch. 961.”

450.02 (3) (e), Stats., states “[t]he board may promulgate rules...[e]stablishing minimum standards for the practice of pharmacy.”

**5. Estimate of amount of time that state employees will spend developing the rule and of other resources necessary to develop the rule:**

120 hours

**6. List with description of all entities that may be affected by the proposed rule:**

Licensed Pharmacies, Pharmacists; Registered Pharmacy Technicians, and their employers.

**7. Summary and preliminary comparison with any existing or proposed federal regulation that is intended to address the activities to be regulated by the proposed rule:** None.

**8. Anticipated economic impact of implementing the rule (note if the rule is likely to have a significant economic impact on small businesses):**

None to minimal. This rule is not likely to have a significant economic impact on small businesses.

**Contact Person:** Nilajah Hardin, Administrative Rules Coordinator, (608) 267-7139

Approved for publication:

Approved for implementation:

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Authorized Signature

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Authorized Signature

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Date Submitted

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Date Submitted

**Pharmacy Examining Board**  
**Rule Projects (updated 10/02/25)**

CH Rule Number	Scope Number	Scope Expiration Date	Code Chapter Affected	Relating Clause	Stage of Rule Process	Next Step
Not Assigned Yet	Not Assigned Yet	TBD	Phar 1 and 7	Patient Drug Information Monographs	Scope Statement Reviewed at 10/16/25 Meeting	Board Approval of Scope Statement for Submission to Governor's Office and for Publication
Not Assigned Yet	002-25	07/13/2027	Phar 1. 6, 7, and 10	Pharmacy Workplace Conditions	Emergency Rule Draft Reviewed at 10/16/25 Meeting	Board Approval of Emergency Rule Draft for Submission to Governor's Office and for Publication
Not Assigned Yet	089-24	05/05/2027	Phar 7	Electronic Prescriptions, Prescription Labeling, CPR for Pharmacists, Epinephrine Delivery Systems, Controlled Substance Prescription Transfers, Remote Dispensing, Managing Pharmacist Definition, Initial Consultation, Alteration, and Final Check	Clearinghouse Review	Public Hearing Scheduled for 12/18/25 Meeting
24-092	007-23	07/23/2025	Phar 15	Compounding Pharmaceuticals	Effective 10/1/25	N/A


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

**AGENDA REQUEST FORM**

1) Name and title of person submitting the request: Brad Wojciechowski, Executive Director		2) Date when request submitted: 9/29/2025 <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: Pharmacy Examining Board			
4) Meeting Date: 10/16/2025	5) Attachments: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6) How should the item be titled on the agenda page? Speaking Engagements, Travel, Or Public Relation Requests, and Reports 1) Travel Report: 2025 District IV NABP/AACP Meeting, September 10-12, 2025, Fort Wayne, IN – O'Hagan, Wojciechowski 2) Travel Report: MPJE State-Specific Review, September 17-19, 2025, Mt. Prospect, IL – O'Hagan, Weitekamp	
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 <a href="#">Appearance Request</a> for Non-DSPS Staff)</i> <input type="checkbox"/> Yes <Appearance Name(s)> <input type="checkbox"/> No		9) Name of Case Advisor(s), if applicable: <Click Here to Add Case Advisor Name or N/A>
10) Describe the issue and action that should be addressed: <Click Here to Add Description>			
11) <span style="float: right;">Authorization</span> <div style="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 20px;"> <div style="width: 60%;">   <hr/>           Signature of person making this request         </div> <div style="width: 35%; text-align: right;">           9/29/2025  <hr/>           Date         </div> </div> <div style="margin-top: 10px;"> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;">Supervisor (Only required for post agenda deadline items)</div> <div style="width: 35%; text-align: right;">Date</div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;">Executive Director signature (Indicates approval for post agenda deadline items)</div> <div style="width: 35%; text-align: right;">Date</div> </div> </div>			
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the <a href="#">Agenda Items</a> folders. 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.			

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

**AGENDA REQUEST FORM**

1) Name and title of person submitting the request: Brenda Taylor, Board Services Supervisor		8/21/2025	
3) Name of Board: Pharmacy Examining Board			
4) Meeting Date: 10/16/2025	5) Attachments: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6) How should the item be titled on the agenda page? Newsletter Matters	
7) Place Item in: <input checked="" type="checkbox"/> Open Session	8) Is an appearance before the Board being scheduled? <input checked="" type="checkbox"/> No	9) Name of Case Advisor(s), if applicable: N/A	
<p>10) Describe the issue and action that should be addressed: Please discuss deadlines and consider topics for the next newsletter.</p> <p>January 2026 issue</p> <ul style="list-style-type: none"> <li>Chairs Corner: John Weitekamp</li> <li>Article:</li> <li>Article:</li> <li>Article:</li> <li>Orders update?</li> <li>Deadline: Friday, November 14, 2025</li> </ul> <p>Articles/Ideas:</p> <ul style="list-style-type: none"> <li>Archive: <a href="https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Newsletters.aspx">https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Newsletters.aspx</a></li> </ul> <p><b>Discussion:</b> Is this a newsletter or announcement for the Pharmacy Examining Board Website? <a href="https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Default.aspx">https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Default.aspx</a></p>			
<p>11) <span style="float: right;">Authorization</span></p> <div style="display: flex; justify-content: space-between; align-items: flex-end; margin-top: 20px;"> <div style="text-align: center;">  </div> <div style="text-align: right;"> <p>8/21/2025</p> </div> </div>			
Signature of person making this request		Date	
<p>Directions for including supporting documents:</p> <ol style="list-style-type: none"> <li>This form should be saved with any other documents submitted to the <a href="#">Agenda Items</a> folders.</li> <li>Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director.</li> <li>If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.</li> </ol>			