



**VIRTUAL/TELECONFERENCE
PHARMACY EXAMINING BOARD
Virtual, 4822 Madison Yards Way, Madison
Contact: Brad Wojciechowski (608) 266-2112
February 26, 2026**

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 December 18, 2025 (5-10)**
- C. Reminders: Conflicts of Interest, Scheduling Concerns
- D. Introductions, Announcements and Recognition
- E. Administrative Matters – Discussion and Consideration**
 - 1. Department, Staff and Board Updates
 - 2. 2026 Meeting Dates (11)**
 - 3. Annual Policy Review (12-15)**
 - 4. Election of Officers, Appointments of Liaisons and Alternates, Delegation of Authorities (16-38)**
 - 5. Board Members – Term Expiration Dates
 - a. Esser, Paul T. – 7/1/2029
 - b. O’Hagan, Tiffany M. – 7/1/2028
 - c. Peterangelo, Anthony – 7/1/2027
 - d. Sokn, Erick – 7/1/2029
 - e. Weitekamp, John G. – 7/1/2026
 - f. Wilson, Christa – 7/1/2029
- F. 11:00 A.M. Public Hearing for Emergency Rule 2601 and Clearinghouse Rule 26-013 on Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions (39-53)**
 - 1. Review Public Hearing Comments and Respond to Clearinghouse Report
- G. Legislative and Policy Matters – Discussion and Consideration (54-94)**
 - 1. 2025 WI Senate Bill 832/2025 WI Assembly Bill 842
 - 2. 2025 WI Senate Bill 898/2025 WI Assembly Bill 899
- H. Administrative Rule Matters – Discussion and Consideration (95-96)**

1. Preliminary Rule Draft: Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions
2. Pending or Possible Rulemaking Projects

I. Interdisciplinary Advisory Committee – Discussion and Consideration

J. Guidance on Compounding Pharmacies, Phar 15, and Semaglutide/Tirzepatide Production – Discussion and Consideration (97)

K. Speaking Engagements, Travel, or Public Relation Requests, and Reports – Discussion and Consideration (98-113)

1. Consider Attendance: MPJE Item Development Workshop – March 11-13, 2026 – Mt. Prospect, IL
2. Travel Report: PSW Legislative Day, -- February 11, 2026 – Weitekamp

L. Newsletter Matters – Discussion and Consideration

M. Credentialing Matters – Discussion and Consideration

N. National Association of Boards of Pharmacy Matters – Discussion and Consideration

O. NABP Pulse Regulator Monthly Champions Call – Discussion and Consideration

P. Liaison Reports – Discussion and Consideration

Q. 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

R. 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.).

S. Credentialing Matters

1. Application Review

- a. B.P. – Wholesale Distributor Application (IA- 692754) **(114-209)**
- b. P. – Wholesale Distributor Application (IA- 582662) **(210-282)**

T. Deliberation on Division of Legal Services and Compliance Matters

1. Administrative Warnings

- a. 24 PHM 0114 – H.K.L.T. **(283-295)**
- b. 24 PHM 0116 – F.P. **(296-302)**
- c. 24 PHM 0116 – J.H.B. **(303-309)**
- d. 24 PHM 0170 – O.H. **(310-314)**
- e. 25 PHM 0025 – J.A.J. **(315-322)**

2. Case Closings

- a. 24 PHM 0046 – W.P., K.G., C.L.N., and D.B. **(323-330)**
- b. 24 PHM 00980 – M. **(331-336)**
- c. 24 PHM 0114 – W. **(337-348)**
- d. 24 PHM 0132 – M.M.P. #132 **(349-351)**
- e. 24 PHM 0134 – M.P. **(352-355)**
- f. 24 PHM 0163 – C.V.S. **(356-364)**
- g. 25 PHM 0025 – W. **(365-371)**
- h. 25 PHM 0094 – T.C.I., S.G., P.R.H., M.B., J.D.R., C.F.L.H. and S.A.K. **(372-380)**
- i. 25 PHM 0103 – A.B. **(381-383)**
- j. 25 PHM 0126 – W. **(384-386)**
- k. 25 PHM 0157 – A.M.I. **(387-392)**

3. Proposed Stipulations, Final Decisions and Orders

- a. 25 PHM 0080 – Ann C. Miller **(393-398)**

U. Deliberation on Proposed Final Decision and Orders

1. Adrianna P. Bodnarick – DHA Case Number, SPS-25-0072/DLSC Case Number, 24 PHM 0117 **(399-411)**

V. 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

W. Consulting with Legal Counsel

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

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

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

ADJOURNMENT

NEXT MEETING: APRIL 16, 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
PHARMACY EXAMINING BOARD
MEETING MINUTES
DECEMBER 18, 2025**

PRESENT: Paul Esser, Tiffany O’Hagan, Anthony Peterangelo, Erick Sokn, John Weitekamp, Christa Wilson

STAFF: Brad Wojciechowski, Executive Director; Gretchen Mrozinski, Legal Counsel; Nilajah Hardin, Administrative Rules Coordinator; Ashley Sarnosky, 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 six (6) members present.

ADOPTION OF AGENDA

Amendments to the Agenda:

- *Change item U.2.a. 23 PHM 104 to a PDO*

MOTION: Paul Esser moved, seconded by Tony Peterangelo, to adopt the Agenda as amended. Motion carried unanimously.

APPROVAL OF MINUTES OF OCTOBER 16, 2025

MOTION: Christa Wilson moved, seconded by Erick Sokn, to approve the Minutes of October 16, 2025, as published. 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: John Weitekamp</i>
Monitoring Liaison(s)	Michael Walsh, Christa Wilson <i>Alternate: Anthony Peterangelo</i>
Professional Assistance Procedure (PAP) Liaison(s)	Anthony Peterangelo <i>Alternate: Erick Sokn</i>
Travel Authorization Liaison(s)	John Weitekamp

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

ADMINISTRATIVE RULE MATTERS

Preliminary Rule Draft: Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions

MOTION: Erick Sokn moved, seconded by Christa Wilson, to designate the Chairperson to approve the preliminary rule draft once corrected of Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions, for posting for economic impact comments and submission to the Clearinghouse. Motion carried unanimously.

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

Consider Attendance: 122nd NABP Annual Meeting – May 12-15, 2026 – Boston, MA

MOTION: Christa Wilson moved, seconded by Anthony Peterangelo, to designate Tiffany O’Hagan, John Weitekamp, Christa Wilson, Anthony Peterangelo and Brad Wojciechowski to attend the 122nd NABP Annual Meeting on May 12-15 in Boston, MA. Motion carried unanimously.

IMPLEMENT 2021 WISCONSIN ACT 9 – TOP 100 MOST PRESCRIBED DRUGS – DISCUSSION AND CONSIDERATION

MOTION: Paul Esser moved, seconded by Erick Sokn, to approve the Top 100 Most Prescribed Drugs with DSPS Staff for publication on the DSPS website. Motion carried unanimously.

GUIDANCE ON COMPOUNDING PHARMACIES, PHAR 15, AND SEMAGLUTIDE/TIRZEPATIDE PRODUCTION – DISCUSSION AND CONSIDERATION

MOTION: Erick Sokn moved, seconded by Paul Esser, to appoint Erick Sokn to work with Department staff to draft a guidance document concerning the compounding of GLP-1 medications in relation to Wis. Admin. Code ch. Phar 15, for Board consideration. Motion carried unanimously.

CLOSED SESSION

MOTION: Erick Sokn 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: Paul Esser-yes; 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 12:21 p.m.

CREDENTIALING MATTERS

Application Review

B.S.O. – Wholesale Distributor Application (IA- 672656)

MOTION: Erick Sokn moved, seconded by Paul Esser, to authorize Board Counsel to request additional information from Applicant IA-672656. Motion carried unanimously.

B.P. – Wholesale Distributor Application (IA- 692754)

MOTION: Anthony Peterangelo moved, seconded by Erick Sokn, to authorize Board Counsel to request additional information from Applicant IA-692754. Motion carried unanimously.

C.W. – Wholesale Distributor Application (IA- 695214)

MOTION: Erick Sokn moved, seconded by John Weitekamp, to approve the Wholesale Distributor application IA-695214, once all requirements are met. Motion carried unanimously.

C.S.B. – Pharmacy Technician Application (IA- 397000)

MOTION: Paul Esser moved, seconded by Anthony Peterangelo, to authorize Board Counsel to request additional information from Applicant IA-397000. Motion carried unanimously.

R.P.M. – Pharmacist Application (IA- 104328)

MOTION: Paul Esser moved, seconded by Erick Sokn, to authorize Board Counsel to send a three-option letter for application IA-104328 for Pharmacist. Motion carried unanimously.

Inspection Report Review Follow Up

P. – Pharmacy (Out-of-State) (IA-582662)

MOTION: John Weitekamp moved, seconded by Christa Wilson, to authorize Board Counsel to request additional information from Applicant IA-582662. Motion carried unanimously.

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

Administrative Warnings

MOTION: Paul Esser moved, seconded by Anthony Peterangelo, to issue an Administrative Warning in the following DLSC Cases:

1. 24 PHM 0071 – E.P.
2. 24 PHM 0071 – K.C.T.
3. 24 PHM 0157 – J.L.T.

Motion carried unanimously.

Case Closings

MOTION: John Weitekamp moved, seconded by Anthony Peterangelo, to close the following DLSC Cases for the reasons outlined below:

1. 23 PHM 147 – A.R. – No Violation
2. 24 PHM 0109 – A.P.L. – No Violation
3. 24 PHM 0116 – W. – No Violation
4. 24 PHM 0133 – M.D. – Prosecutorial Discretion (P2)
5. 24 PHM 0133 – M.D.C.R. – No Violation
6. 24 PHM 0143 – M.M.P. – No Violation
7. 24 PHM 0157 – C.V.S. and P.L.R. – No Violation
8. 24 PHM 0161 – F.D.C. and L.A.G. – No Violation and Lack of Jurisdiction
9. 24 PHM 0178 – C.V.S. and S.J.W. – No Violation
10. 25 PHM 0012 – M.F.P. – No Violation
11. 25 PHM 0077 – P., P.L., P. and P.L. – No Violation

Motion carried unanimously.

MOTION: Anthony Peterangelo moved, seconded by Paul Esser, to close the following DLSC Cases for the reasons outlined below:

1. 24 PHM 012 – W. – Prosecutorial Discretion (P2)
2. 25 PHM 0117 – W.P. – Prosecutorial Discretion (P1)

Motion carried unanimously.

Proposed Stipulations, Final Decisions and Orders

MOTION: Anthony Peterangelo 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. 24 PHM 0137 – Daniel L. Zatarski
2. 24 PHM 0143 – Julie A. Harer

Motion carried unanimously.

DELIBERATION ON PROPOSED FINAL DECISION AND ORDERS

John A. Harter – DHA Case Number, SPS-24-0053/DLSC Case Number, 23 PHM 104

MOTION: Paul Esser moved, seconded by Erick Sokn, to adopt the Findings of Fact, Conclusions of Law, and Proposed Decision and Order, in the matter of disciplinary proceedings against John A. Harter, Respondent – DHA Case Number SPS-24-0053/DLSC Case Number 23 PHM 104. Motion carried unanimously.

(Christa Wilson recused and left the room for deliberation and voting in the matter concerning John A. Harter – DHA Case Number, SPS-24-0053/DLSC Case Number, 23 PHM 104.)

RECONVENE TO OPEN SESSION

MOTION: Erick Sokn moved, seconded by Anthony Peterangelo, to reconvene into Open Session. Motion carried unanimously.

The Board reconvened into Open Session at 2:24 p.m.

VOTING ON ITEMS CONSIDERED OR DELIBERATED UPON IN CLOSED SESSION

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

The meeting adjourned at 2:25 p.m.

**PHARMACY EXAMINING BOARD
2026 MEETING DATES**

Meeting Date	PHM Rules Committee	PHM Board	Location	Agenda Item Deadline
Thursday, February 26, 2026	9:00 AM	11:00 AM	Virtual	2/16/2026
Thursday, April 16, 2026	9:00 AM	11:00 AM	Hybrid	4/6/2026
Thursday, June 18, 2026	9:00 AM	11:00 AM	Virtual	6/8/2026
Thursday, August 20, 2026	9:00 AM	11:00 AM	Virtual	8/10/2026
Thursday, October 15, 2026	9:00 AM	11:00 AM	Hybrid	10/5/2026
Thursday, December 17, 2026	9:00 AM	11:00 AM	Virtual	12/7/2026

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

AGENDA REQUEST FORM

- 1) Name and title of person submitting the request: Audra Cohen-Plata, DPD Division Administrator
 - 2) Date When Request Submitted: 12/11/2025
 - 3) Name of Board, Committee, Council, Section: **All Boards**
 - 4) Meeting Date: **First Meeting of 2026**
-

- 5) Attachments: **Yes**
 - 6) How should the item be titled on the agenda page? **Administrative Matters: Annual Policy Review**
 - 7) Place Item in: **Open Session**
 - 8) Is an appearance before the Board being scheduled? No
 - 9) Name of Case Advisor(s), if applicable: N/A
-

10) Describe the issue and action that should be addressed:

Please be advised of the following policy item attachments:

- 1) 2026 Annual Policy Review Memo
- 2) Timeline of a Meeting
- 3) Sample Per Diem Report



DATE: January 1, 2026
TO: DSPS Board, Council, and Committee Members
FROM: Division of Policy Development
SUBJECT: 2026 Administrative Policy Reminders

Please be advised of the following policy items:

1. In-Person and Virtual Meetings: Depending on the frequency of scheduled meetings, discussion topics, and member availability, DSPS may host one or more in-person meetings. Virtual connection options are available for all board meetings. If you are traveling internationally, please see item 9 below.
2. Attendance/Quorum: Thank you for your service and commitment to meeting attendance. If you cannot attend a meeting or have scheduling conflicts impacting your attendance, please let us know as soon as possible. A quorum is required for Boards, Sections, and Councils to meet pursuant to Open Meetings Law. Connect to / arrive at meetings 10 minutes before posted start time to allow for audio/connection testing, and timely Call to Order and Roll Call. Virtual meetings include viewable onscreen materials and A/V (speaker/microphone/video) connections.
3. Walking Quorum: Board/Section/Council members must not collectively discuss the body's business outside a properly noticed meeting. If several members of a body do so, they could be violating the open meetings law.
4. Mandatory Training: All Board Members must complete Public Records and Ethics Training, annually. [Register to set up an account](#) in the Cornerstone LearnCenter online portal or [Log in](#) to an existing account.
5. Agenda Deadlines: Please communicate agenda topics to your Executive Director before the agenda submission deadline at 12:00 p.m., eight business days before a meeting. (Attachment: Timeline of a Meeting)
6. Travel Voucher and Per Diem Submissions: Please submit all Per Diem and Reimbursement claims to DSPS within 30 days of the close of each month in which expenses are incurred. (Attachment: Per Diem Form) Travel Vouchers are distributed on travel approval.
7. Lodging Accommodations/Hotel Cancellation Policy: Lodging accommodations are available to eligible members for in-person meetings. Standard eligibility: the member must leave home before 6:00 a.m. to attend an in-person meeting by the scheduled start time.
 - a. If a member cannot attend a meeting, they must cancel their reservation with the hotel within the applicable cancellation timeframe.
 - b. If a meeting is changed to occur remotely, is canceled, or rescheduled, DSPS staff will cancel or modify reservations as appropriate.
8. Inclement Weather Policy: In inclement weather, the DSPS may change a meeting from an in-person venue to a virtual/teleconference only.
9. International Travel: Use of State-managed IT resources and access of State data outside the United States are strictly prohibited, as they cause an unacceptable level of cybersecurity risk. This prohibition includes all State-provided or State-managed IT resources housed on personal devices. Please advise your Executive Director of any planned international travel commitments that may coincide with board meetings or other board business in advance of your departure.

Timeline of a Meeting

At least 2 weeks (10 business days) prior to the meeting

Submit Agenda Item suggestions to the Board's Executive Director. Include background materials. Copyright-protected materials must be accompanied by written permission from the publisher to share documents.

8 business days prior to the meeting

The Agenda is drafted. (All agenda materials are due to the Department by 12:00 p.m.)

7 business days prior to the meeting

The draft agenda is submitted to the Executive Director; the Executive Director transmits it to the Chair for review and approval.

5 business days prior to the meeting

The approved agenda is returned to the Board Administration Specialist (BA) for agenda packet production and compilation.

4 business days prior to the meeting

Agenda packets are posted on the DSPS Board SharePoint site and on the Board webpage.

Agenda Item Examples:

- Open Session Items
 - Public Hearings and Administrative Rules Matters
 - Administrative Matters
 - Legislation and Policy Matters
 - Credentialing Matters
 - Education and Exam Issues
 - Public Agenda Requests
 - Current Issues Affecting the Profession
- Closed Session items
 - Deliberations on Proposed Disciplinary Actions
 - Monitoring Matters
 - Professional Assistance Procedure (PAP) Issues
 - Proposed Final Decisions and Orders
 - Orders Fixing Costs/Matters Relating to Costs
 - Credentialing Matters
 - Education and Exam Issues

Thursday of the Week Prior to the Meeting

Agendas are published for public notice on the Wisconsin Public Notices and Meeting Minutes website: publicmeetings.wi.gov.

1 business day after the Meeting

"Action" lists are distributed to Department staff detailing board actions on closed session business.

5 business days after the Meeting

"To Do" lists are distributed to staff to ensure that board open session decisions are acted on and/or implemented within the appropriate divisions in the Department. Minutes approved by the board are published on the Wisconsin Public Notices and Meeting Minutes website: publicmeetings.wi.gov.

PHARMACY EXAMINING BOARD
2025 Elections and Liaisons

ELECTION RESULTS	
Chairperson	John Weitekamp
Vice Chairperson	Tiffany O’Hagan
Secretary	Anthony Peterangelo

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)	Christa Wilson, Anthony Peterangelo <i>Alternate:</i>
Professional Assistance Procedure (PAP) Liaison(s)	Anthony Peterangelo <i>Alternate:</i> Erick Sokn
Travel Authorization Liaison(s)	John Weitekamp <i>Alternate:</i> Tiffany O’Hagan
Legislative Liaison(s)	Anthony Peterangelo, Tiffany O’Hagan, John Weitekamp
Pilot Program Liaison(s)	Tiffany O’Hagan, Anthony Peterangelo
Newsletter Liaison(s)	Christa Wilson <i>Alternate:</i> John Weitekamp
Website Liaison(s)	Christa Wilson
Appointed to Controlled Substances Board as per Wis. Stats. §15.405(5g)	John Weitekamp

PHARM Rep to SCAODA	Erick Sokn <i>Alternate: John Weitekamp</i>
Variance Liaison(s)	Tiffany O'Hagan <i>Alternate: Anthony Peterangelo</i>
Inspection Liaison(s)	Erick Sokn <i>Alternate: Tiffany O'Hagan</i>
SCREENING PANEL APPOINTMENTS	
Screening Panel	John Weitekamp, Tiffany O'Hagan, Erick Sokn, Paul Esser <i>Alternate: Anthony Peterangelo</i>
COMMITTEE MEMBER APPOINTMENTS	
Pharmacy Rules Committee	Erick Sokn, Tiffany O'Hagan, Anthony Peterangelo, John Weitekamp
OTHER APPOINTMENTS	
Interdisciplinary Advisory Council	John Weitekamp <i>Alternate: Christa Wilson</i>

Updated 12/18/2025

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

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Paralegal Richanda Turner, on behalf of Attorney Gretchen Mrozinski		2) Date when request submitted: 02/12/26 <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: 02/26/2025	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Reaffirming 2025 delegations and new 2026 delegations	
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 applicable: N/A	
10) Describe the issue and action that should be addressed: The Board members need to review and consider reaffirming 2025 delegations and new delegations for 2026.			
11) Authorization			
<i>Richanda Turner</i>		02/12/26	
Signature of person making this request		Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items 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 AND PROFESSIONAL SERVICES
CORRESPONDENCE / MEMORANDUM

DATE: January 1, 2026

TO: Board, Council, and Committee Members

FROM: Legal Counsel

SUBJECT: Liaison Definitions and Delegations Explanations

Executive Summary

This memorandum provides an overview of the liaison roles and common delegation authorities that enable DSPS Boards, Sections, and Committees to efficiently fulfill their statutory responsibilities. It explains the function of each liaison position, such as, Credentialing, Monitoring, PAP, Education and Examination, Legislative, Travel Authorization, and Communication Liaisons, as well as Screening Panel Members, and outlines how these roles support Board operations between meetings. This memorandum also includes model motions for liaisons, Department staff, and Department attorneys to ensure timely processing of credential applications, monitoring requests, disciplinary matters, and administrative tasks. The delegations promote consistency, reduce delays, and allow the Department and Boards to respond promptly to legal and operational needs while maintaining their responsibility to protect public health, safety, and welfare.

Overall Purpose of Liaison Appointments

Each Board/Section (Board) has inherent authority that is established in our Wisconsin Statutes. This authority may change from Board to Board. Further information on your Board's authority can be found in Wis. Stat. ch. 15. Generally, each Board has authority to grant credentials, discipline credential holders, and set standards for education and examinations and unprofessional conduct. In order to efficiently accomplish these tasks, Boards may appoint Liaisons. Liaisons assist with the operations of the Boards' purpose by weighing in on legislative matters, traveling to national conferences, or communicating with stakeholders.

At the first Board meeting of each year, the Department asks the Boards to make Liaison appointments. Your practical knowledge and experience as an appointed member of a professional board are essential in making determinations regularly. The Liaison positions listed below assist

the Department to complete operations between Board meetings. In most cases, Liaisons can make decisions for the full Board in their designated area. However, these areas are determined through the delegation process. Please note a Liaison may also decide to send the delegated matter to the full Board for consideration as appropriate. Delegations assist the Board in defining the roles and authorities of each Liaison and other Board functions.

Liaison Definitions

Credentialing Liaison: The Credentialing Liaison is empowered by the Board to review and make determinations regarding certain credential applications. The Credentialing Liaison may be called on by Department staff to answer questions that pertain to qualifications for licensure, which may include whether a particular degree is suitable for the application requirements, whether an applicant's specific work experience satisfies the requirements in statute or rule for licensure, or whether an applicant's criminal or disciplinary history is substantially related to the practice of the profession in such a way that granting the applicant a credential would create a risk of harm to the public. The Credentialing Liaison serves a very important role in the credentialing process. If the Credentialing Liaison has a question on a request, it is advisable for the Liaison to consult further with Department staff or bring the matter to the full Board for consideration.

Monitoring Liaison: The Monitoring Liaison is empowered by the Board to make decisions on any credential that is subject to Monitoring either through a disciplinary order or initial licensure. The Department Monitors will send requests from credential holders to the Monitoring Liaison. A common request could be to remove a limitation that has been placed on a credential or to petition for full licensure. The Monitoring Liaison can review these requests and make decisions on behalf of the Board. If the Monitoring Liaison has a question on a request, it is advisable for the Liaison to consult further with Department staff or bring the matter to the full Board for consideration.

Professional Assistance Procedure (PAP) Liaison: PAP is a voluntary program open to credential holders with substance abuse issues who wish to seek help by being held accountable through treatment and monitoring by the Department and Board. As part of PAP, the credential holder enters into an agreement with the Department to undergo testing, counseling, or other rehabilitation. The PAP Liaison's role includes responding to credential holders' requests for modifications and terminations of provisions of the agreement. Similar to the Monitoring Liaison, the Department Monitors will send requests from credential holders to the PAP Liaison for further review.

Education and Examination Liaison: Some Boards are required by statute or rule to approve qualifying education and examinations. The Education and Examination Liaison provides guidance to Department staff to exercise authority of the Board to approve or decline examinations and educational programs and related requests. This determination requires a level of professional expertise and should be performed by a professional member of the Board. For some Boards, the Education and Examination Liaison will also be tasked with approving continuing education programs and courses.

Legislative Liaison: The Legislative Liaison is not the Board's designated lobbyist and should exercise their delegated authority carefully. The Legislative Liaison is permitted to act and speak

on the Board's behalf regarding pending and enacted legislation or actions being considered by the legislature outside of Board meetings. Please review Wis. Stat. ch. 13 for important reminders on lobbying.

Travel Authorization Liaison: The Travel Authorization Liaison is authorized to approve a Board member to travel to events and speak or act on the Board's behalf between Board meetings. The Travel Authorization Liaison is called upon to make decisions when sufficient notice was not received, and the full Board could not determine a representative to travel. The Travel Authorization Liaison is tasked with making determinations if the Board appointed representative is not able to attend or if the Board becomes authorized to send additional members as scholarship and funding streams can be unpredictable.

Communication Liaison: The Communication Liaison responds to questions that arise on behalf of the Board. The Communication Liaison works with the Department to cultivate an appropriate response which will be sent by the Executive Director or Board Counsel. The Communication Liaison **can** be responsible for all types of communication on behalf of the Board. However, the Board can appoint a separate **Website Liaison** to work with DSPS staff to make changes and ensure the Board webpage contains updated and accurate information. Additionally, for the Boards that are required by statute to produce a newsletter or digest, the Board can appoint a separate **Newsletter/Digest Liaison** to assemble and approve content for those communications.

Screening Panel Members: Screening Panel Members review incoming complaints against credential holders and determine which complaints should be opened for investigation and which complaints should be closed without further action. The complexity and amount of work in this role depends substantially on your Board. As a member of the Screening Panel, you are asked to apply your professional expertise to determine if a complaint alleges unprofessional conduct.

Delegations Explanations

CREDENTIALING DELEGATIONS

The overall purpose of credentialing delegations is to allow the credentialing process to proceed as efficiently and effectively as possible.

Delegation of Authority to Credentialing Liaison (Generic)

MOTION EXAMPLE: to delegate authority to the Credentialing Liaison(s) to serve as a liaison between the Department and the Board and to act on behalf of the Board in regard to credentialing applications or questions presented to them, including the signing of documents related to applications.

PURPOSE: To allow a representative of the Board to assist Department staff with credentialing applications and eliminate the need for the entire Board to convene to consider credential application content or questions. Additionally, it is most efficient to have the designated liaison

who has assisted with the credentialing process be able to effectuate decisions which require a signature.

Delegation of Authority to DSPS When Credentialing Criteria is Met

MOTION EXAMPLE: to delegate credentialing authority to the Department to act upon applications that meet all credentialing statutory and regulatory requirements without Board or Board liaison review.

PURPOSE: To permit Department staff to efficiently issue credentials and eliminate the need for Board/Section/Liaison review when all credentialing legal requirements are met in an application. This delegation greatly decreases the workload of Board members and cuts down processing time on applications.

Delegation of Authority for Predetermination Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to make decisions regarding predetermination applications pursuant to Wis. Stat. § 111.335(4)(f).

PURPOSE: In general, the Wisconsin Fair Employment Act (codified in Wis. Stat. Ch. 111) prohibits licensing agencies from discriminating against applicants because of their arrest and/or conviction record. However, there are exceptions which permit denial of a license in certain circumstances. Individuals who do not possess a license have a legal right to apply for a determination of whether they are disqualified from obtaining a license due to their conviction record. This process is called “Predetermination.” Predetermination reviews must be completed within 30 days. This delegation allows Department attorneys to conduct predetermination reviews and efficiently make these legal determinations without need for Board/Section/Liaison review.

Delegation of Authority for Conviction Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve applications with convictions which are not substantially related to the relevant professional practice.

PURPOSE: As used here, “substantially related” is a legal standard that is used in the Wisconsin Fair Employment Act. The concept of what is “substantially related” is informed by case law. This delegation permits Department attorneys to independently conduct conviction reviews and efficiently approve applications if convictions are not substantially related to the practice of the profession. Applications that contain conviction records that may be substantially related to the practice of a profession will still be submitted to the Credentialing Liaison for input.

Delegation to DSPTS When Applicant's Disciplinary History Has Been Previously Reviewed

MOTION EXAMPLE: to delegate authority to Department staff to approve applications where Applicant's prior discipline has been approved for a previous credential and there is no new discipline.

PURPOSE: Some Boards offer progressive levels of credentials. This delegation eliminates the need for a re-review of discipline that has already been considered and approved by the Board/Section/Liaison for a lower-level credential.

Delegation to DSPTS When Applicant's Conviction History Has Been Previously Reviewed

MOTION EXAMPLE: to delegate authority to Department staff to approve applications where criminal background checks have been approved for a previous credential and there is no new conviction record.

PURPOSE: Some Boards offer progressive levels of credentials. This delegation eliminates the need for a re-review of conviction history that has already been reviewed and approved for a lower-level credential.

Delegation of Authority for Reciprocity Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve reciprocity applications in which the out-of-state license requirements meet Wisconsin license requirements. (Specific legal standards are referenced in the motion depending on credential/profession type.)

PURPOSE: Applications via reciprocity or endorsement require comparison of Wisconsin licensing requirements to the licensing requirements of another jurisdiction. These reviews consider the legal standard for reciprocity, which varies by profession, as well as the specified legal requirements to obtain licensure in the profession. This delegation permits Department attorneys to independently conduct reciprocity reviews and efficiently approve applications if legal standards and requirements are met for licensure. Applications for which reciprocity may not be available will still be submitted to the Credentialing Liaison for input.

Delegation of Authority for Military Reciprocity Reviews

MOTION EXAMPLE: to delegate authority to the Department attorneys to review and approve military reciprocity applications in which the individual meets the requirements of Wis. Stat. § 440.09.

PURPOSE: The law permits service members, former service members, and their spouses to be licensed if they hold licensure in other jurisdictions that qualify them to perform acts authorized by the credential they are seeking in Wisconsin. This is a shortened path to licensure that does not require meeting the specific requirements/standards for licensure/reciprocity in a profession. By law, the Department/Board must expedite the issuance of a reciprocal license via military

reciprocity. This delegation permits Department attorneys to independently conduct military reciprocity reviews and efficiently approve applications if legal standards and requirements are met for licensure. Applications for which reciprocity may not be available will still be submitted to the Credentialing Liaison for input.

Delegation of Authority for Application Denial Reviews

MOTION EXAMPLE: to delegate authority to the Department's attorney supervisors to serve as the Board designee for purposes of reviewing and acting on requests for hearing as a result of a denial of a credential.

PURPOSE: When an application is denied, the applicant has a legal right to appeal the denial determination. Applicants must meet a specified legal standard in order to have an appeal granted. Additionally, Wisconsin law sets specific time frames for appeal decisions. This delegation permits Department attorney supervisors to independently review and efficiently act on requests for hearing as a result of a denial of a credential.

Delegation to Department Attorneys to Approve Duplicate Legal Issue

MOTION EXAMPLE: to delegate authority to Department attorneys to approve a legal matter in connection with a renewal application when that same/similar matter was already addressed by the Board and there are no new legal issues for that credential holder.

PURPOSE: The intent of this delegation is to be able to approve prior discipline by the Board for the renewal applicant. This delegation eliminates the need for a re-review of discipline that has already been considered and approved by the Board/Section/Liaison.

Delegation to Department Attorneys to Approve Prior Discipline

MOTION EXAMPLE: to delegate authority to Department attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or older, and the previously disciplined credential is currently in good standing.

PURPOSE: In order to continue improving processing application legal reviews in a timely matter, this delegation gives Department attorneys authority to approve prior professional discipline which meets all of the following criteria: (1) it is at least ten years old; (2) it resulted in a monetary penalty, remedial education, and/or reprimand; and (3) the previously disciplined credential is currently in good standing.

MONITORING DELEGATIONS

The overall purpose of monitoring delegations is to be able to enforce the Boards orders and limited licenses as efficiently and effectively as possible. Monitoring delegations have two categories: delegations to the Monitoring Liaison and delegations to the Department Monitor.

Delegation of Authority to Department Monitor

MOTION EXAMPLE: to delegate authority to the Department Monitor:

- a. to grant full reinstatement of licensure if education is the only limitation and credential holder has submitted the required proof of course completion.
- b. to suspend the credential if the credential holder has not completed Board ordered education, paid costs, paid forfeitures, within the time specified by the Board Order.
- c. to lift a suspension when compliance with education and costs provisions have been met.

PURPOSE: These delegations allow for the Department Monitor to automatically act on requests when certain criteria are met or not met without needing to burden the Monitoring Liaison. The Board can set their own criteria for what actions they would like to be handled by the Department, the Monitoring Liaison, and the full Board.

Delegation of Authority to Monitoring Liaison

MOTION EXAMPLE: to delegate authority to the Monitoring Liaison to approve or deny all requests received from the credential holder.

PURPOSE: These delegations allow the Board to set criteria for what decisions can be made by the Board member(s) serving as the Monitoring Liaison and what matters should be decided by the full Board.

Education and Examination Delegations

MOTION EXAMPLE: to delegate authority to the Education and Examination Liaison(s) to address all issues related to qualifying education, continuing education and examinations. Motion carried unanimously. (Differs by Board.)

PURPOSE: Some Boards are responsible for approving qualifying educational programs or continuing education courses. A delegation is executed in order for an Education and Examination Liaison to make these determinations on behalf of the Board and with assistance of the Department. Additionally, some Boards review examinations and individual scores to qualify for a credential.

MISCELLANEOUS DELEGATIONS

Document Signature

MOTION EXAMPLE: to delegate authority to the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to sign documents on behalf of the Board in order to carry out its duties. Motion carried unanimously.

MOTION EXAMPLE: in order to carry out duties of the Board, the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) has the ability to delegate signature authority for purposes of facilitating the completion of assignments during or between meetings. The members of the Board hereby delegate to the

Executive Director, Board Counsel, or DPD Division Administrator, the authority to sign on behalf of a Board member as necessary. Motion carried unanimously.

PURPOSE: To take the action approved at Board meetings, the Department may need to draft correspondence and/or Orders after the meetings have adjourned. These actions then need to be signed by a Board Member. This interaction usually takes place over email and a Board member can authorize the use of their signature that is kept on file.

Urgent Matters

MOTION EXAMPLE: in order to facilitate the completion of urgent matters between meetings, the Board delegates its authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to appoint liaisons to the Department to act in urgent matters. Motion carried unanimously.

PURPOSE: Allows for quick responses to urgent matters that may need Board approval or for which the Department requires guidance from the Board.

Delegation to Chief Legal Counsel-Due to Loss of Quorum

MOTION EXAMPLE: to delegate the review and authority to act on disciplinary cases to the Department's Chief Legal Counsel due to lack of/loss of quorum after two consecutive meetings. Motion carried unanimously.

PURPOSE: Sometimes Boards can struggle to meet quorum necessary to conduct business. This happens for a multitude of reasons, but this delegation allows for the Boards to have disciplinary cases decided by Chief Legal Counsel if the Board fails to meet quorum for two consecutive meetings.

Delegation to Chief Legal Counsel-Stipulated Resolutions

MOTION EXAMPLE: to delegate to the Department's Chief Legal Counsel the authority to act on behalf of the Board concerning stipulated resolutions providing for a surrender, suspension, or revocation of a credential, where the underlying merits involve serious and dangerous behavior, and where the signed stipulation is received between Board meetings. The Board further requests that Chief Legal Counsel only act on such matters when the best interests of the Board, Department, and the Public are best served by acting upon the stipulated resolution at the time the signed stipulation is received versus waiting for the next Board meeting. Motion carried unanimously.

PURPOSE: For matters of public safety, it may be necessary to take immediate action on a stipulated agreement rather than allowing a credential holder to continue practicing unencumbered until the next scheduled meeting. This delegation allows Chief Legal Counsel to act on behalf of the Board when there is a stipulated agreement. A stipulated agreement is an agreement to which all relevant parties have consented to the terms.

Voluntary Surrenders

MOTION EXAMPLE: to delegate authority to the assigned case advisor to accept or refuse a request for voluntary surrender pursuant to Wis. Stat. § 440.19 for a credential holder who has a pending complaint or disciplinary matter.

MOTION EXAMPLE: to delegate authority to the Department to accept the voluntary surrender of a credential when there is no pending complaint or disciplinary matter with the Department pursuant to Wis. Stat. § 440.19.

PURPOSE: Credential holders can ask the Boards to accept surrender of their credentials at any time. These delegations are in place for the different situations that arise from those requests. If a credential holder is seeking to surrender their credential because they wish to leave the profession, that can be processed with this delegation by the Department if they have no pending disciplinary complaints. If the credential holder wishes to surrender while they have a pending disciplinary complaint, that request is reviewed by the individual Board member assigned to the case.

DLSC Pre-screening

MOTION EXAMPLE: to delegate pre-screening decision making authority to the DSPS screening attorney for opening cases where the credential holder has failed to respond to allegations contained in the complaint when requested by intake (case will be opened on failure to respond and the merits of the complaint).

PURPOSE: Pre-screening delegations exist so the Board can define specific parameters where the Department can review disciplinary complaints and open those cases if they meet certain criteria. Boards also have the authority to set certain criteria that would allow the Department to review and close a case if the criteria is met.

Delegation to Handle Administrative Rule Matters

MOTION EXAMPLE: to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

PURPOSE: In order to advance the administrative rules process, action may need to occur between meetings. This allows for quick responses to urgent matters that may need Board approval or for which the Department requires guidance from the Board.

**PHARMACY EXAMINING BOARD
FEBRUARY 20, 2025
2025 DELEGATIONS**

New Delegations for 2025

Pre-Screening Delegation to Open Cases, Amended

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate pre-screening decision making authority to the Department screening attorney for opening cases as outlined below:

1. OWIs of 3 or more that occurred in the last 5 years.
2. Reciprocal discipline cases.
3. Impairment and/or diversion at work that includes a positive drug/alcohol test or admission by respondent.
4. Conviction of a misdemeanor or felony that the attorney believes is substantially related and is not otherwise excluded from consideration via Wis. Stat. ch. 111.
5. No response from the respondent after intake requested a response (case would be opened for the failure to respond issue as well as the merits).
6. Out of state discipline cases that have not been previously reported and/or investigated.

Motion carried unanimously.

Liaison Update

MOTION: Susan Kleppin moved, seconded by Michael Walsh, to remove the designation of the Phar 7.08(8) Approval Request Liaison to serve as the liaison for review of Phar 7.08(8) approval requests. Motion carried unanimously.

Delegation to Department Monitor

MOTION: John Weitekamp moved, seconded by Michael Walsh, to delegate authority to the Department Monitor as outlined below:

1. to grant reinstatement of licensure if education and/or costs are the sole condition of the order and the credential holder has submitted the required proof of completion for approved courses and paid the costs.
2. to suspend the license if the credential holder has not completed Board ordered education and/or paid costs and forfeitures within the time specified by the Board order. The Department Monitor may remove the suspension and issue an order when proof of completion and/or payment has been received.

3. to suspend the license (or remove stay of suspension) if a credential holder fails to enroll and participate in an Approved Program for drug and alcohol testing within 30 days of the order, or if credential holder ceases participation in the Approved Program without Board approval. This delegated authority only pertains to respondents who must comply with drug and/or alcohol testing requirements.
4. to grant or deny approval when a credential holder proposes treatment providers, mentors, and supervisors unless the Order specifically requires full-Board or Board designee approval.
5. to grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete Board ordered continuing, disciplinary, or remedial education.
6. to grant a maximum of one 90-day extension or payment plan for proceeding costs and/or forfeitures if warranted and requested in writing by a credential holder.
7. to grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete a Board ordered evaluation or exam.

Motion carried unanimously.

Delegation to Department Attorneys to Approve Prior Discipline

MOTION: Christa Wilson moved, seconded by Anthony Peterangelo, to delegate authority to Department Attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or older, and the previously disciplined credential is currently in good standing. Motion carried unanimously.

Delegation to Handle Administrative Rule Matters

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

Review and Approval of 2024 Delegations including new modifications

MOTION: Susan Kleppin moved, seconded by Tiffany O'Hagan, to reaffirm all delegation motions made in 2024, as reflected in the February 20, 2025 agenda materials, which were not otherwise modified or amended during the February 20, 2025 meeting. Motion carried unanimously.

Pre-Screening Delegation to Open Cases for Out of State Pharmacies

MOTION: John Weitekamp moved, seconded by Michael Walsh, to delegate pre-screening decision making authority to the Department screening attorney to open out-of-state pharmacy cases to investigate whether a nexus to Wisconsin exists. Motion carried unanimously.

All Combined Delegations for 2025

Review and Approval of 2024 Delegations including new modifications

MOTION: Susan Kleppin moved, seconded by Tiffany O’Hagan, to reaffirm all delegation motions made in 2024, as reflected in the February 20, 2025 agenda materials, which were not otherwise modified or amended during the February 20, 2025 meeting. Motion carried unanimously.

Document Signature Delegations

MOTION: Michael Walsh moved, seconded by Tiffany O’Hagan, to delegate authority to the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to sign documents on behalf of the Board in order to carry out its duties. Motion carried unanimously.

MOTION: Michael Walsh moved, seconded by Susan Kleppin, in order to carry out duties of the Board, the Chairperson (or in absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) has the ability to delegate signature authority for purposes of facilitating the completion of assignments during or between meetings. The members of the Board hereby delegate to the Executive Director, Board Counsel or DPD Division Administrator, the authority to sign on behalf of a board member as necessary. Motion carried unanimously.

Delegated Authority for Urgent Matters

MOTION: Anthony Peterangelo moved, seconded by Tiffany O’Hagan, that in order to facilitate the completion of urgent matters between meetings, the Board delegates its authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession), to appoint liaisons to the Department to act in urgent matters. Motion carried unanimously.

Delegation to Chief Legal Counsel Due to Loss of Quorum

MOTION: Michael Walsh moved, seconded by Anthony Peterangelo, to delegate the review and authority to act on disciplinary cases to the Department’s Chief

Legal Counsel due to lack of/loss of quorum after two consecutive meetings. Motion carried unanimously.

Delegation to Chief Legal Counsel for Stipulated Resolutions

MOTION: Michael Walsh moved, seconded by Anthony Peterangelo, to delegate to DSPS Chief Legal Counsel the authority to act on behalf of the Board concerning stipulated resolutions providing for a surrender, suspension, or revocation of a credential, where the underlying merits involve serious and dangerous behavior, and where the signed stipulation is received between Board meetings. The Board further requests that CLC only act on such matters when the best interests of the Board, Department and the Public are best served by acting upon the stipulated resolution at the time the signed stipulation is received versus waiting for the next Board meeting. Motion carried unanimously.

Monitoring Delegations

Delegation of Authorities for Legal Counsel to Sign Monitoring Orders

MOTION: Susan Kleppin moved, seconded by Anthony Peterangelo, to delegate to Legal Counsel the authority to sign Monitoring orders that result from Board meetings on behalf of the Board Chairperson. Motion carried unanimously.

Delegation to Monitoring Liaison

MOTION: Michael Walsch moved, seconded by Christa Wilson, to delegate authority to the Monitoring Liaison(s) to make any determination on Orders under monitoring and to refer to the Full Board any matter the monitoring Liaison deems appropriate. Motion carried unanimously.

Delegation to Department Monitor

MOTION: John Weitekamp moved, seconded by Michael Walsh, to delegate authority to the Department Monitor as outlined below:

1. to grant reinstatement of licensure if education and/or costs are the sole condition of the order and the credential holder has submitted the required proof of completion for approved courses and paid the costs.
2. to suspend the license if the credential holder has not completed Board ordered education and/or paid costs and forfeitures within the time specified by the Board order. The Department Monitor may remove the suspension and issue an order when proof of completion and/or payment has been received.
3. to suspend the license (or remove stay of suspension) if a credential holder fails to enroll and participate in an Approved Program for drug and alcohol testing within 30 days of the order, or if credential

holder ceases participation in the Approved Program without Board approval. This delegated authority only pertains to respondents who must comply with drug and/or alcohol testing requirements.

4. to grant or deny approval when a credential holder proposes treatment providers, mentors, and supervisors unless the Order specifically requires full-Board or Board designee approval.
5. to grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete Board ordered continuing, disciplinary, or remedial education.
6. to grant a maximum of one 90-day extension or payment plan for proceeding costs and/or forfeitures if warranted and requested in writing by a credential holder.
7. to grant a maximum of one 90-day extension, if warranted and requested in writing by a credential holder, to complete a Board ordered evaluation or exam.

Motion carried unanimously.

Credentialing Authority Delegations

Delegation of Authority to Credentialing Liaison

MOTION: Michael Walsh moved, seconded by Tiffany O'Hagan, to delegate authority to the Credentialing Liaison(s) to serve as a liaison between the Department and the Board and to act on behalf of the Board in regard to credentialing applications or questions presented to them, including the signing of documents related to applications. Motion carried unanimously.

Delegation of Authority to DSPS When Credentialing Criteria is Met

MOTION: Susan Kleppin moved, seconded by Michael Walsh, to delegate credentialing authority to the Department to act upon applications that meet all credentialing statutory and regulatory requirements without Board or Board liaison review. Motion carried unanimously.

Delegation of Authority for Predetermination Reviews

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate authority to the Department Attorneys to make decisions regarding predetermination applications pursuant to Wis. Stat. § 111.335(4)(f). Motion carried unanimously.

Delegation to Department Attorneys to Approve Prior Discipline

MOTION: Christa Wilson moved, seconded by Anthony Peterangelo, to delegate authority to Department Attorneys to approve an applicant's prior professional discipline which resulted in a forfeiture/fine/other monetary penalty, remedial education, and/or reprimand, that is 10 years old or

older, and the previously disciplined credential is currently in good standing. Motion carried unanimously.

Delegation of Authority for Conviction Reviews

MOTION: Christa Wilson moved, seconded by Anthony Peterangelo, to delegate authority to Department Attorneys to review and approve applications with municipal/ordinance violations and misdemeanors which are not substantially related to the practice of pharmacy. Motion carried unanimously.

Delegation to DSPS When Applicant's Discipline History Has Been Previously Reviewed

MOTION: Michael Walsh moved, seconded by Susan Kleppin, to delegate authority to Department staff to approve applications where Applicant's prior discipline has been approved for a previous pharmacy credential and there is no new discipline. Motion carried unanimously.

Delegation to DSPS When Applicant's Conviction History Has Been Previously Reviewed

MOTION: Susan Kleppin moved, seconded by Anthony Peterangelo, to delegate authority to Department staff to approve applications where criminal background checks have been approved for a previous pharmacy credential and there is no new conviction record. Motion carried unanimously.

Delegation of Authority for Reciprocity/Endorsement Reviews

MOTION: Susan Kleppin moved, seconded by Anthony Peterangelo, to delegate authority to the Department Attorneys to review and approve reciprocity/endorsement applications in which the applicant met requirements comparable to those that existed in this state at the time the person became licensed in the other state. Motion carried unanimously.

Delegation of Authority for Military Reciprocity Reviews

MOTION: Susan Kleppin moved, seconded by Michael Walsh, to delegate authority to the Department Attorneys to review and approve military reciprocity applications in which the individual meets the requirements of Wis. Stat. § 440.09. Motion carried unanimously.

Delegated Authority for Application Denial Reviews

MOTION: Michael Walsh moved, seconded by Anthony Peterangelo, to delegate authority to the Department's Attorney Supervisors to serve as the Board's designee for purposes of reviewing and acting on requests for hearing as a result of a denial of a credential. Motion carried unanimously.

Pre-Screening Delegation to Open Cases

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate pre-screening decision making authority to the Department screening attorney for opening cases as outlined below:

1. OWIs of 3 or more that occurred in the last 5 years.
2. Reciprocal discipline cases.
3. Impairment and/or diversion at work that includes a positive drug/alcohol test or admission by respondent.
4. Conviction of a misdemeanor or felony that the attorney believes is substantially related and is not otherwise excluded from consideration via Wis. Stat. ch. 111.
5. No response from the respondent after intake requested a response (case would be opened for the failure to respond issue as well as the merits).
6. Out of state discipline cases that have not been previously reported and/or investigated.

Motion carried unanimously.

Pre-Screening Delegation to Close Cases

MOTION: Anthony Peterangelo moved, seconded by Michael Walsh, to delegate pre-screening decision making authority to the Department screening attorney for closing cases as outlined below:

1. One OWI that is non-work related and if AODA assessment completed, assessment does not indicate dependency.
2. Complaints that even if allegations are true, do not amount to a violation of law or rules.
3. To close at prescreening complaints that the Board has already reviewed and acted upon that are the result of multiple-state discipline based on original violations.

Motion carried unanimously.

Pre-Screening Delegation to Open Cases for Out of State Pharmacies

MOTION: John Weitekamp moved, seconded by Michael Walsh, to delegate pre-screening decision making authority to the Department screening attorney to open out-of-state pharmacy cases to investigate whether a nexus to Wisconsin exists. Motion carried unanimously.

Delegation to Department Attorneys to Approve Duplicate Legal Issue

MOTION: Michael Walsh moved, seconded by Susan Kleppin, to delegate authority to Department Attorneys to approve a legal matter in connection with a

renewal application when that same/similar matter was already addressed by the Board and there are no new legal issues. Motion carried unanimously.

Voluntary Surrenders

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate authority to the assigned case advisor to accept or refuse a request for voluntary surrender pursuant to Wis. Stat. § 440.19 for a credential holder who has a pending complaint or disciplinary matter. Motion carried unanimously.

MOTION: Anthony Peterangelo moved, seconded by Michael Walsh, to delegate authority to the Department to accept the voluntary surrender of a credential when there is no pending complaint or disciplinary matter with the Department pursuant to Wis. Stat. § 440.19. Motion carried unanimously.

Education and Examination Liaison(s) Delegation

MOTION: Christa Wilson moved, seconded by Michael Walsh, to delegate authority to the Education and Examination Liaison(s) to address all issues related to continuing education, and examinations. Motion carried unanimously.

Pilot Program Liaison(s) Delegation

MOTION: Christa Wilson moved, seconded by Anthony Peterangelo, to delegate authority to the Pilot Program Liaison(s) to address all issues related to pilot program matters. Motion carried unanimously.

Authorization for DSPS to Provide Board Member Contact Information to National Regulatory Related Bodies

MOTION: Michael Walsh moved, seconded by Christa Wilson, to authorize the Department staff to provide national regulatory related bodies with all board member contact information that the Department retains on file. Motion carried unanimously.

Optional Renewal Notice Insert Delegation

MOTION: Christa Wilson moved, seconded by Michael Walsh, to designate the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to provide a brief statement or link relating to board-related business within the license renewal notice at the Board's or Board designee's request. Motion carried unanimously.

Rules Committee Delegation

MOTION: Susan Kleppin moved, seconded by Christa Wilson, to grant the Rules Committee the ability to address all rulemaking as related to drafting and making recommendations to the full Board. Motion carried unanimously.

Committee Membership Delegation

MOTION: Tiffany O'Hagan moved, seconded by Christa Wilson, that in order to facilitate the completion of its duties between meetings, the Board delegates authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving board member in that succession) to appoint members to its committees between meetings as necessary. Motion carried unanimously.

Legislative Liaison Delegation

MOTION: Michael Walsh moved, seconded by Susan Kleppin, to delegate authority to the Legislative Liaisons to speak on behalf of the Board regarding legislative matters. Motion carried unanimously.

Travel Authorization Liaison Delegation

MOTION: Christa Wilson moved, seconded by Tiffany O'Hagan, to delegate authority to the Travel Authorization Liaison to approve any board member travel to and/or participation in events germane to the board, and to designate representatives from the Board to speak and/or act on the Board's behalf at such events. Motion carried unanimously.

Newsletter Liaison(s) Delegation

MOTION: Michael Walsh moved, seconded by Anthony Peterangelo, to delegate authority to the newsletter liaison(s) to handle all matters relating to newsletters. Motion carried unanimously.

Website Liaison(s) Delegation

MOTION: Susan Kleppin moved, seconded by Christa Wilson, to authorize to the Website Liaison(s) to act on behalf of the Board in working with Department staff to identify and execute website updates. Motion carried unanimously.

SCAODA Representative Delegation

MOTION: Anthony Peterangelo moved, seconded by Christa Wilson, to authorize the SCAODA representative to vote on behalf of the Board at the State Council on Alcohol and Other Drug Abuse meetings. Motion carried unanimously.

Variance Liaison(s) Delegation

MOTION: Michael Walsh moved, seconded by Anthony Peterangelo, to delegate to the Variance Liaison(s) the Board's authority to approve, rescind, and modify variances under §450.02(3m). Motion carried unanimously.

Improving Pharmacist Workplace Satisfaction Delegation

MOTION: John Weitekamp moved, seconded by Tiffany O'Hagan, to designate Anthony Peterangelo to work with DSPS to identify topics of consideration and discussion related to improving pharmacist workplace satisfaction by the Pharmacy Examining Board. Motion carried unanimously.

Inspection Liaison(s) Delegation

MOTION: Michael Walsh moved, seconded by Tiffany O'Hagan, to designate the Inspection Liaison(s) to address all issues related to the inspection of credentialed facilities. Motion carried unanimously.

Interdisciplinary Advisory Committee Liaison

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate authority to the Interdisciplinary Advisory Council liaison to speak and take action on behalf of the Pharmacy Examining Board in matters considered by the Council, and to report back to the Pharmacy Examining Board on any actions taken by the Council. Motion carried unanimously.

Delegation to Handle Administrative Rule Matters

MOTION: Michael Walsh moved, seconded by Christa Wilson, to delegate authority to the Chairperson (or, in the absence of the Chairperson, the highest-ranking officer or longest serving Board member in that succession), to act on behalf of the Board regarding administrative rule matters between meetings. Motion carried unanimously.

Review and Approval of 2025 Delegations including new modifications

MOTION: [Board member name] moved, seconded by [Board member name], to reaffirm all delegation motions made in 2025, as reflected in the February 26, 2026 agenda materials, which were not otherwise modified or amended during the February 26, 2026 meeting. Motion carried [].

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

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Nilajah Hardin Administrative Rules Coordinator		2) Date when request submitted: 2/16/26 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
3) Name of Board, Committee, Council, Sections: Pharmacy Examining Board			
4) Meeting Date: 2/26/26	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? 11:00 A.M. Public Hearing for Emergency Rule 2601 and Clearinghouse Rule 26-013 on Phar 1, 6, 7, and 10, Relating to Pharmacy Workplace Conditions 1. Review Public Hearing Comments and Respond to Clearinghouse Report	
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: N/A	
10) Describe the issue and action that should be addressed: The Board will hold a public hearing on this rule as required by the rulemaking process.			
11) Authorization			
 Signature of person making this request		2/16/26 Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
Directions for including supporting documents: 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.			

STATE OF WISCONSIN
PHARMACY EXAMINING BOARD

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

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 December 5, 2025.

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.

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.

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 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, 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.

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.

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.

(END OF TEXT OF RULE)

Dated 10/21/2025

Agency *John Witekamp*

Chairperson
Pharmacy Examining Board

STATE OF WISCONSIN
PHARMACY EXAMINING BOARD

IN THE MATTER OF RULEMAKING	:	PROPOSED ORDER OF THE
PROCEEDINGS BEFORE THE	:	PHARMACY EXAMINING BOARD
PHARMACY EXAMINING BOARD	:	ADOPTING RULES
	:	(CLEARINGHOUSE RULE)

PROPOSED ORDER

An order of the Pharmacy Examining Board to amend Phar 10.03 (2), (6), (7), (8), (13), (17), and (18) and create Phar 6.09 and 10.03 (22) to (25), relating to Pharmacy Workplace Conditions.

Analysis prepared by the Department of Safety and Professional Services.

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.”

Section 450.02 (5), Stats., states “[t]he Board may promulgate rules governing pharmacies that are operated as remote dispensing sites.”

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 as unprofessional conduct for the pharmacy license. Phar 10.03 (6), (7), and (8) were amended to utilize the existing definition of “Board” from Phar 1.02 (1). Phar 10.03 (18) was updated to apply to any order of the board, instead of just formal disciplinary orders. Phar 10.03 (22) to (25) were created to include that violating any federal, state, or municipal law; failing to provide adequate supervision; failing to cooperate with a board investigation; and engaging in the practice of pharmacy while impaired are considered unprofessional conduct.

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

Summary of public comments received on statement of scope and a description of how and to what extent those comments and feedback were taken into account in drafting the proposed rule:

The Pharmacy Examining Board held a public hearing on February 20, 2025, on Scope Statement 002-25. The following people either testified at the hearing, or submitted written comments:

- Rachel Ver Velde, Associate Vice President of Government Relations and Senior Political Advisor, Wisconsin Manufacturers & Commerce (WMC)

The Pharmacy Examining Board summarizes the comments received either by hearing testimony or by written submission as follows:

- WMC commented that there is a lack of information in the statement of scope regarding the description of existing policies relevant to the rule, new policies proposed, and analysis of policy alternatives. The WMC further commented that this lack of information meant that their members could not comment on the scope statement.

The Pharmacy Examining Board did not make any modifications to Scope Statement 002-25 based on public comment.

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.

Analysis and supporting documents used to determine effect on small business or in preparation of economic impact analysis:

The rule was posted for 14 days on the Department of Safety and Professional Services' website to solicit economic impact comments, including how the proposed rules may affect businesses, local municipalities, and private citizens. No comments were received.

Fiscal Estimate and Economic Impact Analysis:

The Fiscal Estimate and Economic Impact Analysis is attached.

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, or by calling (608) 266-2112.

Agency contact person:

Nilajah Hardin, Administrative Rules Coordinator, Department of Safety and Professional Services, Office of Chief Legal Counsel, P.O. Box 14497, Madison, Wisconsin 53708-0497; 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, Office of Chief Legal Counsel, P.O. Box 14497, Madison, Wisconsin 53708-0497, or by email to DSPSAdminRules@wisconsin.gov. Comments must be received on or before the public hearing, held February 26, 2026, to be included in the record of rule-making proceedings.

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.

SECTION 2. Phar 10.03 (2), (6), (7), (8), (13), (17), and (18) 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.

(6) Disclosing to the public information concerning a patient without the consent of the patient unless the information is requested by the ~~pharmacy-examining~~ board or the department of safety and professional services or unless release is otherwise authorized by law.

(7) Failing to report to the ~~pharmacy-examining~~ board any pharmacy practice which constitutes a danger to the health, safety or welfare of patient or public.

(8) Providing false information to the ~~pharmacy-examining~~ board or its agent.

(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 ~~pharmacist license or pharmacy technician registration~~ credential granted by the board revoked or suspended in another state or United States jurisdiction or having been subject to other disciplinary action by the licensing authority thereof.

(18) Violating or attempting to violate any ~~formal-disciplinary~~ order of the board.

SECTION 3. Phar 10.03 (22) to (25) are created to read:

Phar 10.03 (22) Violating any federal, state, or municipal law which substantially relates to the practice of the licensee or registrant, or having a civil judgment entered against you which civil judgment substantially relates to the practice of the licensee or registrant.

(23) Failure to provide competent supervision to a subordinate, which subordinate is credentialed by the board.

(24) After a request by the board, failing to cooperate in a timely manner with the board's investigation of a complaint filed against a credential holder. There is a rebuttable presumption that a credential holder who takes longer than 30 days to respond to a request of the board has not acted in a timely manner.

(25) Engaging or attempting to engage in the practice of pharmacy or practice of a pharmacy technician while the person's ability to practice is impaired by alcohol or

other drugs, or as a result of an illness which impairs the credential holder's ability to appropriately carry out the functions delineated under the credential in a manner consistent with the safety of a client, patient, or the public.

SECTION 4. EFFECTIVE DATE. The rules adopted in this order shall take effect on the first day of the month following publication in the Wisconsin Administrative Register, pursuant to s. 227.22 (2) (intro.), Stats.

(END OF TEXT OF RULE)



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE REPORT TO AGENCY

[THIS REPORT HAS BEEN PREPARED PURSUANT TO S. 227.15, STATS. THIS IS A REPORT ON A RULE AS ORIGINALLY PROPOSED BY THE AGENCY; THE REPORT MAY NOT REFLECT THE FINAL CONTENT OF THE RULE IN FINAL DRAFT FORM AS IT WILL BE SUBMITTED TO THE LEGISLATURE. THIS REPORT CONSTITUTES A REVIEW OF, BUT NOT APPROVAL OR DISAPPROVAL OF, THE SUBSTANTIVE CONTENT AND TECHNICAL ACCURACY OF THE RULE.]

CLEARINGHOUSE RULE **26-013**

AN ORDER to amend Phar 10.03 (2), (6), (7), (8), (13), (17), and (18); and to create Phar 6.09 and 10.03 (22) to (25), relating to pharmacy workplace conditions.

Submitted by **PHARMACY EXAMINING BOARD**

01-20-2026 RECEIVED BY LEGISLATIVE COUNCIL.

02-11-2026 REPORT SENT TO AGENCY.

SG:PW

LEGISLATIVE COUNCIL RULES CLEARINGHOUSE REPORT

This rule has been reviewed by the Rules Clearinghouse. Based on that review, comments are reported as noted below:

1. STATUTORY AUTHORITY [s. 227.15 (2) (a)]
Comment Attached YES NO
2. FORM, STYLE AND PLACEMENT IN ADMINISTRATIVE CODE [s. 227.15 (2) (c)]
Comment Attached YES NO
3. CONFLICT WITH OR DUPLICATION OF EXISTING RULES [s. 227.15 (2) (d)]
Comment Attached YES NO
4. ADEQUACY OF REFERENCES TO RELATED STATUTES, RULES AND FORMS
[s. 227.15 (2) (e)]
Comment Attached YES NO
5. CLARITY, GRAMMAR, PUNCTUATION AND USE OF PLAIN LANGUAGE [s. 227.15 (2) (f)]
Comment Attached YES NO
6. POTENTIAL CONFLICTS WITH, AND COMPARABILITY TO, RELATED FEDERAL
REGULATIONS [s. 227.15 (2) (g)]
Comment Attached YES NO
7. COMPLIANCE WITH PERMIT ACTION DEADLINE REQUIREMENTS [s. 227.15 (2) (h)]
Comment Attached YES NO



Wisconsin Legislative Council

RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Anne Sappenfield
Legislative Council Director

Margit Kelley
Clearinghouse Assistant Director

CLEARINGHOUSE RULE 26-013

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Council Staff and the Legislative Reference Bureau, dated November 2020.]

1. Statutory Authority

In the “Statutes interpreted” section of the rule analysis, consider adding s. 450.02 (3) (b), Stats. It seems that if this provision is used as agency authority, then it likely is also being interpreted.

2. Form, Style and Placement in Administrative Code

In s. Phar 6.09, consider amending subs. (1) and (2) to match the style of subs. (3) to (5).

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. In the “Plain language analysis” section of the rule analysis, consider explaining the contents of s. Phar 10.03 (2), (13), and (17) so that the reader can understand what now applies to the pharmacy license. Also, consider indicating that these standards currently apply to the pharmacist and pharmacist technician license. Similarly, explain the contents of s. Phar 10.03 (18).

b. In s. Phar 6.09 (1), (3), and (4), consider replacing the terms “appropriate”, “enough time”, and “sufficiently” with more precise language. [s. 1.08 (1) (k), Manual.]

c. In s. Phar 6.09 (5), consider amending “pharmacy practice” to “the practice of pharmacy”, which is a defined term.

d. In s. Phar 10.03 (23), consider changing the “which” clause to “who is credentialed by the board”. [s. 1.08 (1) (c), Manual.] This revision would clarify that the unprofessional conduct relates to failing to provide competent supervision to a subordinate only when that subordinate is credentialed by the board. If this is not the intended meaning, revise to make the intended meaning clear.

**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: 2/16/2026 <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: Pharmacy Examining Board			
4) Meeting Date: 2/26/2026	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Legislative and Policy Matters – Discussion and Consideration 1) 2025 WI Senate Bill 832 / 2025 WI Assembly Bill 842 2) 2025 WI Senate Bill 898 / 2025 WI Assembly Bill 899	
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 <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:			
11) Authorization			
 Signature of person making this request		2/16/2026 Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents:			
1. This form should be saved with any other documents submitted to the Agenda Items 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.			



2025 SENATE BILL 832

January 15, 2026 - Introduced by Senator JAMES, cosponsored by Representatives VANDERMEER, ARMSTRONG, DITTRICH, GOEBEN, GREEN, GUNDRUM, KRUG, MURPHY and KNODL. Referred to Committee on Health.

1 **AN ACT to repeal** 450.09 (2) (b) 1. a. to d.; **to renumber** 450.09 (2) (b) 2. b.; **to**
2 **renumber and amend** 450.09 (2) (b) 2. a.; **to consolidate, renumber and**
3 **amend** 450.09 (2) (b) 1. (intro.) and 2. (intro.); **to amend** 450.01 (21c), 450.02
4 (5) and 450.09 (1) (a) of the statutes; **relating to:** remote dispensing sites
5 under the pharmacy practice law.

Analysis by the Legislative Reference Bureau

Under current law, pharmacies at certain locations, including health care facilities, health care practitioners' offices, correctional facilities such as jails and state prisons, and juvenile justice facilities, may be operated as remote dispensing sites, in which case a pharmacist is not required to be present at the pharmacy but must supervise it remotely. Current law allows the Pharmacy Examining Board to promulgate rules governing pharmacies operated as remote dispensing sites, which may exempt pharmacies operated as remote dispensing sites at these locations from rules that apply to other pharmacies.

This bill eliminates the restrictions on the facilities at which pharmacies may be operated as remote dispensing sites and instead refers to them as remotely supervised pharmacies, thereby allowing any pharmacy to be operated as a remotely supervised pharmacy if the pharmacist complies with the board's rules.

SENATE BILL 832**SECTION 1**

The people of the state of Wisconsin, represented in senate and assembly, do enact as follows:

1 **SECTION 1.** 450.01 (21c) of the statutes is amended to read:

2 450.01 **(21c)** ~~“Remote dispensing site”~~ “Remotely supervised pharmacy”
3 means a pharmacy governed by s. 450.09 (2) (b) 2.

4 **SECTION 2.** 450.02 (5) of the statutes is amended to read:

5 450.02 **(5)** The board may promulgate rules governing pharmacies that are
6 operated as ~~remote dispensing sites~~ remotely supervised pharmacies. Rules
7 promulgated under this subsection may exempt pharmacies operated as ~~remote~~
8 ~~dispensing sites~~ remotely supervised pharmacies from requirements governing
9 pharmacies that are not operated as ~~remote dispensing sites~~ remotely supervised
10 pharmacies.

11 **SECTION 3.** 450.09 (1) (a) of the statutes is amended to read:

12 450.09 **(1)** (a) Every pharmacy shall be under the control of the managing
13 pharmacist who signed the pharmacy license application, the most recent license
14 renewal application or the most recent amended schedule of operations. The
15 managing pharmacist shall be responsible for the professional operations of the
16 pharmacy. A pharmacist may be the managing pharmacist of not more than one
17 community and one institutional pharmacy at any time and shall be engaged in the
18 practice of pharmacy at each location he or she supervises. The board shall by rule
19 define community pharmacy and institutional pharmacy for the purposes of this
20 section, but a pharmacy that is operated exclusively as a ~~remote dispensing site~~
21 remotely supervised pharmacy shall not be considered a community pharmacy or
22 institutional pharmacy for the purposes of this paragraph.



January 29th, 2026

Senator Rachael Cabral-Guevara, Chair
Members of the Senate Committee on Health

Testimony on 2025 Senate Bill 832

Relating to: remote dispensing sites under the pharmacy practice law.

Thank you, Chairwoman Cabral-Guevara and other members of the committee, for hearing my testimony on Senate Bill 832 today. Healthcare workforce challenges are not a surprise to anyone in this room, and while our first instinct is to think of nurses or specialists, pharmacists are an area of concern as well. Enrollment in pharmacy doctoral programs is declining, and pharmacy technician programs in Wisconsin have had to close due to a lack of participants. This trend does not bode well for the issues we are already facing today.

Pharmacist shortages are leading to restricted pharmacy hours in both rural and urban areas across the state. Although this bill will benefit all pharmacies and communities, I want to speak to the benefit this legislation would have in my more rural district. In our communities back at home, health care access is challenging, considering the health care deserts we face. Sometimes, pharmacies can help fill in some of the service gaps. In addition to dispensing safe and essential medications, pharmacies can provide easier access for preventative health care services such as immunizations, glucose monitoring, and blood pressure checks. These additional services are helpful in areas such as my own where individuals might have a harder time getting in to see their primary doctor, but still need these preventive health services. When pharmacies cannot operate for their normal business hours due to a lack of a pharmacist on site, all these services go away, and people who need their medication might not be able to get it in a timely manner.

Currently, pharmacies that are based out of health care facilities, practitioner's offices, and correctional facilities are allowed to be a remote dispensing site, where a pharmacist can supervise the pharmacy virtually. This legislation simply allows all pharmacies in the state to operate as a remotely supervised pharmacy if the pharmacy chooses to do so and the pharmacist follows all board rules. Pharmacies would have to abide by the remote dispensing rules already in place and set by the Pharmacy Examining Board, including visiting the pharmacy location once a month, inspecting every label and product before dispensed, following policies and procedures regarding safety, security, and accuracy, and many other regulations. This opens up the opportunity for rural pharmacies to employ a pharmacist that does not have to physically be on site every day. Remote work opportunities are attractive to new potential employees. In rural areas, this is an easier way to recruit pharmacists and keep these doors open.

This is not a permanent solution or a quick fix to keeping pharmacy afloat. The issues facing our pharmacies today are multifaceted, but this is a small step we can take to help ease the burden. Thank you, and I will take any questions at this time.

Respectfully,

Senator Jesse James
23rd Senate District
Sen.James@legis.wisconsin.gov

REMOTE DISPENSING SITE

Definition

A licensed pharmacy where prescriptions can be filled and dispensed without a pharmacist physically present, but instead with remote pharmacist oversight.

Access Limitations

- A pharmacist, pharmacy technician, pharmacy graduate*, or certain pharmacy students** may dispense at a remote dispensing site

Structure & Physical Requirements

- May be located at any of the following locations:
 - » Health care facility
 - » Office or clinic of a practitioner
 - » County jail or rehabilitation facility
 - » Juvenile correctional facility
- Must display a sign to customers stating:
 - » *Prescriptions may be filled at this location. This store is a remote dispensing site being supervised by a pharmacist employed by:*
 - *[Insert Name of employer]*
 - *[Insert employer address]*
 - *[Insert employer telephone number]*
 - » Patient has a right to pharmacist consultation and information on how to file complaint to the board (click [here](#) for a Pharmacy Examining Board-approved consultation sign that can be printed and displayed - remote dispensing sites may also create their own sign, so long as it includes the required information)
- Dispensing cannot occur if a pharmacist is not available remotely
- Prescriptions cannot be dispensed if both the patient and pharmacist's delegate cannot communicate with a pharmacist
- A pharmacy may operate as both a traditional pharmacy and a remote dispensing site pharmacy; licensed pharmacies that meet all other remote dispensing site requirements may operate as a remote dispensing site, with remote pharmacist supervision, when a pharmacist is not present and may operate as a traditional pharmacy when a pharmacist is present.



Administrative & Operational Requirements

- Remote dispensing sites must be licensed as a pharmacy. Instructions for applying for a remote dispensing site pharmacy license can be found [here](#)
- Dispensing requirements
 - » The dispensing pharmacy professional must visually inspect all prescription orders, labels, and dispensed products
 - » The prescription label must comply with labeling requirements under [Phar 7.05](#); the name and address of the remote dispensing site should be on the label, not the address where the supervising pharmacist is located

*A pharmacy graduate is an individual who has graduated from a school of pharmacy, has submitted an application for a Wisconsin pharmacist license and is awaiting their license being issued

** Pharmacy students who have completed their second year of pharmacy school and are enrolled in an accredited pharmacy school may dispense at a remote dispensing site

- » A final check of each prescription must be completed and include the following:
 - Verification that the label is correct
 - Verification that the drug product or device is correct
 - Completion of a drug utilization review
- » The prescription record shall identify the pharmacist (or delegate or automated technology) responsible for each part of the final check
- » The remote dispensing site must comply with federal law if dispensing controlled substances
- Managing pharmacist requirements
 - » Written policies and procedures for system operation, safety, security, accuracy, and access are required
 - » An on-going quality assurance program that monitors performance that includes number of prescriptions dispensed per month, number of medication errors documented, loss or diversion, and documentation of remedial training to prevent future errors must be implemented and tracked
 - » The managing pharmacist must visit the remote dispensing location at least monthly
 - » Documentation of visits at the remote dispensing location must be maintained at the remote dispensing site for a minimum of 5 years
 - » The remote dispensing site must maintain documentation signed and dated by the managing pharmacist indicating that the managing pharmacist accepts responsibility for the site's compliance with all laws and regulations
 - » A managing pharmacist must report to the Pharmacy Examining Board (PEB) if they are responsible for 5 or more remote dispensing sites. A managing pharmacist may not be responsible for more than 10 remote dispensing sites at any given time without approval from the PEB
- Delegate requirements
 - » A pharmacy technician, pharmacy graduate*, or certain pharmacy students** may dispense at a remote dispensing site if they meet all of the following requirements to dispense remotely:
 - Be 18 years of age or older
 - Be a high school graduate or have equivalent education
 - Completed 1500 hours work as pharmacist delegate within 3 years prior to engaging in remote dispensing or completed an accredited pharmacy technician training program

Citations:

Phar 7.05; Phar 7.07; Phar 7.43; 450.03(1) (f) (g); 450.09(2)

Have more questions?

Reach out to the Pharmacy Society of Wisconsin at info@pswi.org

Prepared By

Meghan Wendling, 2025 PharmD Candidate, Concordia University Wisconsin



**Pharmacy Society
of Wisconsin**



NANCY VANDERMEER

STATE REPRESENTATIVE • 70TH ASSEMBLY DISTRICT

TO: Honorable Members of the Senate Committee on Health

FROM: State Representative Nancy VanderMeer

DATE: January 29th, 2026

SUBJECT: Testimony in Support of Senate Bill 832

Thank you, Chair Cabral-Guevara and members of the Senate Committee on Health for holding a hearing on Senate Bill 832 today. As the author of this legislation, along with Senator James, I am pleased to offer testimony in support of the bill.

Senate Bill 832 is intended to improve pharmacy access statewide, particularly in rural and underserved communities experiencing pharmacy closures, reduced operating hours, and workforce shortages that hinder timely access to essential medications.

Across our state, pharmacies are not closing because communities no longer need them. They are closing because many cannot recruit or afford full-time pharmacists, especially in areas with lower prescription volume or challenging reimbursement realities. When a local pharmacy reduces hours or shuts its doors, patients are often forced to drive 30 to 45 minutes for a prescription refill, delay treatment, or go without critical medications altogether. These are not hypothetical concerns; they are daily realities for too many Wisconsinites. Telepharmacy offers a proven solution.

Remote pharmacist supervision, or telepharmacy, allows a licensed pharmacist to provide real-time oversight while trained pharmacy technicians are physically present at the pharmacy site. Wisconsin already allows this model in limited settings, such as hospitals, practitioner clinics, and correctional facilities. This carved-out system has been operating safely and effectively in our state for more than 15 years. However, standalone community pharmacies, the very pharmacies most vulnerable to staffing instability, are excluded under current law.

SB 832 updates this outdated statute by allowing any licensed pharmacy in Wisconsin to operate as a telepharmacy, provided it meets the existing safeguards established by the Pharmacy Examining Board. This bill does not create a new or untested model. It simply extends a proven framework to the locations that need it most.

Importantly, this legislation does not weaken patient safety standards. All current guardrails remain firmly in place. Patients will continue to have the right to speak directly with a pharmacist. No dispensing can occur without real-time pharmacist communication. The same

final verification and drug utilization review required in a traditional pharmacy will still occur under remote supervision. Managing pharmacists remain fully responsible for clinical care, and only trained, state-registered pharmacy technicians meeting strict experience and credentialing requirements may participate.

Wisconsin has an opportunity to modernize pharmacy practice while preserving access to care. Telepharmacy is already authorized in more than half of the country. More than 25 states allow telepharmacy in any licensed pharmacy, and Wisconsin is one of just two states that still restrict its use based on location rather than licensure and oversight.

Now is the time to expand a model that has already proven safe, effective, and essential. Geography or population size should not determine whether a patient can access medications or speak with a pharmacist when they need care most.

I respectfully urge you to support SB 832 to help preserve pharmacy access and strengthen Wisconsin's healthcare infrastructure. Thank you for your time and consideration.



To: Members, Senate Committee on Health

From: Danielle Womack, MPH, HIVPCP
Vice President, Public Policy & Advocacy
Pharmacy Society of Wisconsin

Date: January 29, 2026

Subject: Support for Senate Bill 832

Thank you for the opportunity to submit testimony in support of Senate Bill 832, relating to remotely supervised pharmacies. The Pharmacy Society of Wisconsin (PSW) is the statewide professional association representing pharmacists, pharmacy technicians, and pharmacy students, and we advocate for safe, high-quality pharmacy practice across Wisconsin.

Access to pharmacy services is essential for safe and efficient medication use. Yet across Wisconsin, particularly in rural and underserved communities, pharmacy closures, reduced hours, and workforce shortages are creating pharmacy deserts that limit access to prescriptions, immunizations, and medication management services.

Recent statewide analysis indicates that 24% of Wisconsin neighborhoods qualify as pharmacy shortage areas, encompassing more than 1.24 million residents. Although shortages occur across all communities, they disproportionately affect urban, rural, and low-income areas. Across the state, 35% of urban residents, 16% of suburban residents, and 17% of rural residents live in areas with inadequate pharmacy access. Collectively, these data underscore that pharmacy deserts in Wisconsin are neither isolated nor incidental but rather a growing, systemic challenge (Qato et al., 2025).

Wisconsin pharmacies are facing significant workforce shortages, making it challenging to recruit and retain pharmacists in rural or low-volume areas. At the same time, economic pressures from low prescription volumes and inadequate reimbursement threaten the viability of many pharmacies. These challenges directly affect patients by delaying treatment, reducing medication adherence, and leading to avoidable emergency department visits.

Remote pharmacist supervision is a practice model in which a licensed pharmacist provides oversight of pharmacy operations and patient care from another location using secure, real-time audiovisual technology. While a trained pharmacy technician is physically present at the pharmacy to assist patients and prepare prescriptions, the remotely located pharmacist conducts the same final prescription verification, drug utilization review, and patient counseling that would occur in a traditional, in-person setting. This model allows pharmacies to maintain full regulatory compliance and patient safety standards while expanding access to pharmacist care in communities facing staffing and access challenges.

Remote pharmacist supervision is not new to Wisconsin. Our state has allowed remotely supervised pharmacies for more than 15 years in limited settings such as practitioner clinics, jails, prisons, and healthcare facilities. This restriction places standalone community pharmacies—often the most vulnerable to staffing and financial challenges—at a disadvantage.

Senate Bill 832 modernizes this outdated framework by allowing all pharmacies to use remote pharmacist supervision while retaining all existing patient safety safeguards. This model provides a way to keep pharmacy doors open and services available in communities that might otherwise lose local access.

Importantly, SB 832 does not weaken safety standards. Patients will continue to be informed when the pharmacist is located remotely, will retain the right to speak directly with a pharmacist, and will receive the same final checks and drug utilization reviews as in traditional pharmacies. The supervising pharmacist must be licensed in the state of Wisconsin. The managing pharmacist will continue to retain full professional responsibility for all dispensing and patient care activities and must visit the pharmacy at least once per month to ensure compliance with all policies and procedures. Strict technician qualification and training requirements will remain in place.

By expanding access to remotely supervised pharmacies, Wisconsin can preserve local access to medications, support the healthcare workforce through flexible staffing and improved work-life balance, and improve the financial sustainability of pharmacies while maintaining high-quality care.

The safety of a remotely supervised pharmacy is determined by the regulatory safeguards in place—such as real-time pharmacist oversight, final prescription verification, required patient counseling, and technician training—not by whether the pharmacy is located inside a clinic, correctional facility, or standalone community site. Wisconsin's existing protections apply equally regardless of location, and they have proven effective for more than a decade. As a result, restricting this model based on a pharmacy's physical location does not enhance safety but unnecessarily limits patient access to care. More than 25 states already allow remotely supervised pharmacies without restrictions based on pharmacy location, demonstrating that this model is both safe and effective.

SB 832 is a pragmatic, patient-centered solution that leverages technology to protect access to care, especially in communities at risk of becoming pharmacy deserts. By removing outdated location restrictions while preserving all safety standards, this bill ensures that every Wisconsin resident—regardless of geography—can continue to access pharmacy care.

For these reasons, we respectfully urge you to support SB 832.

Thank you for your time and consideration.

MAP OF WISCONSIN PHARMACY SHORTAGE AREAS (Qato et al., 2025)

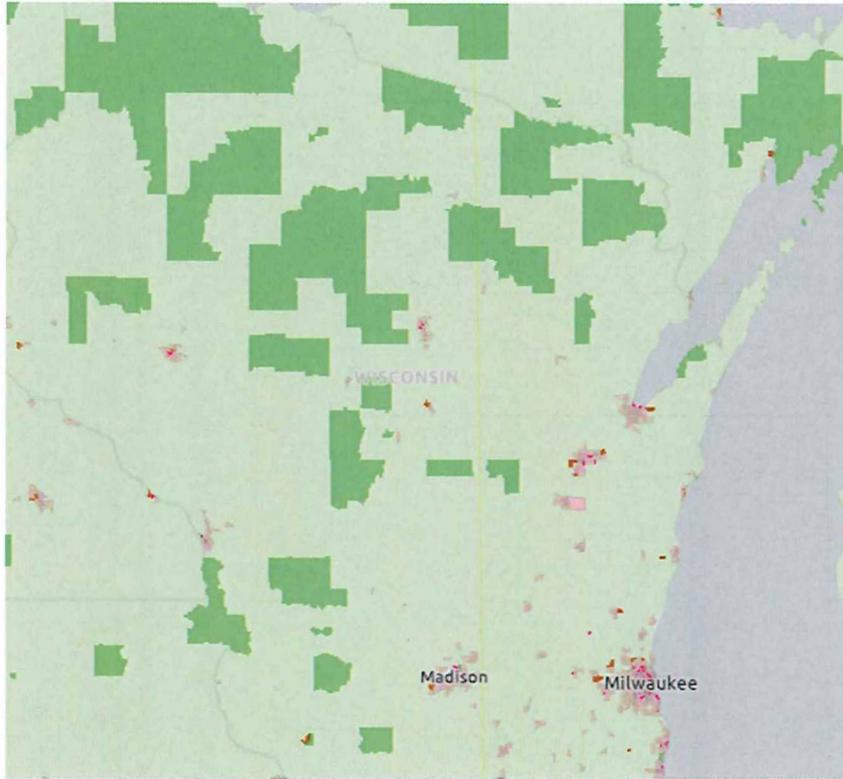
2024 Pharmacies

- ▲ Independent
- Chain
- Clinic

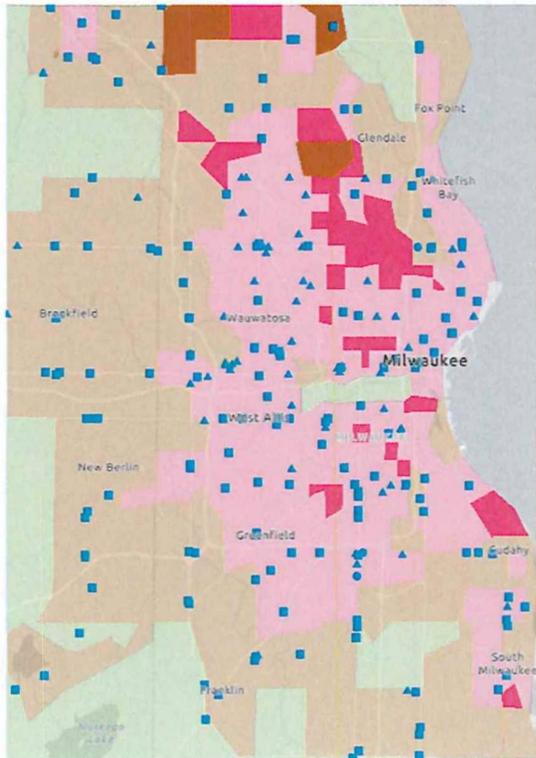
2024 Neighborhood Shortage

- Urban Shortage
- Urban Non-Shortage
- Suburban Shortage
- Suburban Non-Shortage
- Rural Shortage
- Rural Non-Shortage

State of Wisconsin



Greater Milwaukee Area



January 29, 2026

Testimony in Support of Senate Bill ~~833~~ 832

**From: Michelle Farrell, PharmD
Owner, Boscobel Pharmacy & Center Pharmacy**

Thank you for the opportunity to submit testimony in support of Senate Bill 832. My name is Michelle Farrell, and I own Boscobel Pharmacy in Boscobel and Center Pharmacy in Richland Center. In my community, our pharmacy is often the most accessible point of care. For many of our patients, we are not just a place to pick up prescriptions. We are where they come for vaccines, medication questions, chronic disease support, and guidance when they do not know where else to turn. We know our patients by name, and we see firsthand how much they rely on having a local pharmacy they can trust.

Over the past several years, it has become harder and harder to keep our doors open. When we cannot find pharmacist coverage, we are forced to reduce hours or consider closing entirely. When that happens, patients do not simply "go somewhere else." They miss doses, delay care, and sometimes end up in the emergency room for issues that could have been prevented. For elderly patients, people without reliable transportation, and families juggling work and childcare, the loss of a local pharmacy creates real and immediate harm.

Remote pharmacist supervision offers a way to keep pharmacies like mine open when staffing becomes a challenge. Wisconsin has already allowed this model for many years, but only in certain settings, such as clinics, jails, and healthcare facilities. Community pharmacies like mine, which serve as healthcare hubs in our towns, are excluded, even though our patients' needs are just as real.

Senate Bill 832 removes this outdated location restriction while keeping all of the same safety standards in place. Patients must still be able to speak directly with a pharmacist, every prescription must still receive a pharmacist's final review, and the pharmacist remains fully responsible for patient care. The only thing that changes is that community pharmacies are finally allowed to use the same tools as other facilities to stay open and serve their communities.

There is no added safety in limiting this model to certain buildings. What protects patients is the pharmacist's oversight, the technology that connects us, and the standards that govern our practice. Our patients deserve access to care based on need, not geography.

For my pharmacies, this bill would mean stability. It would allow us to share pharmacist coverage across locations, maintain consistent hours, and continue serving our neighbors rather than turning them away. More importantly, it would mean that our patients can continue to receive care close to home from people they know and trust.

Senate Bill 832 is a practical, compassionate solution that puts patients first. I respectfully urge you to support this legislation. Thank you for your time and consideration.



2025 ASSEMBLY BILL 842

January 16, 2026 - Introduced by Representatives VANDERMEER, KRUG, ARMSTRONG, DITTRICH, GOEBEN, GREEN, GUNDRUM, MURPHY and KNODL, cosponsored by Senator JAMES. Referred to Committee on Health, Aging and Long-Term Care.

1 **AN ACT to repeal** 450.09 (2) (b) 1. a. to d.; **to renumber** 450.09 (2) (b) 2. b.; **to**
2 **renumber and amend** 450.09 (2) (b) 2. a.; **to consolidate, renumber and**
3 **amend** 450.09 (2) (b) 1. (intro.) and 2. (intro.); **to amend** 450.01 (21c), 450.02
4 (5) and 450.09 (1) (a) of the statutes; **relating to:** remote dispensing sites
5 under the pharmacy practice law.

Analysis by the Legislative Reference Bureau

Under current law, pharmacies at certain locations, including health care facilities, health care practitioners' offices, correctional facilities such as jails and state prisons, and juvenile justice facilities, may be operated as remote dispensing sites, in which case a pharmacist is not required to be present at the pharmacy but must supervise it remotely. Current law allows the Pharmacy Examining Board to promulgate rules governing pharmacies operated as remote dispensing sites, which may exempt pharmacies operated as remote dispensing sites at these locations from rules that apply to other pharmacies.

This bill eliminates the restrictions on the facilities at which pharmacies may be operated as remote dispensing sites and instead refers to them as remotely supervised pharmacies, thereby allowing any pharmacy to be operated as a remotely supervised pharmacy if the pharmacist complies with the board's rules.

ASSEMBLY BILL 842**SECTION 1**

The people of the state of Wisconsin, represented in senate and assembly, do enact as follows:

1 **SECTION 1.** 450.01 (21c) of the statutes is amended to read:

2 450.01 **(21c)** ~~“Remote dispensing site”~~ “Remotely supervised pharmacy”
3 means a pharmacy governed by s. 450.09 (2) (b) 2.

4 **SECTION 2.** 450.02 (5) of the statutes is amended to read:

5 450.02 **(5)** The board may promulgate rules governing pharmacies that are
6 operated as ~~remote dispensing sites~~ remotely supervised pharmacies. Rules
7 promulgated under this subsection may exempt pharmacies operated as ~~remote~~
8 ~~dispensing sites~~ remotely supervised pharmacies from requirements governing
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11 **SECTION 3.** 450.09 (1) (a) of the statutes is amended to read:

12 450.09 **(1)** (a) Every pharmacy shall be under the control of the managing
13 pharmacist who signed the pharmacy license application, the most recent license
14 renewal application or the most recent amended schedule of operations. The
15 managing pharmacist shall be responsible for the professional operations of the
16 pharmacy. A pharmacist may be the managing pharmacist of not more than one
17 community and one institutional pharmacy at any time and shall be engaged in the
18 practice of pharmacy at each location he or she supervises. The board shall by rule
19 define community pharmacy and institutional pharmacy for the purposes of this
20 section, but a pharmacy that is operated exclusively as a ~~remote dispensing site~~
21 remotely supervised pharmacy shall not be considered a community pharmacy or
22 institutional pharmacy for the purposes of this paragraph.



NANCY VANDERMEER

STATE REPRESENTATIVE • 70TH ASSEMBLY DISTRICT

TO: Honorable Members of the Assembly Committee on Health, Aging and Long-Term Care

FROM: State Representative Nancy VanderMeer

DATE: February 4th, 2026

SUBJECT: Testimony in Support of Assembly Bill 842

Thank you, Chair Moses and members of the Assembly Committee on Health, Aging and Long-Term Care for holding a hearing on Assembly Bill 842 today. As the author of this legislation, along with Senator James, I am pleased to offer testimony in support of the bill.

Assembly Bill 842 is intended to improve pharmacy access statewide, particularly in rural and underserved communities experiencing pharmacy closures, reduced operating hours, and workforce shortages that hinder timely access to essential medications.

Across our state, pharmacies are not closing because communities no longer need them. They are closing because many cannot recruit or afford full-time pharmacists, especially in areas with lower prescription volume or challenging reimbursement realities. When a local pharmacy reduces hours or shuts its doors, patients are often forced to drive 30 to 45 minutes for a prescription refill, delay treatment, or go without critical medications altogether. These are not hypothetical concerns; they are daily realities for too many Wisconsinites. Telepharmacy offers a proven solution.

Remote pharmacist supervision, or telepharmacy, allows a licensed pharmacist to provide real-time oversight while trained pharmacy technicians are physically present at the pharmacy site. Wisconsin already allows this model in limited settings, such as hospitals, practitioner clinics, and correctional facilities. This carved-out system has been operating safely and effectively in our state for more than 15 years. However, standalone community pharmacies, the very pharmacies most vulnerable to staffing instability, are excluded under current law.

AB 842 updates this outdated statute by allowing any licensed pharmacy in Wisconsin to operate as a telepharmacy, provided it meets the existing safeguards established by the Pharmacy Examining Board. This bill does not create a new or untested model. It simply extends a proven framework to the locations that need it most.

Importantly, this legislation does not weaken patient safety standards. All current guardrails remain firmly in place. Patients will continue to have the right to speak directly with a pharmacist. No dispensing can occur without real-time pharmacist communication. The same final verification and drug utilization review required in a traditional pharmacy will still occur

under remote supervision. Managing pharmacists remain fully responsible for clinical care, and only trained, state-registered pharmacy technicians meeting strict experience and credentialing requirements may participate.

Wisconsin has an opportunity to modernize pharmacy practice while preserving access to care. Telepharmacy is already authorized in more than half of the country. More than 25 states allow telepharmacy in any licensed pharmacy, and Wisconsin is one of just two states that still restrict its use based on location rather than licensure and oversight.

Now is the time to expand a model that has already proven safe, effective, and essential. Geography or population size should not determine whether a patient can access medications or speak with a pharmacist when they need care most.

I respectfully urge you to support Assembly Bill 842 to help preserve pharmacy access and strengthen Wisconsin's healthcare infrastructure. Thank you for your time and consideration.



February 4th, 2026

Representative Clint Moses, Chair

Members of the Assembly Committee on Health, Aging, and Long-Term Care

Testimony on 2025 Assembly Bill 842

Relating to: remote dispensing sites under the pharmacy practice law.

Thank you, Chairman Moses and other members of the committee, for hearing my testimony on Assembly Bill 842 today. Healthcare workforce challenges are not a surprise to anyone in this room, and while our first instinct is to think of nurses or specialists, pharmacists are an area of concern as well. Enrollment in pharmacy doctoral programs is declining, and pharmacy technician programs in Wisconsin have had to close due to a lack of participants. This trend does not bode well for the issues we are already facing today.

Pharmacist shortages are leading to restricted pharmacy hours in both rural and urban areas across the state. Although this bill will benefit all pharmacies and communities, I want to speak to the benefit this legislation would have in my more rural district. In our communities back at home, health care access is challenging, considering the health care deserts we face. Sometimes, pharmacies can help fill in some of the service gaps. In addition to dispensing safe and essential medications, pharmacies can provide easier access for preventative health care services such as immunizations, glucose monitoring, and blood pressure checks. These additional services are helpful in areas such as my own where individuals might have a harder time getting in to see their primary doctor, but still need these preventive health services. When pharmacies cannot operate for their normal business hours due to a lack of a pharmacist on site, all these services go away, and people who need their medication might not be able to get it in a timely manner.

Currently, pharmacies that are based out of health care facilities, practitioner's offices, and correctional facilities are allowed to be a remote dispensing site, where a pharmacist can supervise the pharmacy virtually. This legislation simply allows all pharmacies in the state to operate as a remotely supervised pharmacy if the pharmacy chooses to do so and the pharmacist follows all board rules. Pharmacies would have to abide by the remote dispensing rules already in place and set by the Pharmacy Examining Board, including visiting the pharmacy location once a month, inspecting every label and product before dispensed, following policies and procedures regarding safety, security, and accuracy, and many other regulations. This opens up the opportunity for rural pharmacies to employ a pharmacist that does not have to physically be on site every day. Remote work opportunities are attractive to new potential employees. In rural areas, this is an easier way to recruit pharmacists and keep these doors open.

This is not a permanent solution or a quick fix to keeping pharmacy afloat. The issues facing our pharmacies today are multifaceted, but this is a small step we can take to help ease the burden. Thank you, and I will take any questions at this time.

Respectfully,

Senator Jesse James

23rd Senate District

Sen.James@legis.wisconsin.gov

REMOTE DISPENSING SITE

Definition

A licensed pharmacy where prescriptions can be filled and dispensed without a pharmacist physically present, but instead with remote pharmacist oversight.

Access Limitations

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Structure & Physical Requirements

- May be located at any of the following locations:
 - » Health care facility
 - » Office or clinic of a practitioner
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 - » Juvenile correctional facility
- Must display a sign to customers stating:
 - » *Prescriptions may be filled at this location. This store is a remote dispensing site being supervised by a pharmacist employed by:*
 - *[Insert Name of employer]*
 - *[Insert employer address]*
 - *[Insert employer telephone number]*
 - » Patient has a right to pharmacist consultation and information on how to file complaint to the board (click [here](#) for a Pharmacy Examining Board-approved consultation sign that can be printed and displayed - remote dispensing sites may also create their own sign, so long as it includes the required information)
- Dispensing cannot occur if a pharmacist is not available remotely
- Prescriptions cannot be dispensed if both the patient and pharmacist's delegate cannot communicate with a pharmacist
- A pharmacy may operate as both a traditional pharmacy and a remote dispensing site pharmacy; licensed pharmacies that meet all other remote dispensing site requirements may operate as a remote dispensing site, with remote pharmacist supervision, when a pharmacist is not present and may operate as a traditional pharmacy when a pharmacist is present.



Administrative & Operational Requirements

- Remote dispensing sites must be licensed as a pharmacy. Instructions for applying for a remote dispensing site pharmacy license can be found [here](#)
- Dispensing requirements
 - » The dispensing pharmacy professional must visually inspect all prescription orders, labels, and dispensed products
 - » The prescription label must comply with labeling requirements under [Phar 7.05](#); the name and address of the remote dispensing site should be on the label, not the address where the supervising pharmacist is located

*A pharmacy graduate is an individual who has graduated from a school of pharmacy, has submitted an application for a Wisconsin pharmacist license and is awaiting their license being issued

** Pharmacy students who have completed their second year of pharmacy school and are enrolled in an accredited pharmacy school may dispense at a remote dispensing site

- » A final check of each prescription must be completed and include the following:
 - Verification that the label is correct
 - Verification that the drug product or device is correct
 - Completion of a drug utilization review
- » The prescription record shall identify the pharmacist (or delegate or automated technology) responsible for each part of the final check
- » The remote dispensing site must comply with federal law if dispensing controlled substances
- Managing pharmacist requirements
 - » Written policies and procedures for system operation, safety, security, accuracy, and access are required
 - » An on-going quality assurance program that monitors performance that includes number of prescriptions dispensed per month, number of medication errors documented, loss or diversion, and documentation of remedial training to prevent future errors must be implemented and tracked
 - » The managing pharmacist must visit the remote dispensing location at least monthly
 - » Documentation of visits at the remote dispensing location must be maintained at the remote dispensing site for a minimum of 5 years
 - » The remote dispensing site must maintain documentation signed and dated by the managing pharmacist indicating that the managing pharmacist accepts responsibility for the site's compliance with all laws and regulations
 - » A managing pharmacist must report to the Pharmacy Examining Board (PEB) if they are responsible for 5 or more remote dispensing sites. A managing pharmacist may not be responsible for more than 10 remote dispensing sites at any given time without approval from the PEB
- Delegate requirements
 - » A pharmacy technician, pharmacy graduate*, or certain pharmacy students** may dispense at a remote dispensing site if they meet all of the following requirements to dispense remotely:
 - Be 18 years of age or older
 - Be a high school graduate or have equivalent education
 - Completed 1500 hours work as pharmacist delegate within 3 years prior to engaging in remote dispensing or completed an accredited pharmacy technician training program

Citations:

Phar 7.05; Phar 7.07; Phar 7.43; 450.03(1) (f) (g); 450.09(2)

Have more questions?

Reach out to the Pharmacy Society of Wisconsin at info@pswi.org

Prepared By

Meghan Wendling, 2025 PharmD Candidate, Concordia University Wisconsin



**Pharmacy Society
of Wisconsin**

February 4, 2026

Testimony in Support of Assembly Bill 842

**From: Michelle Farrell, PharmD
Owner, Boscobel Pharmacy & Center Pharmacy**

Thank you for the opportunity to submit testimony in support of Assembly Bill 842. My name is Michelle Farrell, and I own Boscobel Pharmacy in Boscobel and Center Pharmacy in Richland Center. In my community, our pharmacy is often the most accessible point of care. For many of our patients, we are not just a place to pick up prescriptions. We are where they come for vaccines, medication questions, chronic disease support, and guidance when they do not know where else to turn. We know our patients by name, and we see firsthand how much they rely on having a local pharmacy they can trust.

Over the past several years, it has become harder and harder to keep our doors open. When we cannot find pharmacist coverage, we are forced to reduce hours or consider closing entirely. When that happens, patients do not simply "go somewhere else." They miss doses, delay care, and sometimes end up in the emergency room for issues that could have been prevented. For elderly patients, people without reliable transportation, and families juggling work and childcare, the loss of a local pharmacy creates real and immediate harm.

Remote pharmacist supervision offers a way to keep pharmacies like mine open when staffing becomes a challenge. Wisconsin has already allowed this model for many years, but only in certain settings, such as clinics, jails, and healthcare facilities. Community pharmacies like mine, which serve as healthcare hubs in our towns, are excluded, even though our patients' needs are just as real.

Assembly Bill 842 removes this outdated location restriction while keeping all of the same safety standards in place. Patients must still be able to speak directly with a pharmacist, every prescription must still receive a pharmacist's final review, and the pharmacist remains fully responsible for patient care. The only thing that changes is that community pharmacies are finally allowed to use the same tools as other facilities to stay open and serve their communities.

There is no added safety in limiting this model to certain buildings. What protects patients is the pharmacist's oversight, the technology that connects us, and the standards that govern our practice. Our patients deserve access to care based on need, not geography.

For my pharmacies, this bill would mean stability. It would allow us to share pharmacist coverage across locations, maintain consistent hours, and continue serving our neighbors rather than turning them away. More importantly, it would mean that our patients can continue to receive care close to home from people they know and trust.

Assembly Bill 842 is a practical, compassionate solution that puts patients first. I respectfully urge you to support this legislation. Thank you for your time and consideration.



To: Members, Assembly Committee on Health, Aging & Long-Term Care

From: Danielle Womack, MPH, HIVPCP
Vice President, Public Policy & Advocacy
Pharmacy Society of Wisconsin

Date: February 4, 2026

Subject: Support for Assembly Bill 842

Thank you for the opportunity to submit testimony in support of Assembly Bill 842, relating to remotely supervised pharmacies. The Pharmacy Society of Wisconsin (PSW) is the statewide professional association representing pharmacists, pharmacy technicians, and pharmacy students, and we advocate for safe, high-quality pharmacy practice across Wisconsin.

Access to pharmacy services is essential for safe and efficient medication use. Yet across Wisconsin, particularly in rural and underserved communities, pharmacy closures, reduced hours, and workforce shortages are creating pharmacy deserts that limit access to prescriptions, immunizations, and medication management services.

Recent statewide analysis indicates that 24% of Wisconsin neighborhoods qualify as pharmacy shortage areas, encompassing more than 1.24 million residents. Although shortages occur across all communities, they disproportionately affect urban, rural, and low-income areas. Across the state, 35% of urban residents, 16% of suburban residents, and 17% of rural residents live in areas with inadequate pharmacy access. Collectively, these data underscore that pharmacy deserts in Wisconsin are neither isolated nor incidental but rather a growing, systemic challenge (Qato et al., 2025).

Wisconsin pharmacies are facing significant workforce shortages, making it challenging to recruit and retain pharmacists in rural or low-volume areas. At the same time, economic pressures from low prescription volumes and inadequate reimbursement threaten the viability of many pharmacies. These challenges directly affect patients by delaying treatment, reducing medication adherence, and leading to avoidable emergency department visits.

Remote pharmacist supervision is a practice model in which a licensed pharmacist provides oversight of pharmacy operations and patient care from another location using secure, real-time audiovisual technology. While a trained pharmacy technician is physically present at the pharmacy to assist patients and prepare prescriptions, the remotely located pharmacist conducts the same final prescription verification, drug utilization review, and patient counseling that would occur in a traditional, in-person setting. This model allows pharmacies to maintain full regulatory compliance and patient safety standards while expanding access to pharmacist care in communities facing staffing and access challenges.

Remote pharmacist supervision is not new to Wisconsin. Our state has allowed remotely supervised pharmacies for more than 15 years in limited settings such as practitioner clinics, jails, prisons, and healthcare facilities. This restriction places standalone community pharmacies—often the most vulnerable to staffing and financial challenges—at a disadvantage.

Assembly Bill 842 modernizes this outdated framework by allowing all pharmacies to use remote pharmacist supervision while retaining all existing patient safety safeguards. This model provides a way to keep pharmacy doors open and services available in communities that might otherwise lose local access.

Importantly, Assembly Bill 842 does not weaken safety standards. Patients will continue to be informed when the pharmacist is located remotely, will retain the right to speak directly with a pharmacist, and will receive the same final checks and drug utilization reviews as in traditional pharmacies. The supervising pharmacist must be licensed in the state of Wisconsin. The managing pharmacist will continue to retain full professional responsibility for all dispensing and patient care activities and must visit the pharmacy at least once per month to ensure compliance with all policies and procedures. Strict technician qualification and training requirements will remain in place.

By expanding access to remotely supervised pharmacies, Wisconsin can preserve local access to medications, support the healthcare workforce through flexible staffing and improved work-life balance, and improve the financial sustainability of pharmacies while maintaining high-quality care.

The safety of a remotely supervised pharmacy is determined by the regulatory safeguards in place—such as real-time pharmacist oversight, final prescription verification, required patient counseling, and technician training—not by whether the pharmacy is located inside a clinic, correctional facility, or standalone community site. Wisconsin's existing protections apply equally regardless of location, and they have proven effective for more than a decade. As a result, restricting this model based on a pharmacy's physical location does not enhance safety but unnecessarily limits patient access to care. More than 25 states already allow remotely supervised pharmacies without restrictions based on pharmacy location, demonstrating that this model is both safe and effective.

Assembly Bill 842 is a pragmatic, patient-centered solution that leverages technology to protect access to care, especially in communities at risk of becoming pharmacy deserts. By removing outdated location restrictions while preserving all safety standards, this bill ensures that every Wisconsin resident—regardless of geography—can continue to access pharmacy care.

For these reasons, we respectfully urge you to support Assembly Bill 842.

Thank you for your time and consideration.

MAP OF WISCONSIN PHARMACY SHORTAGE AREAS (Qato et al., 2025)

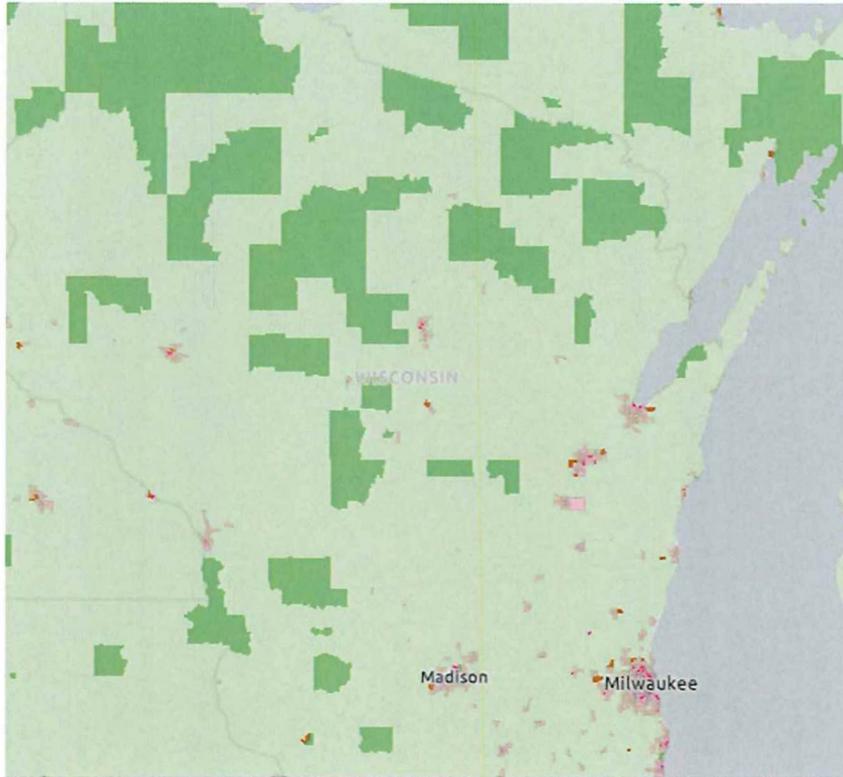
2024 Pharmacies

- ▲ Independent
- Chain
- Clinic

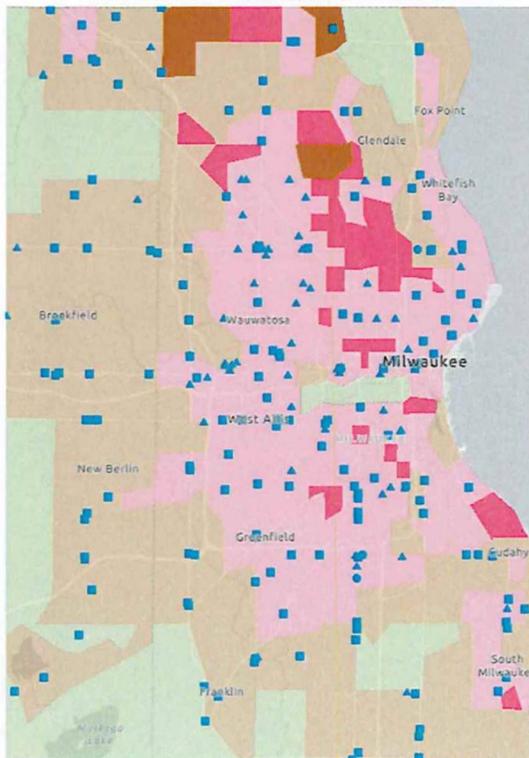
2024 Neighborhood Shortage

- Urban Shortage
- Urban Non-Shortage
- Suburban Shortage
- Suburban Non-Shortage
- Rural Shortage
- Rural Non-Shortage

State of Wisconsin



Greater Milwaukee Area





2025 SENATE BILL 898

January 27, 2026 - Introduced by Senator CABRAL-GUEVARA, cosponsored by Representatives GUSTAFSON and SUBECK. Referred to Committee on Health.

1 **AN ACT** *to renumber and amend* 15.405 (9); *to create* 15.405 (9) (b) of the
2 statutes; **relating to:** the membership of the Pharmacy Examining Board.

Analysis by the Legislative Reference Bureau

Under current law, the Pharmacy Examining Board, which licenses pharmacists, pharmacies, and other entities involved in the supply chain for prescription drugs and registers pharmacy technicians, consists of seven members, including five pharmacists and two public members. This bill adds two registered pharmacy technicians to the membership of the board.

The people of the state of Wisconsin, represented in senate and assembly, do enact as follows:

3 **SECTION 1.** 15.405 (9) of the statutes is renumbered 15.405 (9) (intro.) and
4 amended to read:

5 15.405 (9) PHARMACY EXAMINING BOARD. (intro.) There is created a
6 pharmacy examining board in the department of safety and professional services-

SENATE BILL 898**SECTION 1**

1 ~~The pharmacy examining board shall consist~~ consisting of the following ~~7~~ 9
2 members appointed for staggered 4-year terms.:

3 (a) ~~Five of the members shall be~~ who are licensed to ~~practice pharmacy in this~~
4 state pharmacists under ch. 450.

5 (e) ~~Two members shall be~~ public members.

6 **SECTION 2.** 15.405 (9) (b) of the statutes is created to read:

7 15.405 (9) (b) Two members who are registered pharmacy technicians under
8 ch. 450.

9 **SECTION 3. Nonstatutory provisions.**

10 (1) Notwithstanding the length of terms specified in s. 15.405 (9) (intro.), the
11 initial members of the pharmacy examining board appointed under s. 15.405 (9) (b)
12 shall be appointed for the following terms:

13 (a) One of the initial members shall be appointed for a term expiring on July
14 1, 2028.

15 (b) One of the initial members shall be appointed for a term expiring on July
16 1, 2030.

17 (END)



RACHAEL A. CABRAL-GUEVARA

STATE SENATOR • 19TH SENATE DISTRICT

Testimony before the Senate Committee on Health

Senator Rachael Cabral-Guevara

January 29, 2026

Hello, members of the Senate Committee on Health. Thank you for the opportunity to provide testimony in support of Senate Bill 898, which would expand the membership of the Pharmacy Examining Board by adding two registered pharmacy technicians, bringing the total from seven to nine members.

Under current law, the Pharmacy Examining Board is composed of five licensed pharmacists and two public members. The board plays a vital role in protecting public health by licensing pharmacists and pharmacies, overseeing other entities in the prescription drug supply chain, and registering pharmacy technicians under statute. Pharmacy technicians are indispensable to safe and efficient pharmacy operations across Wisconsin. They handle critical tasks such as preparing prescriptions, managing inventory, verifying accuracy in dispensing, and supporting pharmacists in patient interactions—all while working under supervision to ensure patient safety and access to medications.

Despite their essential contributions and direct stake in the board's regulatory decisions—including licensing standards, continuing education requirements, disciplinary processes, and rule-making—pharmacy technicians have no dedicated representation on the board that governs their profession. This proposal addresses this gap by adding two registered pharmacy technicians to the membership. This modest change would infuse the board with frontline practical expertise, foster more inclusive and informed decision-making, and better reflect the collaborative nature of modern pharmacy teams, where technicians perform a substantial share of the technical work that enables pharmacists to focus on clinical responsibilities.

Importantly, this bill maintains pharmacists as the clear majority on the board, preserving their leadership role while enhancing overall representation. Several other states have successfully included pharmacy technicians on their boards, demonstrating that this approach promotes collaboration, strengthens regulatory oversight, and improves outcomes for patients and the profession without adding additional cost or complexity.

Wisconsin's pharmacy regulatory framework should evolve to fully account for the entire workforce that delivers safe, high-quality care to our residents. Adding two registered pharmacy technicians is a common-sense reform that will make the Pharmacy Examining Board more representative, effective, and responsive to the realities of today's pharmacies.

I am hopeful you are able to support this important proposal. Thank you for your time.



Testimony of the Author

In Support of 2025 Senate Bill 898

Thank you, Chairperson and members of the committee.

Senate Bill 898 updates the membership of the Pharmacy Examining Board by adding two registered pharmacy technicians. Under current law, the board consists of five pharmacists and two public members. However, Wisconsin statutes already provide the Pharmacy Examining Board with regulatory oversight of registered pharmacy technicians. It is simply common sense that those being regulated should have a voice at the table.

While pharmacists play a critical role in patient care, pharmacy technicians are also essential to the day-to-day operations of pharmacies and to patient safety. They work on the front lines of medication preparation, dispensing, and regulatory compliance.

Including pharmacy technicians on the board will strengthen its understanding of how policies and regulations affect real-world pharmacy practice. Senate Bill 898 ensures that licensing and regulatory decisions reflect the full scope of the pharmacy workforce.

This bill promotes balanced representation, informed decision-making, and improved oversight—ultimately benefiting patients and strengthening Wisconsin’s pharmacy system. I respectfully ask for your support of Senate Bill 898.

Thank you, and I’m happy to answer any questions.



To: Members, Senate Committee on Health

**From: Danielle Womack, MPH, HIVPCP
Vice President, Public Policy & Advocacy
Pharmacy Society of Wisconsin**

Date: January 29, 2026

Subject: Support for Senate Bill 898

Thank you for the opportunity to submit testimony in support of Senate Bill 898, relating to the membership of the Pharmacy Examining Board. The Pharmacy Society of Wisconsin (PSW) is the statewide professional association representing pharmacists, pharmacy technicians, and pharmacy students, and advocating for safe, high-quality pharmacy practice across Wisconsin.

The Pharmacy Examining Board has critical responsibilities for licensing, rule-making, and discipline in pharmacy practice. Currently, by statute, the PEB consists of seven members -- five pharmacists and two public members. SB 898 proposes updating the composition of this board to additionally include two registered pharmacy technicians as board members, thereby broadening practitioner representation.

Pharmacy technicians play an essential role in the safe and efficient delivery of pharmacy services across diverse practice settings. Technicians are integral to operations, from accurate prescription preparation to medication inventory management, and they maintain direct involvement in daily patient care workflows under pharmacist supervision.

Including pharmacy technicians on the Pharmacy Examining Board would strengthen professional governance and better reflect the realities of contemporary pharmacy practice. Pharmacy technicians are registered professionals with unique insights into workflow, patient safety, and day-to-day regulatory compliance, and their perspectives would help ensure that rule-making and disciplinary decisions account for the full spectrum of the pharmacy workforce.

The Pharmacy Examining Board directly regulates pharmacy technicians, and board decisions have significant implications for their registration, scope of practice, and professional accountability. Despite this, technicians currently have no direct representation on the body that oversees their regulation and adjudicates disciplinary matters.

Including a pharmacy technician on the board would ensure that a practical, real-world understanding of technician roles, responsibilities, training, and supervision structures informs disciplinary cases involving technicians. A technician's perspective can help the board distinguish between individual misconduct and systemic or workflow-related issues, leading to fair, balanced, and well-informed regulatory outcomes that continue to prioritize patient safety while ensuring due process for regulated professionals.

PSW has long supported evidence-based, collaborative regulation that protects the public and promotes high standards of professional practice. By creating seats for pharmacy technicians, SB 898 aligns governance with the realities of modern pharmacy care and supports a more comprehensive regulatory framework.

The Pharmacy Society of Wisconsin respectfully urges the Senate Committee on Health to support Senate Bill 898. We believe this legislation enhances the Pharmacy Examining Board's ability to serve Wisconsin's patients, practitioners, and employers by ensuring the board reflects the full range of professionals responsible for safe medication use.

Thank you for your consideration.



To: Senate Committee on Health

From: Taylor Flores, CPhT, RPhT
President-Elect, Technician Section
Pharmacy Society of Wisconsin

Date: January 29, 2026

Subject: Support for Senate Bill 898

Thank you for the opportunity to provide testimony today in support of Senate Bill 898. My name is Taylor Flores, and I am a registered pharmacy technician practicing in Wisconsin and serve as the President-Elect of the Technician Section of the Pharmacy Society of Wisconsin. I am proud of the role pharmacy technicians play in protecting patient safety and supporting access to care in our communities.

Pharmacy technicians are critical members of the pharmacy team, regulated by the Pharmacy Examining Board. The rules adopted by the Pharmacy Examining Board determine how we practice, how we are trained, and, when necessary, how we are disciplined. Yet under the current board member structure, technicians have no voice on the very board that regulates our profession. Senate Bill 898 addresses this gap by allowing pharmacy technicians to serve on the Pharmacy Examining Board.

Technicians are on the front lines of pharmacy every day. We are responsible for preparing prescriptions, managing inventory, handling insurance processing, supporting patients, administering vaccines, and maintaining compliance with complex regulations. We work in community pharmacies, hospitals, long-term care facilities, clinics, and specialty settings. Because of this, we have firsthand knowledge of how regulations impact workflow, patient safety, and staffing realities.

As the Pharmacy Examining Board has responsibility for promulgating the rules relating to the practice of pharmacy and the activities that constitute the practice of a pharmacy technician, the addition of two registered pharmacy technicians to its membership gives our profession a voice. In the same way that our roles have expanded and grown to become critical members of all pharmacy teams, pharmacy technicians can provide unique insight into the decisions being weighed by the board. Through collaboration with the other members of the board, our combined perspectives can drive better decisions on technician supervision, task delegation, technician knowledge and training, and our involvement and leadership in real world pharmacy operations across all pharmacy practice settings today.

This bill is about improving oversight. Including pharmacy technicians strengthens the Pharmacy Examining Board by bringing in practical insight that supports fair, balanced, and informed regulatory decisions. It also signals that Wisconsin recognizes pharmacy technicians as essential members of the healthcare team.

As the pharmacy workforce continues to evolve, our regulatory bodies should reflect the professionals they oversee. Senate Bill 898 is a meaningful step toward a more modern and effective Pharmacy Examining Board.

I respectfully urge you to support Senate Bill 898. Thank you for your time and for your commitment to patient safety and the pharmacy profession.

Good Morning. Thank you for allowing me to testify today. My name is John Weitekamp. I have been a pharmacist for over 42 years with the last 6 years serving as Chairman of the Wisconsin Pharmacy Examining Board. I am testifying today as a pharmacist and a citizen of the State of Wisconsin. I am in no way representing the Wisconsin Pharmacy Examining Board or its members. During my time as a pharmacist, I have seen the profession of a Pharmacy Technician, change dramatically. They started out as basically a salesclerk with the periodic assignment of counting tablets to assist the pharmacist. Today, they play an integral role in the pharmacy workforce. They perform critical tasks every day that directly impact patient safety and pharmacy operations. Pharmacy technicians are now able to administer immunizations and fill prescriptions at a remote pharmacy location with a pharmacist checking and consulting from another location. They also have the ability to offer tech check tech verification of prescriptions as well as assisting the pharmacist in day-to-day operations. In November 2024, registration of pharmacy technicians went into effect. This registration allowed the Wisconsin Pharmacy Examining Board to administer possible discipline to a Pharmacy Technician on a case by case basis. Therefore, I believe that because of the importance that a Pharmacy Technician has in everyday operations of a pharmacy, their voice in the rulemaking process is of great value. I also believe that because they are now registered, and may face disciplinary proceedings, their input into those proceedings is important. They may see cases from a different perspective than a pharmacist's perspective. During my time serving on the Wisconsin Pharmacy Examining Board, I have seen the value of the input from the 2 public members currently serving on the board. I would now like to see the input of 2 Pharmacy Technicians by getting their opinions on the rule making process as well as the disciplinary process. I strongly support Senate Bill 898 and I ask all of you for your support. Thank you for your time, and I am here to answer any questions.



NATE GUSTAFSON

STATE REPRESENTATIVE • 55TH ASSEMBLY DISTRICT

Testimony of the Author

In Support of 2025 Assembly Bill 899

Thank you, Chairperson and members of the committee.

Assembly Bill 899 updates the membership of the Pharmacy Examining Board by adding two registered pharmacy technicians. Under current law, the board consists of five pharmacists and two public members. However, Wisconsin statutes already provide the Pharmacy Examining Board with regulatory oversight of registered pharmacy technicians. It is simply common sense that those being regulated should have a voice at the table.

While pharmacists play a critical role in patient care, pharmacy technicians are also essential to the day-to-day operations of pharmacies and to patient safety. They work on the front lines of medication preparation, dispensing, and regulatory compliance.

Including pharmacy technicians on the board will strengthen its understanding of how policies and regulations affect real-world pharmacy practice. Assembly Bill 899 ensures that licensing and regulatory decisions reflect the full scope of the pharmacy workforce.

This bill promotes balanced representation, informed decision-making, and improved oversight—ultimately benefiting patients and strengthening Wisconsin’s pharmacy system. I respectfully ask for your support of Assembly Bill 899.

Thank you, and I’m happy to answer any questions.



RACHAEL A. CABRAL-GUEVARA

STATE SENATOR • 19TH SENATE DISTRICT

Testimony before the Assembly Committee on Health, Aging, and Long-Term Care

Senator Rachael Cabral-Guevara

February 4, 2026

Hello, members of the Assembly Committee on Health, Aging, and Long-Term Care. Thank you for the opportunity to provide testimony in support of Assembly Bill 899, which would expand the membership of the Pharmacy Examining Board by adding two registered pharmacy technicians, bringing the total from seven to nine members.

Under current law, the Pharmacy Examining Board is composed of five licensed pharmacists and two public members. The board plays a vital role in protecting public health by licensing pharmacists and pharmacies, overseeing other entities in the prescription drug supply chain, and registering pharmacy technicians under statute. Pharmacy technicians are indispensable to safe and efficient pharmacy operations across Wisconsin. They handle critical tasks such as preparing prescriptions, managing inventory, verifying accuracy in dispensing, and supporting pharmacists in patient interactions—all while working under supervision to ensure patient safety and access to medications.

Despite their essential contributions and direct stake in the board's regulatory decisions—including licensing standards, continuing education requirements, disciplinary processes, and rule-making—pharmacy technicians have no dedicated representation on the board that governs their profession. This proposal addresses this gap by adding two registered pharmacy technicians to the membership. This modest change would infuse the board with frontline practical expertise, foster more inclusive and informed decision-making, and better reflect the collaborative nature of modern pharmacy teams, where technicians perform a substantial share of the technical work that enables pharmacists to focus on clinical responsibilities.

Importantly, this bill maintains pharmacists as the clear majority on the board, preserving their leadership role while enhancing overall representation. Several other states have successfully included pharmacy technicians on their boards, demonstrating that this approach promotes collaboration, strengthens regulatory oversight, and improves outcomes for patients and the profession without adding additional cost or complexity.

Wisconsin's pharmacy regulatory framework should evolve to fully account for the entire workforce that delivers safe, high-quality care to our residents. Adding two registered pharmacy technicians is a common-sense reform that will make the Pharmacy Examining Board more representative, effective, and responsive to the realities of today's pharmacies.

I am hopeful you are able to support this important proposal. Thank you for your time.



To: Members, Assembly Committee on Health, Aging & Long-Term Care

**From: Danielle Womack, MPH, HIVPCP
Vice President, Public Policy & Advocacy
Pharmacy Society of Wisconsin**

Date: February 4, 2026

Subject: Support for Assembly Bill 899

Thank you for the opportunity to submit testimony in support of Assembly Bill 899, relating to the membership of the Pharmacy Examining Board. The Pharmacy Society of Wisconsin (PSW) is the statewide professional association representing pharmacists, pharmacy technicians, and pharmacy students, and advocating for safe, high-quality pharmacy practice across Wisconsin.

The Pharmacy Examining Board has critical responsibilities for licensing, rule-making, and discipline in pharmacy practice. Currently, by statute, the PEB consists of seven members -- five pharmacists and two public members. Assembly Bill 899 proposes updating the composition of this board to additionally include two registered pharmacy technicians as board members, thereby broadening practitioner representation.

Pharmacy technicians play an essential role in the safe and efficient delivery of pharmacy services across diverse practice settings. Technicians are integral to operations, from accurate prescription preparation to medication inventory management, and they maintain direct involvement in daily patient care workflows under pharmacist supervision.

Including pharmacy technicians on the Pharmacy Examining Board would strengthen professional governance and better reflect the realities of contemporary pharmacy practice. Pharmacy technicians are registered professionals with unique insights into workflow, patient safety, and day-to-day regulatory compliance, and their perspectives would help ensure that rule-making and disciplinary decisions account for the full spectrum of the pharmacy workforce.

The Pharmacy Examining Board directly regulates pharmacy technicians, and board decisions have significant implications for their registration, scope of practice, and professional accountability. Despite this, technicians currently have no direct representation on the body that oversees their regulation and adjudicates disciplinary matters.



Including a pharmacy technician on the board would ensure that a practical, real-world understanding of technician roles, responsibilities, training, and supervision structures informs disciplinary cases involving technicians. A technician’s perspective can help the board distinguish between individual misconduct and systemic or workflow-related issues, leading to fair, balanced, and well-informed regulatory outcomes that continue to prioritize patient safety while ensuring due process for regulated professionals.

PSW has long supported evidence-based, collaborative regulation that protects the public and promotes high standards of professional practice. By creating seats for pharmacy technicians, Assembly Bill 899 aligns governance with the realities of modern pharmacy care and supports a more comprehensive regulatory framework.

The Pharmacy Society of Wisconsin respectfully urges the Assembly Committee on Health, Aging & Long-Term Care to support Assembly Bill 899. We believe this legislation enhances the Pharmacy Examining Board’s ability to serve Wisconsin’s patients, practitioners, and employers by ensuring the board reflects the full range of professionals responsible for safe medication use.

Thank you for your consideration.



To: Assembly Committee on Health, Aging & Long-Term Care

From: Taylor Flores, CPhT, RPhT
President-Elect, Technician Section
Pharmacy Society of Wisconsin

Date: February 4, 2026

Subject: Support for Assembly Bill 899

Thank you for the opportunity to provide testimony today in support of Assembly Bill 899. My name is Taylor Flores, and I am a registered pharmacy technician practicing in Wisconsin and serve as the President-Elect of the Technician Section of the Pharmacy Society of Wisconsin. I am proud of the role pharmacy technicians play in protecting patient safety and supporting access to care in our communities.

Pharmacy technicians are critical members of the pharmacy team, regulated by the Pharmacy Examining Board. The rules adopted by the Pharmacy Examining Board determine how we practice, how we are trained, and how we are disciplined. Yet under current law, technicians have no voice on the very board that regulates our profession. Assembly Bill 899 addresses this gap by allowing pharmacy technicians to serve on the Pharmacy Examining Board.

Technicians are on the front lines of pharmacy every day. We are responsible for preparing prescriptions, managing inventory, handling insurance processing, supporting patients, administering vaccines, and maintaining compliance with complex regulations. We work in community pharmacies, hospitals, long-term care facilities, clinics, and specialty settings. Because of this, we have firsthand knowledge of how regulations impact workflow, patient safety, and staffing realities.

When disciplinary cases involve pharmacy technicians, decisions are often made without the perspective of someone who understands the structure of technician supervision, task delegation, and real-world pharmacy operations. A technician voice on the Pharmacy Examining Board would help ensure that these cases are reviewed with a full understanding of how pharmacies function, while still holding all professionals to high standards of safety and accountability.

This bill is about improving oversight. Including pharmacy technicians strengthens the Pharmacy Examining Board by bringing in practical insight that supports fair, balanced, and informed regulatory decisions. It also signals that Wisconsin recognizes pharmacy technicians as essential members of the healthcare team.

As the pharmacy workforce continues to evolve, our regulatory bodies should reflect the professionals they oversee. Assembly Bill 899 is a meaningful step toward a more modern and effective Pharmacy Examining Board.

I respectfully urge you to support Assembly Bill 899. Thank you for your time and for your commitment to patient safety and the pharmacy profession.

Testimony in Support of Assembly Bill 899

John Weitekamp, RPh

Thank you for allowing me submit testimony today. My name is John Weitekamp. I have been a pharmacist for over 42 years with the last 6 years serving as Chairman of the Wisconsin Pharmacy Examining Board. I am testifying today as a pharmacist and a citizen of the State of Wisconsin. I am in no way representing the Wisconsin Pharmacy Examining Board or its members. During my time as a pharmacist, I have seen the profession of a Pharmacy Technician, change dramatically. They started out as basically a salesclerk with the periodic assignment of counting tablets to assist the pharmacist. Today, they play an integral role in the pharmacy workforce. They perform critical tasks every day that directly impact patient safety and pharmacy operations. Pharmacy technicians are now able to administer immunizations and fill prescriptions at a remote pharmacy location with a pharmacist checking and consulting from another location. They also have the ability to offer tech check tech verification of prescriptions as well as assisting the pharmacist in day-to-day operations. In November 2024, registration of pharmacy technicians went into effect. This registration allowed the Wisconsin Pharmacy Examining Board to administer possible discipline to a Pharmacy Technician on a case by case basis. Therefore, I believe that because of the importance that a Pharmacy Technician has in everyday operations of a pharmacy, their voice in the rulemaking process is of great value. I also believe that because they are now registered, and may face disciplinary proceedings, their input into those proceedings is important. They may see cases from a different perspective than a pharmacist's perspective. During my time serving on the Wisconsin Pharmacy Examining Board, I have seen the value of the input from the 2 public members currently serving on the board. I would now like to see the input of 2 Pharmacy Technicians by getting their opinions on the rule making process as well as the disciplinary process. I strongly support Assembly Bill 899 and I ask all of you for your support. Thank you for your time.

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

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Nilajah Hardin Administrative Rules Coordinator		2) Date when request submitted: 2/16/26 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
3) Name of Board, Committee, Council, Sections: Pharmacy Examining Board			
4) Meeting Date: 2/26/26	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Administrative Rule Matters – Discussion and Consideration 1. Pending or Possible Rulemaking Projects	
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: N/A	
10) Describe the issue and action that should be addressed: Attachments: 1. Rule Projects Chart Copies of current Board Rule Projects Can be Viewed Here: https://dsps.wi.gov/Pages/RulesStatutes/PendingRules.aspx			
11) Authorization/			
 Signature of person making this request		2/16/26 Date	
Supervisor (if required)		Date	
Executive Director signature (indicates approval to add post agenda deadline item to agenda) Date			
Directions for including supporting documents: 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.			

**Pharmacy Examining Board
Rule Projects (updated 2/16/26)**

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 tabled at 10/16/25 Meeting	TBD
26-013 EmR 2601	002-25	07/13/2027	Phar 1, 6, 7, and 10	Pharmacy Workplace Conditions	Public Hearing on both rules at 02/26/26 Meeting; Emergency Rule Draft Effective 02/03/26-07/02/26	Drafting Final Permanent Rule and Legislative Report for Submission to Governor and Legislature
25-073	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	Drafting Final Rule and Legislative Report	Submission to Governor and Legislature

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

AGENDA REQUEST FORM

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3) Name of Board, Committee, Council, Sections: Pharmacy Examining Board			
4) Meeting Date: 2/26/2026	5) Attachments: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6) How should the item be titled on the agenda page? Guidance on Compounding Pharmacies, Phar 15, and Semaglutide/Tirzepatide Production – Discussion and Consideration	
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 <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:			
11) Authorization			
		2/16/2026	
Signature of person making this request		Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items 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**

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3) Name of Board, Committee, Council, Sections: Pharmacy Examining Board			
4) Meeting Date: 2/16/2026	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Speaking Engagements, Travel, or Public Relation Requests, and Reports – Discussion and Consideration 1) Travel Request: MPJE Item Development Workshop, March 11-13, 2026 – Mt. Prospect, IL 2) Speaking Engagement Report: PSW Legislative Day, February 11, 2026 – 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 Appearance Request 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:			
11) Authorization			
 Signature of person making this request		2/16/2026 Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
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**State of Wisconsin
Department of Safety & Professional Services**



Wisconsin Pharmacy Examining Board Update

Pharmacy Society of Wisconsin Legislative Days

Wednesday, February 11, 2026

100



Agenda

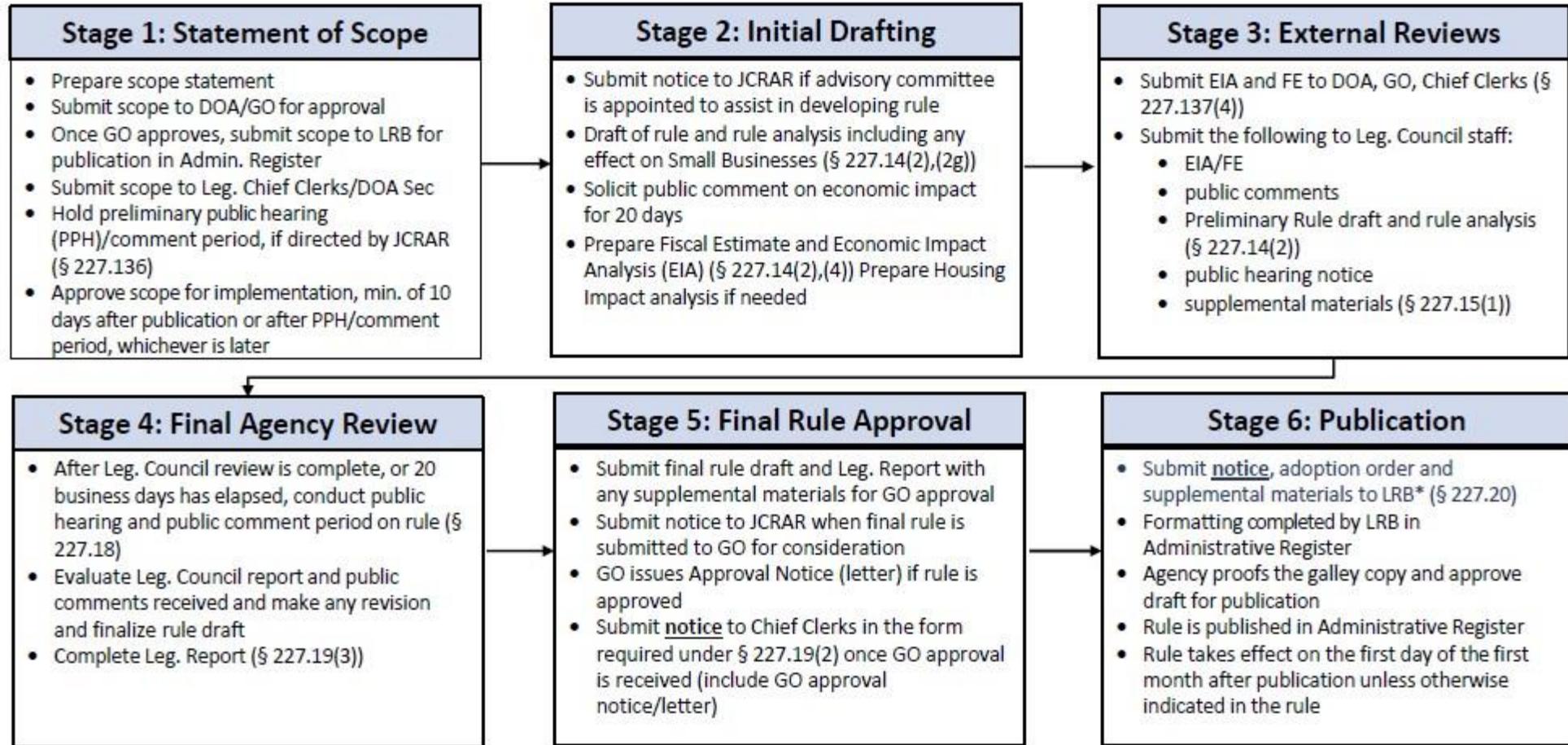
- ▶ Board Membership
- ▶ Rule Promulgation process overview
- ▶ Rule Projects Overview
 - ▶ Phar 7 – relating to Electronic Prescriptions, Prescription Labeling, CPR of Pharmacists, Epinephrine Delivery Systems, Controlled Substance Prescription Transfers, Remote Dispensing, Managing Pharmacist Definition, Initial Consultation, Alteration, and Final Check
- ▶ Multistate Jurisprudence Examination Pilot Program
- ▶ Interdisciplinary Advisory Committee
- ▶ Board Resources

Board Membership

The Pharmacy Examining Board is created in appointed by the Governor and confirmed by the Legislature to serve 4-year terms. The Board consists of 5 licensed pharmacist members and 2 public members.

Member	Officer	Member Type	Term Expiration
John Weitekamp	Chairperson	Pharmacist Member	7/1/2026
Tiffany O'Hagan	Vice Chairperson	Pharmacist Member	7/1/2028
Erick Sokn		Pharmacist Member	7/1/2029
Anthony Peterangelo	Secretary	Pharmacist Member	7/1/2027
Vacant**		Public Member	
Paul Esser		Public Member	7/1/2029
Christa Wilson		Pharmacist Member	7/1/2029

Overview of Administrative **Permanent** Rulemaking Process Post *Evers v. Marklein II*



Please note this overview describes the general process for permanent rulemaking. Please refer to the steps set forth in Wis. Stat. ch. 227 and discuss any questions, concerns, etc.. with your agency's Chief Legal Counsel.

*Currently under Judicial Review, LRB is mandating notice be submitted a second time after the Legislative Standing Committee jurisdiction has ended.

Rule Projects Overview

CH Rule Number	Scope Expiration	Code Chapter Affected	Relating Clause	Stage of Rule Process
<u>Scope Number 002-25</u>	7/13/2027	Phar 1, 6, 7, and 10	Pharmacy Workplace Conditions	<p>Permanent Rule: Public hearing scheduled for 2/26/2026</p> <p>Emergency Rule: Rule effective 2/3/2026. Public hearing scheduled for 2/26/2026</p>
<u>CR 25-073</u>	2/5/2027	Phar 7	Remote Dispensing 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.	<p>Rule Drafting. Public hearing was held on 12/18/2025.</p> <p>The Rules Committee will be discussing the final rule draft during the February 26, 2026, meeting. The Board has received public comments and will be reviewing during the February meeting.</p>

Phar 7: Secure Chat, Change in Prescription

- The **preliminary rule** will update requirements to align with current pharmacy practice in areas of electronic prescriptions, labelling, CPR for pharmacists, implement the statutory changes from 2023 Wisconsin Act 27, as well as other practice areas.
- Verbal Prescription and Prescription via Secure Texting Platform
 - Amending 7.02 (4) to include prescriptions via secure texting platform. This section is amended to include prescriptions orders received through a HIPAA compliant secure texting platform are allowed.
- Alterations
 - Amending 7.02 (5) if the alteration does not modify the original intent of the prescription, the pharmacist shall use their professional judgment when determining whether necessary to contact the practitioner.
- Controlled Substances
 - The transfer of controlled substances is allowed consistent with 21 CFR 1306.
- Additional Certification for Pharmacists
 - Every licensed pharmacist to administers drug product or devices or vaccines, shall maintain current CPR and basic life support certifications.



Multistate Jurisprudence Examination (MPJE) Pilot Program

- Registering for the jurisprudence examination prior to graduating eliminates stressors of having to study and complete multiple examinations upon graduation
- The National Association of Boards of Pharmacy issued a pilot program with North Dakota and Wisconsin to allow students to take the MPJE prior to graduation.



Pilot Summary

The 'Pilot Program' is a trial process for allowing pre-APPE pharmacy students to take the MPJE in their final year, prior to degree conferral.

<u>e-Profiles & Eligibility:</u>	Rostered Students	e-Profiles		Elig Applied	Elig Granted
	120	115	96%	143	126
			% of Rostered		

<u>Timeframes:</u>	Pilot Purchase to Registration	Historic Purchase to Registration	Max Pilot Exams Taken	Max Historic Exams Taken
	34 days	41 days	September	July

<u>Exams & Pass Rate:</u>	Scheduled	Delivered	Released		Pilot Passing Rate	'20-24 WI-MPJE 1st Attempt Pass Rate
	23	84	80	59	74%	80.5%
				PASS		107



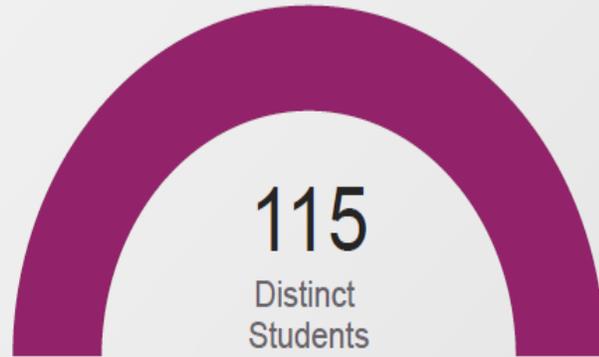
Eligibility Overview

MPJE
2025
Year

143
Eligibility

112
ATTs

Pilot Students with Eligibility Applications



Roster Total
120

Eligibility Granted
126

Eligibility Requested
10

Application Withdrawn
7

College	Eligibility Applied Students	e-Profiles
Concordia Univ Wisconsin	37	37
Medical Coll of Wisconsin	32	32
Univ of Wisconsin-Madison	46	46
Total	115	115

School	Roster
Concordia Univ of Wisc	39
Med Coll of Wisc	35
Univ of Wisc-Madison	46
Total	120

Year	Applications
2024	
May	24
June	39
July	14
August	5
September	4
October	7
November	14
December	1
2025	
January	4
February	4
March	14
April	13
Total	143



Results

Exams Taken

84

Pilot Passing Rate

74%

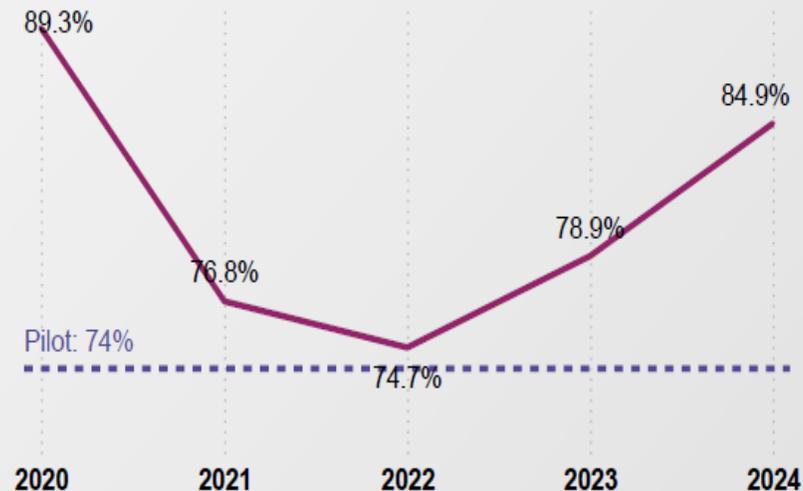
Unreleased

4

Released Results

PASS	FAIL
59	21

Historic Pass Rates for MPJE-WI First Attempts



Released Results

College	FAIL	PASS	Total
Concordia Univ Wisconsin	8	19	27
Medical Coll of Wisconsin	6	16	22
Univ of Wisconsin-Madison	7	24	31
Total	21	59	80



MPJE Pilot Program Successes

- ▶ NABP received positive feedback from students.
- ▶ The assurance of completing one exam for licensure requirement (~80% exams delivered).
- ▶ Students created e-Profile account and added education record prior to degree conferral.
- ▶ The ease of scheduling exams at PearsonVUE in Aug/Sept/Jan (non-peak) versus peak testing season June/July.

Interdisciplinary Advisory Committee

- ▶ The Interdisciplinary Advisory Committee launched in August 2024.
 - ▶ Members are comprised from the Medical Examining Board, Physician Assistants Affiliated Credentialing Board, Board of Nursing, Cosmetology Examining Board, Controlled Substances Board, and the Pharmacy Examining Board.
- ▶ The committee's charge is to issue guidance or recommendations on emerging topics that effect public safety.
- ▶ The committee has published-guidance for IV Hydration Clinics and is available on the Pharmacy Examining Board website.
- ▶ The Interdisciplinary Advisory Committee is currently discussing guidance for Ketamine clinics.
- ▶ During the December 10, 2025, meeting, the Committee agreed to have the Pharmacy Examining Board discuss and draft guidance on compounding pharmacies, Semaglutide/Tirzepatide Production.
- ▶ Future topics:
 - ▶ Emerging Medi-spa Practices

Board Resources: Application/License

- DSPS Self Service Menu (Various links that may be of interest during presentation):
<https://dsps.wi.gov/Pages/SelfService/Default.aspx>
 - License FAQs <https://dsps.wi.gov/Pages/LicensE.aspx>
 - License Lookup <https://license.wi.gov/s/application-status-lookup>
 - License Verification (OLVS)
<https://dsps.wi.gov/Pages/SelfService/BusinessHealth/OLVS.aspx>
 - Inspections <https://dsps.wi.gov/Pages/SelfService/Inspections.aspx>
 - File a Complaint <https://dsps.wi.gov/Pages/SelfService/FileAComplaint.aspx>
 - Orders and Disciplinary Actions
<https://dsps.wi.gov/Pages/SelfService/OrdersDisciplinaryActions.aspx> (Search by individual or by issuing Board within a set timeframe)
 - Professional Assistance Procedure (PAP)
<https://dsps.wi.gov/Pages/SelfService/ProfessionalAssistanceProcedure.aspx>
 - Sign up for Email Communications
<https://public.govdelivery.com/accounts/WIDSPS/subscriber/new>
 - Monthly License Counts <https://dsps.wi.gov/Credentialing/General/LicenseCounts.pdf>
 - Order List of Licensees <https://dspslicenselist.wi.gov/>

Board Resources: Staying Informed

► Board Information

- PEB Landing Page (Links to resources throughout DSPS site, most current vacancy information available to public: <https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Default.aspx>)
- Pharmacy License and Pharmacy Technician Renewal: <https://dsps.wi.gov/Pages/Professions/Pharmacist/Default.aspx>
- PEB Meetings Page (access: Open Session Meeting Agendas, Meeting Dates): <https://dsps.wi.gov/Pages/BoardsCouncils/Pharmacy/Meetings.aspx>
- Statute and Administrative Code <https://dsps.wi.gov/Pages/RulesStatutes/Pharmacy.aspx>
- 2025 Top 100 Drug List https://dsps.wi.gov/Documents/BoardCouncils/PHM/2026_TOP%20100%20DRUGS%20A%20TO%20Z%20BRAND%20NAME%20%28002%29.pdf2022
- Pharmacist's Manual for Controlled Substances https://www.dea diversion.usdoj.gov/GDP/%28DEA-DC-046R1%29%28EO-DEA154R1%29%29_Pharmacist%27s_Manual_DEA.pdf