



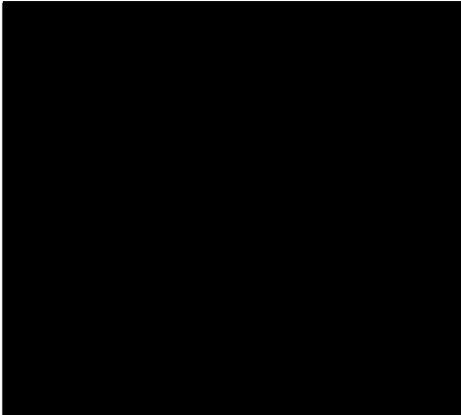
Wisconsin Department of Regulation & Licensing
Pharmacy Examining Board
1400 East Washington Avenue
Madison, Wisconsin 53703

VIA EMAIL AND U.S. MAIL

January 20, 2011

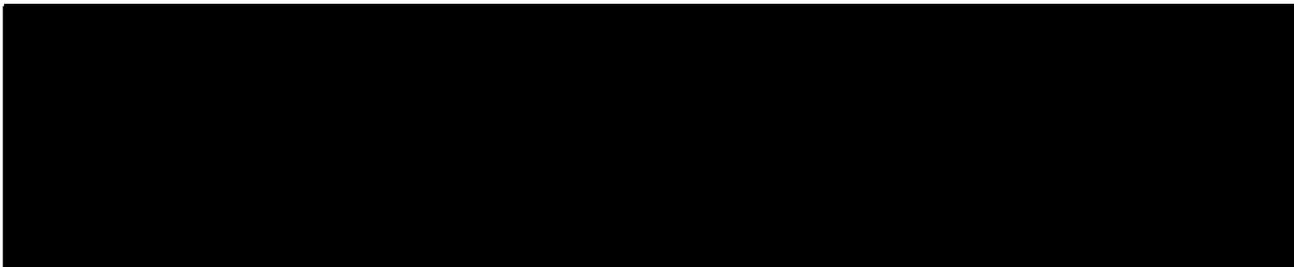
To the Wisconsin Pharmacy Examining Board:

I am writing you to request a variance from Wisconsin Administrative Code Phar 7.01(1)(e) for the following sites:



The Pharmacy Examining Board's authority to grant the above-requested variance derives from Sections 15.08(5) and 450.02(3), Wis. Stats., as well as Wisconsin Administrative Code Phar 7.01(4).

Administrative Code Phar 7.01(1)(e) specifies that a pharmacy practice may deliver prescriptions only to a patients residence. [redacted] and [redacted] are seeking this variance so that it may offer to the employees of [redacted] and their family members the ability to obtain their prescription medications from an in-network provider with the added convenience of workplace pick-up. Specifically, [redacted] is requesting the ability to deliver prescriptions from the noted pharmacies for [redacted] employees to the [redacted] Office Center located at [redacted]



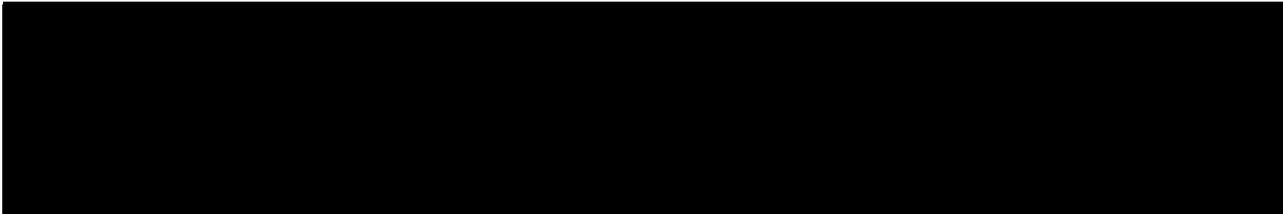
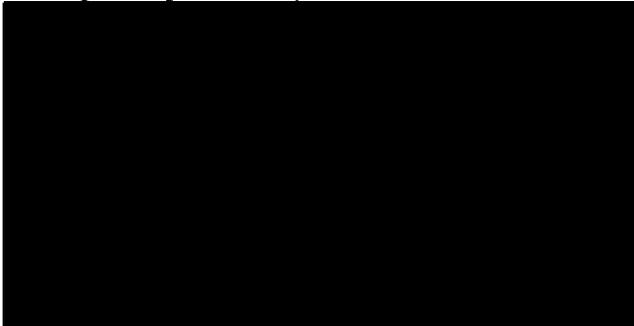


The Board, in granting identical variance requests, has recognized that as long as certain procedural requirements are strictly adhered to, the delivery of prescription medications to an employees' workplace can be done safely, efficiently and privately. [REDACTED] believes this variance will benefit employees by improving compliance and reducing overall costs, while maintaining the high standards for safety and privacy established by the Board. The following policy for workplace delivery reflects and incorporates these standards.

The pharmacies envision delivering prescriptions for [REDACTED] employees for both new prescriptions and refill requests. The dispensing process will be followed as outlined in the attached Policy and Procedure.

Thank you for your consideration of the proposed variance. I would greatly appreciate if this request could be included on the agenda for the next Board meeting. Please inform me if a personal appearance is necessary. In the interim, if you have any additional questions, please feel free to contact me at [REDACTED]

Respectfully submitted,



Policy TITLE here
Policy NUMBER here

Page 2 of 3

2. Clinical Appropriateness

- 2.1 After receipt of the prescription, the pharmacist will confirm its clinical appropriateness and the pharmacy will fill the order. Allergies and interactions will be reviewed with each medication processing and appropriately addressed
- 2.2 Prior to delivery, on all new prescriptions, the pharmacist will consult with the patient directly through private telephone conversation. During the conversation, the pharmacist will counsel the patient regarding the medication(s) prescribed and answer questions that he or she may have regarding the medication therapy.

3. Prescription Delivery

- 3.1 After the prescription has been filled, checked for allergies/interactions and verified by the pharmacist, an agent of the pharmacy will deliver the prescribed medication(s) to a central location located [REDACTED] where the employee will pick up the prescription(s) and sign for them.
- 3.2 All prescriptions will include a medication monograph and a notice of "Offer to Consult." The "Offer to Consult" will provide a direct telephone number to the pharmacy for the patient to call for their consultation, to ask questions, or clarify any problem or issue that may occur.
- 3.3 The central delivery location will have a secure, locked location where the prescriptions will be stored until the patient or patient representative picks up their medication(s). Any prescription remaining after a week at the Office Center will be returned to the pharmacy.
- 3.4 All first-time employee patients will receive the Notice of Privacy Practices with their medication(s) and the employee will sign to acknowledge the receipt of it upon delivery.
- 3.5 The delivery signature log will be returned to the pharmacy. The pharmacy will record acknowledgement of the privacy notice and will file the delivery signature log in accordance with policy and procedure.
- 3.6 No prescription medication will be delivered pursuant to this variance request to individuals who are not [REDACTED] employees. Delivery will be made only on behalf of [REDACTED] or [REDACTED] employees and their family members. Delivery of prescription medications will not occur until the pharmacy has confirmed that such delivery on behalf of the employee or family member is intended.

4 Refill Requests

- 4.1 Refill requests will follow this same process, except the patient or his or her representative will communicate the refill request to the pharmacy. If clinically appropriate, the pharmacist will refill the prescription(s).

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]