



April 16, 2020

Philip Trapskin
[redacted]
[redacted]

RE: Variance Request per Wis. Stat. § 450.02(3m)

Dear Mr. Trapskin,

On April 16, 2020, the Wisconsin Pharmacy Examining Board reviewed your variance request. You requested a variance of Wis. Stat. § 450.072(2)(b) to **temporarily allow wholesale distributors to deliver prescription drugs and devices to addresses approved by the board**. The stated purpose of the request is to enable the creation and use of “surge sites” to help respond to the COVID-19 emergency.

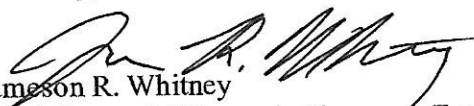
The effect of the variance would modify Wis. Stat. § 450.072(2)(b) to read as follows:

(b) A manufacturer or wholesale distributor may distribute a prescription drug only to the premises listed on the person's license or authorization, or to a facility or other site that has been approved by the Pharmacy Examining Board or its designee after written request to the board, and authorized by the Drug Enforcement Administration if the facility or other site is to receive controlled substances, except that a manufacturer or wholesale distributor may distribute the prescription drugs to an authorized agent of the person at the premises of the manufacturer or wholesale distributor if all of the following are true:

The Board considered the evidence presented and determined that the requirements of Wis. Stat. § 450.02(3m)(a) have been met. **Your variance, as requested, has been granted.** This variance shall apply to all persons legally permitted to engage in the wholesale distribution of prescription drugs or devices in the state of Wisconsin, and shall remain in effect for 90 days from today's date pursuant to Wis. Stat. § 450.02(3m)(b), unless modified or extended by further action of the Pharmacy Examining Board.

Please feel free to contact me if you have any questions.

Sincerely,


Jameson R. Whitney
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