

WASHINGTON STATE PHARMACY QUALITY ASSURANCE COMMISSION

*Newsletter to Promote Pharmacy
and Drug Law Compliance.*

Tamper-Resistant Prescription Pads and Paper (CR-101) Filing

The Washington State Pharmacy Quality Assurance Commission (Commission) filed a rules inquiry package (CR-101) on October 15, 2025, under [Washington State Register \(WSR\) 25-21-079](#). The rule considers establishing a new section(s) in [Chapter 246-](#)

[945 Washington Administrative Code \(WAC\)](#) and amending [WAC 246-945-010](#) to regulate tamper-resistant prescription pads and paper information, including industry-recognized security features and their approval process.

Clarifying Ancillary Utilization Plans (CR-101) Filing

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On October 24, 2025, the Commission filed a rules inquiry package (CR-101) under [WSR 25-22-008](#). The Commission is considering amending [WAC 246-945-410](#) to clarify that only pharmacies may submit an

ancillary utilization plan, per [Revised Code of Washington \(RCW\) 18.64A.040](#) and [RCW 18.64A.060](#), for approval by the Commission to utilize pharmacy ancillary personnel as defined in [RCW 18.64A.010\(5\)](#).

Accessible Labeling Program Refinement (CR-101) Filing

On November 18, 2025, the Commission filed a rules inquiry package (CR-101) under [WSR 25-23-064](#). The Commission is considering amending WACs [246-](#)

[945-015](#), [246-945-026](#), [246-945-027](#), [246-945-028](#), and [246-945-029](#) to refine compliance requirements for the accessible prescription labeling program established

following the filing of a CR-103p on January 22, 2025, under [WSR 25-04-003](#). A rules workshop was held at the regular business meeting on December 4, 2025.

Disciplinary Action Reporting Time Frames (CR-102) Filing

On October 7, 2025, the Commission filed a rules proposal package (CR-102) under [WSR 25-21-027](#). The rule proposes to

amend [WAC 246-945-231](#) to clarify the time frame for pharmaceutical firms to report disciplinary action to the Commission. A public

hearing was held at the regular business meeting on December 4, 2025.

Medication Assistance Expansion (CR-102) Filing

On November 18, 2025, the Commission filed a rules proposal package (CR-102) under [WSR 25-23-066](#). The rule proposes to amend [WAC 246-945-714](#) to update

duties allowed for nonpractitioners providing medication assistance services. The proposed changes mirror those made to state statute following the passage of [Substitute](#)

[House Bill 1720 \(Chapter 26, Laws of 2025\)](#). The Commission will hold a public hearing on the proposed rule on February 5, 2026.

Inspection Requirements for Modifications and Remodels (CR-103P) Filing

A rules adoption package (CR-103P) was filed by the Commission on October 3, 2025, under [WSR 25-](#)

[21-016](#). The rule amends [WAC 246-945-230](#) to clarify circumstances necessitating a remodel inspection

due to pharmaceutical facility modifications or remodels. The rule took effect on November 3, 2025.

Suspicious Orders and Zero Reports (CR-103P) Filing

The Commission filed a rules adoption package (CR-103P) on October 3, 2025, under [WSR 25-21-014](#). The rule amends [WAC 246-945-585](#) and [WAC 246-945-590](#) to clarify expectations for wholesalers submitting suspicious orders and zero reports to the

Commission. The rule removes the requirement for wholesalers to submit zero reports to the Commission and amends the requirement for wholesalers to only submit suspicious order reports for suspicious orders that resulted in customer termination

or a refusal to onboard. These reports must be submitted electronically to the Commission at PQACSuspiciousOrders@doh.wa.gov in a readable format that is accessible to the Commission. The rules took effect on November 3, 2025.



Pharmacist Prescriptive Authority Sunrise Report Submitted to Legislature

At the request of the Washington State Senate Health and Long-Term Care Committee, the Washington Department of Health (DOH) reviewed a proposal to increase the pharmacist scope of practice to assess whether

it meets the sunrise criteria in [RCW 18.120.010](#). The request granted the Commission the authority to regulate licensed pharmacist prescribing outside of a collaborative agreement.

The department submitted its report with recommendations to the legislature: [Sunrise web page](#). Here is a direct link to the report: [Sunrise Review: Pharmacist 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 DOH nor the Commission will contact licensees via telephone or email to threaten a credential holder. If you question the validity of the call or email, please contact the Commission directly at 360/236-4946.

Techniques used by these individuals include:

- A caller claims a licensee is under investigation by the Commission, DOH, Drug Enforcement Administration (DEA), Federal Bureau of Investigation (FBI), or another government agency. In some cases, the caller also warns of discipline unless the licensee pays a “fine.”

- A caller warns a licensee not to report the call to anyone “or else you will jeopardize the investigation.”
- A caller requests a licensee’s cell phone number.
- A caller gives a fake call-back number.
- A caller spoofs the Commission’s phone number. This happens when your caller ID screen falsely shows that an incoming call is from the Commission.

These calls are scams! In many cases, callers are attempting to extort money or elicit sensitive information – eg, license numbers, DEA registration numbers, etc – from licensees.

What can you do to protect yourself? Licensee security is important to the Commission.

Be aware of these tips:

- If you have any doubts or questions about someone claiming to represent the Commission, telephone the Commission at 360/236-4946.
- If you have any doubts or questions about someone claiming to represent DEA or the 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](#).

RxFraud Alerts

Commission staff members continue to get reports of possible fraudulent prescriptions being submitted to Washington State pharmacies. If you or your

coworkers suspect a fraudulent prescription, please [complete this form](#) with any information you may have. You may also email RxFraudAlert@doh.wa.gov. To

view the full report, please visit our [RxFraud Alert page](#). You may also notify [DEA in Seattle](#).

Unexpired Prescription Drugs Donation Program

The Commission has a rule, [WAC 246-945-488](#), for the purpose of establishing an unexpired prescription drug donation program.

The unexpired prescription drugs donation program is optional. [WAC 246-945-488](#) adopts the required conditions for donated prescription drugs outlined in [Chapter 69.70 RCW](#), but it

also adds a requirement that participating pharmacies must submit an additional form to the Commission as notification of participation in the program.

- [Participation notification form](#)
- [Participating facilities list](#)

When donating medications under the unexpired prescription drug donation program, the

participating pharmacy must complete a drug donation form that must accompany the donated medications.

- [Drug donation form \(pdf\)](#)

For more information, please visit the [Unexpired Prescription Drugs Donation Program](#).

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