

WASHINGTON STATE PHARMACY QUALITY ASSURANCE COMMISSION

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

Pharmacy Closures and Prescription Transfers

On **May 5, 2025**, Rite Aid Corporation filed for bankruptcy, which will result in pharmacy closures nationwide. The Washington State Pharmacy Quality Assurance Commission knows that Washington will not be an exception to these closures and anticipates changes to Washington's pharmacy sector.

The Commission, in collaboration with interested parties, is monitoring the Rite Aid bankruptcy proceedings and anticipated pharmacy closures in the state. The Commission strongly encourages pharmacies to consider if they may be impacted by Rite Aid closures in their respective areas and, if so, to begin taking steps to ensure continuity of care for patients.

The Commission also reminds licensees that **Washington Administrative Code (WAC) 246-945-345** and **WAC 246-945-346** establish provisions for prescription transfers of non-controlled and controlled substance prescriptions. These rules require, among other things, that pharmacies transfer prescriptions within three business days of receiving the request, or within a time frame that does not adversely impact the provision of medication therapy (whichever occurs first).

The Commission recently completed rulemaking on **WAC 246-945-480** Facility reporting requirements to update the requirements for when a facility permanently closes. These updates include the following:

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(cont)

(b) Provide notification to customers beginning no later than 30 calendar days prior to closing, which includes the last day the pharmacy will be open and the last day a transfer may be initiated. The notification shall include:

(i) Posting a closing notice in a conspicuous place in the public area of the pharmacy;

(ii) Informing patients of the closure during prescription pick-up or delivery, including a notice with dispensed prescriptions informing patients of their right to request a prescription transfer, if applicable; and

(iii) Public notice in at least one legal newspaper of general circulation in the area

served by the pharmacy that meets the qualifications of [Revised Code of Washington (RCW) 65.16.020]. The public notice must appear in both the print and digital versions of the legal newspaper, if available.

Guidance Document: Pharmacy Closures and Prescription Transfers of Non-Controlled Legend Drugs Under WAC 246-945-345

At the special meeting on May 30, 2025, the Commission approved a guidance document, *Pharmacy Closures and Prescription Transfers*

of Noncontrolled Legend Drugs Under WAC 246-945-345. This guidance document is effective until November 6, 2025.

The document is posted on the Commission's [Policies, Procedures, and Guidelines web page](#).

DOH Policy Statement: Enforcement Discretion to Assist With Prescription Transfers Due to Impacts of Rite Aid and Bartell Drugs Closures

On June 5, 2025, the Washington State Department of Health (DOH) filed policy statement HSQA-25-01 under [Washington State Register \(WSR\) 25-13-006](#). The policy states that the secretary of health will exercise enforcement discretion to permit pharmacists

and pharmacy technicians to practice in Washington without an active Washington State credential or certification under Chapters 18.130, 18.64, or 18.64A RCW, for the sole purpose of assisting with prescription transfers due to the closures

of Rite Aid and Bartell Drugs pharmacies in Washington. The policy statement is effective until August 31, 2025. Please see the statement on the Commission's [Policies, Procedures, and Guidelines web page](#) for additional information.

Uniform Facility Enforcement Framework (CR-102) Filing

The Commission filed a rules proposal package (CR-102) on May 6, 2025, under [WSR 25-10-089](#). The rule proposes implementing a uniform process for fining pharmaceutical firms in a new

section of WAC 246-945-007 Civil Fines. The proposed rules implement Engrossed Substitute Senate Bill 5271 (Chapter 121, Laws of 2024). At the June 26, 2025 business meeting, the

Commission held a public hearing and tasked staff with filing a CR-103P Rules Adoption package for the adopted Uniform Facility Enforcement Framework for Pharmacy rule language.

Incorporation by Reference of DSCSA (CR-102) Filing

The Commission filed a rules proposal package (CR-102) on May 19, 2025, under [WSR 25-11-064](#). The rule proposes creating a new section in Chapter 246-945 WAC to incorporate by reference sections of the federal Drug Supply

Chain Security Act (DSCSA). This proposal follows 2023 updates by Food and Drug Administration to DSCSA and will align the Commission's regulatory language with the updates to the federal statutory language of the act. The

Commission conducted a public hearing following the CR-102 filing and adopted the proposed rule at the hearing, tasking staff with filing a CR-103P Rules Adoption package for the approved incorporation of DSCSA.

Inspection Requirements for Modifications or Remodels (CR-102) Filing

The Commission filed a rules proposal package (CR-102) on June 5, 2025, under [WSR 25-13-005](#). The rule proposes to amend WAC 246-945-230 to clarify circumstances necessitating

a remodel inspection due to pharmaceutical facility modifications or remodels. The Commission will hold a public hearing on the CR-102 on August 14, 2025, at 10:30 AM

during its regularly scheduled business meeting. The deadline for submitting written comments to the DOH [Rules Comment web page](#) was July 31, 2025.



Nonresident Pharmacy: List of Approved Inspection Programs Directive

The Commission updated its directive titled [Nonresident Pharmacy: List of Approved Inspection Programs](#) at the May 22, 2025 business meeting.

This updated directive took effect on **July 1, 2025**. The directive is located on the Commission's [Policies, Procedures, and Guidelines web page](#).

Pharmacy Practice FAQ: What to Know About Selling and Distributing Sterile Syringes and Needles

The Commission approved a pharmacy practice-related **frequently asked question (FAQ)** section on a pharmacist's ability to distribute sterile hypodermic syringes and needles without a prescription at the May 22, 2025 business meeting. The FAQ reads:

May a pharmacy sell and distribute sterile hypodermic syringes and needles without a prescription?

Washington law permits a pharmacist to distribute sterile hypodermic syringes or needles without a prescription, including hypodermic syringes or needles used for subcutaneous or intramuscular injections (**RCW 69.50.4121(3)**).

Washington law also requires that a pharmacist who sells a hypodermic needle or syringe at retail "shall satisfy himself or

herself that the device will be used for the legal use intended" (**RCW 70.115.050**). The Commission has previously determined, and continues to maintain, that the sale of sterile hypodermic syringes and needles for the purpose of reducing the transmission of blood-borne diseases is a legal use under RCW 70.115.050.

Pharmacist Prescriptive Authority Sunrise Review – Update

The DOH is currently completing a sunrise review on pharmacist prescriptive authority.

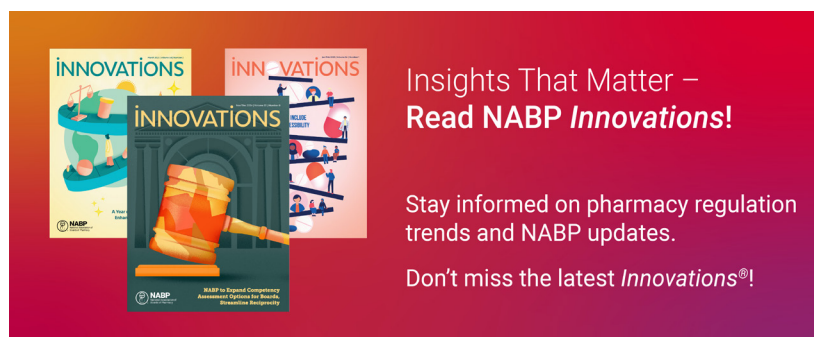
- The written public comment period has ended, and the

department has posted the **written comments** received to its website.

- A public comment meeting was held on May 14, 2025.

- Updates on the process and applicable documents are available **here**.

If you have any questions, please contact **sunrise@doh.wa.gov**.



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