



August 20, 2025

Brad Wojciechowski
Executive Director, Pharmacy Examining Board
4822 Madison Yards Way
Madison, WI 53708-8366

RE: ATA ACTION COMMENTS REGARDING DRAFT IV HYDRATION GUIDANCE DOCUMENTS

Dear Executive Director Wojciechowski and members of the Pharmacy Examining Board,

On behalf of ATA Action, I am writing you to express our concerns with the Draft IV Hydration Guidance Document prepared by the Interdisciplinary Advisory Committee and up for discussion and consideration at the Board's August 21 meeting.

ATA Action, the American Telemedicine Association's affiliated trade association focused on advocacy, advances policy to ensure all individuals have permanent access to telehealth services across the care continuum. ATA Action supports the enactment of state and federal telehealth policies to secure telehealth access for all Americans, including those in rural and underserved communities. ATA Action recognizes that telehealth and virtual care have the potential to truly transform the health care delivery system – by improving patient outcomes, enhancing safety and effectiveness of care, addressing health disparities, and reducing costs – if only allowed to flourish.

While our organization does not have policy principles regarding the operation and regulation of IV hydration clinics, the Proposed Guidance Document includes language regarding telehealth examinations that we believe deviates from existing Wisconsin Administrative Code and statute. There is a footnote included in the Proposed Guidance Document which states "Telehealth is only acceptable if it meets established regulations. See Wis. Admin. Code chs. Med 24, PA 3 and N 8." In Code Chapters Med 24 and PA 3 it is clearly stated that licensed providers "shall be held to the same standards of practice and conduct including patient confidentiality and recordkeeping, regardless of whether health care services are provided in person or by telemedicine." As currently drafted, the Proposed Guidance Document is more restrictive and potentially discriminatory towards telehealth by recommending patient assessment be done in person. This could create confusion for licensed providers and have a chilling effect on innovation for technological uses in healthcare in Wisconsin.

Our organization firmly believes that licensed providers and patients should have access to any modality which will meet the standard of care for the condition presented by the patient. In order to best align with existing code and avoid confusion, ATA Action recommends changes be made to this section to align the use of telemedicine with the standard of care.

Thank you for the opportunity to comment. We urge you to consider our concerns and make the requisite edits before advancing the Proposed Guidance Document. Please do not hesitate to let us know how we can be helpful to your efforts to advance common-sense telehealth policy in

ATA ACTION

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Wisconsin. If you have any questions or would like to discuss the telehealth industry's perspective further, please contact me at kzebley@ataaction.org.

Kind regards,

A handwritten signature in black ink, appearing to read "Kyle Zebley", written over a faint, light grey grid background.

Kyle Zebley
Executive Director
ATA Action