



March 24, 2014

Christopher Barry, R.Ph.
Commission Chair
Pharmacy Quality Assurance Commission
Washington State Department of Health

Dear Mr. Barry,

On March 6, 2014 the Washington State Hospital Association (WSHA) addressed the Pharmacy Quality Assurance Commission and requested emergency rulemaking for the Washington Administrative Code (WAC) 246-873-060 Emergency Outpatient Medications. As currently written, the WAC prohibits some hospitals from dispensing controlled substances to patients when normal community or hospital pharmacy services are not available. This impedes hospitals' ability to provide compassionate, evidence-based, and efficient care.

WSHA, on behalf of our members, is pleased to provide the Commission with revised language for WAC 246-873-06. The revisions keep true to the original intent of the WAC, while allowing hospitals to continue to provide evidence-based and compassionate care.

In general, the revisions are intended to enhance the WAC by:

1. Allowing hospitals to provide emergency pharmaceuticals, including controlled substances, when normal community or hospital pharmacy services are not available;
2. Establishing measureable criteria around access to normal community or hospital pharmacy services;
3. Placing criteria on how medications are prescribed and the supply dispensed to a patient; and
4. Identifying structural procedures around which medications can be dispensed as emergency pharmaceuticals.

Thank you for considering our recommendations. The Commission's commitment to expedite the emergency rulemaking process for this WAC is greatly appreciated and will help to preserve the safety and general welfare of the public.

If you or your staff have any questions, please contact Ian Corbridge, WSHA Policy Director, Clinical Issues, at ianc@wsha.org or (206) 216-2514.

Sincerely,

Claudia Sanders
Senior Vice President
Policy Development

WAC 246-873-060

Emergency outpatient medications.

The director of pharmacy of a hospital shall, in concert with the appropriate committee of the hospital medical staff, develop policies and procedures, which shall be implemented, to provide emergency pharmaceuticals to outpatients during hours when normal community or hospital pharmacy services are not available within a 15 mile radius. The delivery of a single dose for immediate administration to the patient shall not be subject to this regulation. Such policies shall allow the designated registered nurse(s) to deliver medications, including controlled substances, pursuant to the policies and procedures which shall require that:

(1) The practitioner authorized to prescribe must present a valid medication order either in writing or electronically prior to a medication being dispensed to a patient. Verbal orders must be verified by the prescriber in writing or electronically prior to a medication being dispensed to patient.

(2) The medication is prepackaged by a pharmacist and has a label that contains:

(a) Name, address, and telephone number of the hospital.

(b) The name of the drug (as required by chapter [246-899](#) WAC), strength and number of units.

(c) Cautionary information as required for patient safety and information.

(d) An expiration date after which the patient should not use the medication.

(3) No more than a 72-hour supply shall be provided to a patient, except when the pharmacist has informed the prescriber and appropriate hospital personnel that normal community or hospital pharmacy services will not be available within 72 hours.

(4) The container is labeled by the designated registered nurse(s) before presenting to the patient and shows the following:

(a) Name of patient;

(b) Directions for use by the patient;

(c) Date;

(d) Identifying number;

(e) Name of prescribing practitioner;

(f) Initials of the registered nurse;

(5) The original or a direct copy of the order by the prescriber is retained for verification by the pharmacist after completion by the designated registered nurse(s) and shall bear:

(a) Name and address of patient;

(b) Date of issuance;

(c) Units issued;

(d) Initials of designated registered nurse.

(6) The medications to be delivered as emergency pharmaceuticals shall be kept in a locked place in or near the emergency room in such a manner as to preclude the necessity for entry into the pharmacy.

(7) Medications dispensed under this rule must be pre-approved by the hospital director of pharmacy in concert with the appropriate hospital medical staff.

[Statutory Authority: RCW [18.64.005](#). WSR 92-12-035 (Order 277B), § 246-873-060, filed 5/28/92, effective 6/28/92. Statutory Authority: RCW [18.64.005](#) and chapter [18.64A](#) RCW. WSR 91-18-057 (Order 191B), recodified as § 246-873-060, filed 8/30/91, effective 9/30/91. Statutory Authority: RCW [18.64.005](#). WSR 89-12-011 (Order 225), § 360-17-055, filed 5/26/89; WSR 83-23-109 (Order 179), § 360-17-055, filed 11/23/83.]