

# WASHINGTON STATE PHARMACY QUALITY ASSURANCE COMMISSION

*Newsletter to Promote Pharmacy  
and Drug Law Compliance.*

## Disciplinary Action Reporting Time Frames for Pharmaceutical Firms (CR-101) Filing

The Washington State Pharmacy Quality Assurance Commission filed a rules inquiry package (CR-101) on July 23, 2025, under [Washington State Register \(WSR\) 25-15-162](#). The rule

considers amending Washington Administrative Code (WAC) 246-945-231 to add a time frame for pharmaceutical firms to report disciplinary action to the Commission.

## Expanding Types of Medication Assistance (CR-101) Filing

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The Commission filed a rules inquiry package (CR-101) on July 30, 2025, under [WSR 25-16-045](#). The rule considers amending WAC 246-945-714 to include additional actions that may be

used by non-practitioners in the provision of medication assistance to implement [Substitute House Bill 1720](#) (Chapter 26, Laws of 2025).



## Suspicious Orders and Zero Reports (CR-102) Filing

The Commission filed a rules proposal package (CR-102) on June 30, 2025, under [WSR 25-14-077](#). The rule proposes to amend WAC 246-945-585 and WAC 246-

945-590 to clarify expectations for wholesalers submitting suspicious orders and zero reports to the Commission.

The Commission held a public hearing on the CR-102 on August 14, 2025, during its regular business meeting.

## Alternate Distribution Models (CR-102) Filing and Public Comment Period

The Commission filed a rules proposal package (CR-102) on August 29, 2025, under [WSR 25-18-070](#), creating a new section, WAC 246-945-416 Alternate Distribution Models. The proposed

rule establishes standards for how alternate distribution models for filled medications may be used by facilities regulated by the Commission.

The Commission held a public hearing on October 16, 2025, during its regular business meeting.

## Uniform Facility Enforcement Framework for Pharmacy (CR-103P) Filing

The Commission filed a rules adoption package (CR-103P) on August 20, 2025, under [WSR 25-17-089](#). The adopted rule establishes a process for fining pharmaceutical

firms in relation to the operation size of the licensee and the severity and scope of noncompliance with a state, federal, or foreign authority statute or rule. This rulemaking

was required by [Engrossed Substitute Senate Bill 5271](#) (Chapter 121, Laws of 2024). The rule took effect on September 20, 2025.

## DSCSA Incorporation by Reference (CR-103P) Filing

On September 5, 2025, the Commission filed a rules adoption package (CR-103P) under [WSR 25-19-024](#), creating a new section of WAC 246-945-003 Drug Supply Chain Security Act. The rule took effect on October 6, 2025.

Please refer to the links below to learn more about the Commission's optional self-inspection worksheet and guidance related to the Drug Supply Chain Security Act (DSCSA). This information is also on the Commission's [Inspections web page](#).

Optional DSCSA Resources:

- [Optional DSCSA Self-Inspection Worksheet \(Word\)](#)
- [Optional DSCSA Self-Inspection Worksheet \(pdf\)](#)
- [DSCSA Guidance Document \(pdf\)](#)

# DOH Issues a COVID-19 Vaccine Standing Order and FAQs for Public and Health Care Providers

On September 4, 2025, the Washington State Department of Health (DOH) issued a [COVID-19 Vaccine Standing Order](#), along with frequently asked questions (FAQs), for public and health care provider audiences. Please see the standing order below and FAQs on [DOH's Standing Orders web page](#) for additional information.

## Guidance for Pharmacies and Pharmacists on Prescribing and Administering the COVID-19 Vaccine

Commission staff has received several questions related to the prescribing and administration of COVID-19 vaccines. The guidance below is aimed at informing pharmacies and pharmacists of three possible mechanisms by which a pharmacist may administer a COVID-19 vaccine and identifies some key differences between them. The Commission does not endorse one mechanism over another but defers to pharmacists and pharmacies to determine the appropriate mechanism applicable to their practice settings.

### Statewide Standing Order

On September 4, 2025, the DOH issued a [statewide COVID-19 Vaccine Standing Order](#) (Statewide Standing Order). The Statewide Standing Order was issued under the secretary of health's authority in Revised Code of Washington 43.70.183 and authorizes health care providers, including pharmacists, to administer COVID-19 vaccines consistent with applicable law and the terms of the standing order.

Pharmacists who use the Statewide Standing Order to administer COVID-19 vaccines must follow the terms of the order, including identifying State Health Officer Tao Sheng Kwan-Gett, MPH, MD, as the prescriber.

More information about the Statewide Standing Order can be found on [DOH's Standing Orders web page](#).

### Collaborative Drug Therapy Agreements

A Collaborative Drug Therapy Agreement (CDTA) is a set of written guidelines or protocols that establish the scope of prescriptive authority for a pharmacist. A pharmacist who has established a CDTA with a prescriber is authorized to prescribe or order drug or biological products in accordance with the terms of the CDTA.

Pharmacists and prescribers can establish a CDTA, defining the guidelines under which a pharmacist can prescribe or order the COVID-19 vaccine. This process is separate and apart from the Statewide Standing Order. In other words, a CDTA provides an alternative mechanism to the Statewide Standing Order for a pharmacist to administer the COVID-19 vaccine.

More information on CDTAs can be found on the Commission's [web page](#).

### Prescriptions Written by Other Practitioners

A third possible mechanism for a pharmacist to administer a COVID-19 vaccine is if a patient is prescribed the COVID-19 vaccine by a practitioner and a copy of that prescription is presented or sent to the pharmacy. The Statewide Standing Order does not replace or amend the ability of a patient to obtain a prescription from their provider for the COVID-19 vaccine.

# Guidance for Pharmacies and Pharmacists on Prescribing and Administering the COVID-19 Vaccine

(cont)

## Summary

Whether administering a vaccine under the Statewide Standing Order, a CDTA, or a prescription, pharmacists must ensure that administration is consistent with the provision of safe and appropriate medication therapy

(WAC 246-945-305(2)). In addition, pharmacies are subject to a legal duty to deliver lawfully prescribed drugs and devices (WAC 246-945-415(2)).

Please see the graphic below to summarize this information:

	Statewide Standing Order	CDTA	Prescription
What is the Authorizing Law?	RCW 43.70.183	RCW 18.64.011(32) , and the Legend Drug Act, RCW 69.41.	The prescriber's practice act, and the Legend Drug Act, RCW 69.41.
Who is the Prescriber?	State Health Officer (Dr. Kwan-Gett, M.D., M.P.H.)	The pharmacist who is a party to the CDTA.	The practitioner identified on the prescription as the prescriber.
Are There Unique Prescribing Limitations?	Pharmacists should comply with the terms and conditions of the Statewide Standing Order	Pharmacists should comply with the terms and conditions of the CDTA.	The prescription must be written by a practitioner with the necessary prescriptive authority.

## Scammers Continue to Target Licensees

Licensees continue to report being victimized by scam callers or emailers claiming to represent the Commission or another government agency. Neither the DOH nor the Commission will contact licensees via phone or email to threaten a credential holder.

- If you question the validity of the call or email, please hang up and contact the Commission directly at 360/236-4946.
- If you have any doubts or questions about someone claiming to represent Drug Enforcement

Administration (DEA) or the Federal Bureau of Investigation (FBI), report the call to [DEA's Extortion Scam reporting program](#) or the [FBI's Internet Crime Complaint Center](#).

- If a scam caller's phone number appears to be a Commission phone number, report the scam using the [Federal Communications Commission's consumer complaint form](#).

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