



WASHINGTON STATE PHARMACY QUALITY ASSURANCE COMMISSION

newsletter to promote pharmacy and drug law compliance

No. 1379 Telehealth Training Required

Health care professionals who offer telemedicine services to patients must now complete telemedicine training before offering those services. This is a mandate of Revised Code of Washington (RCW) 43.70.495.

To learn more about the training options available and access additional resources, please visit the Washington State Telehealth Collaborative Training [web page](#). To participate in any of these free trainings, you must enroll by creating a Canvas account via the [Washington State Medical Professional Telemedicine Training](#).

The RCW defines telemedicine as “the delivery of health care services through the use of interactive audio and video technology, permitting real-time communication between the patient at the originating site and the provider, for the purpose of diagnosis, consultation, or treatment.”

Additionally, [Engrossed Substitute House Bill 1196](#), passed during the 2021 legislative session, requires that audio-only telemedicine is reimbursed at the same rate as if the services were performed in person. Please note: certain services such as those that are customarily performed over audio-only technology (eg, facsimile and email) are not considered audio-only telemedicine.

No. 1380 Updates on Sterile and Nonsterile Self-Inspection Worksheet Addendums

The 2021 Washington State Legislature passed Substitute House Bill (SHB) 1445, changing the definition of “compounding” to exclude reconstitution. SHB 1445 became effective on July 25, 2021. Specific exclusion conditions were made for both sterile and nonsterile reconstituted drug products.

At the June 4, 2021 business meeting, the Washington State Pharmacy Quality Assurance Commission voted to approve enforcement discretion, waiving the requirements to complete sterile and nonsterile self-inspection addendums for licensees who are only engaging in reconstitution, until August 1, 2021.

Additionally, the Commission approved changes to the compounding sections of the General Self-Inspection Worksheet and Hospital Pharmacy and HPAC Self-Inspection Worksheet to reflect the changes to the definition of “compounding” in statute. The revised forms are available on the Commission’s [website](#).

No. 1381 Board Refiles Emergency Rules for Sections in Chapter 246-945 WAC

Emergency rules to reduce burdens on patients and practitioners prescribing Schedule II substances during the coronavirus disease 2019 (COVID-19) pandemic were refiled on July 2, 2021, under Washington State Register (WSR) 21-14-059. They are effective immediately and will remain in effect for 120 days.

The emergency rule amends Washington Administrative Code (WAC) 246-945-010:

- It increases the duration of time a practitioner has to deliver a signed prescription – when authorizing an emergency prescription of a Schedule II substance to the pharmacy – from seven to 15 days.
- It redefines what is a “signed prescription.” This emergency rule has already been in effect but was refiled to alleviate burdens on practitioners during the ongoing COVID-19 pandemic.
- It aligns with the position taken by Drug Enforcement Administration (DEA) regarding issuance of oral Schedule II prescriptions due to the nationwide public health emergency declared by the United States Secretary of Health and Human Services.

View the Commission’s [Plan-19](#) for information on Commission guidance, frequently asked questions (FAQs), and more regarding COVID-19. If you have questions, please email the Commission at COVID19.PQAC@doh.wa.gov.

No. 1382 Epidiolex Removed From Schedule V

On July 2, 2021, the Commission refiled emergency rules under WSR 21-14-061 to delete Epidiolex® from the list of Schedule V controlled substances (CS) in WAC 246-945-056 to align with federal law. Epidiolex is no longer considered a CS.

This emergency rule was already in effect but was refiled while permanent rulemaking is in progress. The statement of inquiry (CR-101) for permanent rules was filed on November 10, 2020, under WSR 20-23-027, to remove Epidiolex from Schedule V.

Epidiolex is a Food and Drug Administration (FDA)-approved cannabidiol with less than 0.3% tetrahydrocannabinol (THC), used to treat some seizure disorders. Declassifying Epidiolex as a Schedule V CS aligns Washington State rule with the enactment of the Agricultural Improvement Act of 2018. The act also:

- excluded hemp from Schedule I in the Controlled Substances Act and removed it from the definition of marijuana; and
- declassified hemp products with not more than 0.3% delta-9 THC on a dry-weight basis.

DEA also completed rulemaking to remove Epidiolex from Schedule V in August 2020.

No. 1383 FAQs – Updates

Q. Does an individual’s (or business’) acquisition of more than 50% of the shares in a pharmacy corporation trigger the Commission’s “change of ownership” process?

A. Yes. According to statute and rule, pharmacies should immediately notify the Commission and comply with the Commission’s “change of ownership” process if an individual or business acquires more than 50% of the shares in a pharmacy corporation (such as through a stock sale [see [RCW 18.64.043\(3\)](#), [WAC 246-945-230\(3\)\(c\)](#), and [WAC 246-907-040\(2\)](#)]). If there are other change of ownership questions, please contact wspqac@doh.wa.gov.

Q. Can an unfilled original electronic prescription of a Schedule II CS be transferred?

A. On August 27, 2020, the Commission reaffirmed its position, consistent with DEA, of permitting the transfer of an unfilled original electronic prescription for a Schedule II CS from one DEA-registered pharmacy to another DEA-registered pharmacy. The Commission encourages pharmacies that engage in the transfer of any unfilled original electronic prescription of a Schedule II CS to maintain an audit trail as defined in [WAC 246-945-001\(6\)](#).

Q. Under the legislature’s new compounding law (SHB 1445), should I continue to follow US Pharmacopeia (USP) Chapter <797> requirements when diluting a reconstituted sterile medication, such as Remicade®, according to FDA-approved labeling?

A. Yes, the new compounding law exempts nonsterile and sterile products that only require reconstitution and mixing according to FDA-approved labeling. Further manipulation of a reconstituted product, such as dilution, should be an indicator that compounding is occurring and USP Chapter <797> should be followed, per [RCW 18.64.270\(2\)](#). Additionally, under the new pharmacy standard of care rules, the Commission expects pharmacists to utilize their professional judgment in the best interest of the patient. Please note: This law became effective on July 25, 2021.

No. 1384 Pharmacy Commission Recruits Members for 2022

The Washington State Department of Health (DOH) Health Systems Quality Assurance (HSQA) Division is accepting applications to fill upcoming vacancies on the Commission for 2022.

HSQA is looking for public-spirited people willing to study the issues and make decisions in the public’s best interest. Health profession boards, commissions, and committees operate under legislative mandate to “protect the health and safety of the public” and “promote the welfare of the state by regulating the competency and quality of health care providers under their authority.”

The governor's office and DOH seek diversity in board and Commission members. The Commission recognizes the value variety brings in understanding and serving the people of Washington State. The Commission needs candidates with diverse backgrounds and those who provide geographic representation throughout the state.

To qualify for a position on the Commission, a candidate must be a citizen of the US and a resident of Washington State. In addition:

- A public member must be a member of the general public who is not affiliated with any aspect of pharmacy
- A pharmacist member must be licensed in Washington State for a period of at least five consecutive years immediately preceding appointment and continue to be a duly licensed pharmacist
- A pharmacy technician member must hold a pharmacy technician certification in Washington State

If you are interested in applying for an appointment to the Commission, please visit its website and complete the governor-appointed [application](#) (please select that you are applying for the Pharmacy Commission). Submit your application, along with a current résumé, by November 1, 2021. You can find a description of the roles and responsibilities to serve on the Commission on the Commission's information web page.

If you have any questions, please contact Joanne Miller at 360/236-4834 or wspqac@doh.wa.gov. Please note: If you already [submitted an application](#) for 2021, there is no need to resubmit an application for the 2022 recruitment cycle.

No. 1385 Report Prescription Fraud Alerts Through New Pilot Program

To address the epidemic of prescription drug overdose, abuse, and misuse, the DOH has implemented several strategies, including pain management rules and a prescription monitoring program (PMP). The Commission often hears from health care providers aware of fraudulent prescriptions through forgery or theft of prescription pads. To address this, the DOH has initiated a pilot program for reporting and collecting potential fraudulent prescription information.

Health care providers may submit a [web-based reporting form](#) with the specific prescription information. The DOH and the Commission will make the information available to Washington pharmacies registered with the Commission's public listserv, on its web page, and through the [PMP system](#). The Commission hopes that this tool will help to prevent additional fraudulent prescriptions from being filled.

Visit the [Pharmacy Rx Fraud Listserv](#) page to subscribe to receive the [Rx Fraud Alert Report \(PDF\)](#). Simply select the green "subscribe" button at the bottom of the page.

No. 1386 Kudos for a Pharmacist of Excellence

The Commission would like to recognize Kylie Gordash, RPh, of Port Angeles, WA, as a pharmacist of excellence. The Commission recently received the following note from one of his patients:

With 83 years of life experience, I recognize excellence when I see it, and it's time you recognize

it too. Mr Kylie Gordash is a pharmacist in Safeway Store #1922 in Port Angeles and he's been serving us for at least six years. If our Washington State Board has a "Recognition for excellence" Award, they should seriously reward Mr Gordash for representing your profession in an outstanding and exceptional manner.

He is everything a pharmacist should be, a model of professionalism, very focused on accuracy, a friendly, concise communicator, an asset to our community, a team leader, and basically a fine American. Recognition is overdue.

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No. 1387 The Commission Announces Updated Subcommittees/New Innovative Goals

During the July 2021 Commission meeting, the Commission updated its **subcommittees** to include current priorities and goals of the Commission.



The Washington State Pharmacy Quality Assurance Commission News is published by the Washington State Pharmacy Quality Assurance Commission and the National Association of Boards of Pharmacy Foundation® (NABPF®) to promote compliance of pharmacy and drug law. The opinions and views expressed in this publication do not necessarily reflect the official views, opinions, or policies of NABPF or the Board unless expressly so stated.

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