



STATE OF WASHINGTON
Pharmacy Quality Assurance Commission

*PO Box 47852 • Olympia, Washington 98504-7852
Tel: 360-236-4946 • TTY Relay: 800-833-6384*

Business Meeting – Meeting Minutes

August 27, 2020

9:00 AM (Open Session)

Convene: Vice Chair, Teri Ferreira called the meeting to order August 27, 2020 at 9:01 a.m.

Commission Members:

Tim Lynch, Commission Chair
Teri Ferreira, Commission Vice Chair
Jerrie Allard, Public Member
Bonnie Bush, Public Member
Olgy Diaz, Public Member
Judy Guenther, Public Member
Ken Kenyon, PharmD, BCPS
Craig Ritchie, RPh, JD
Sepi Soleimanpour, RPh, MBA-HA
Uyen Thorstensen, CPhT
Kat Wolf Khatchatourin, PharmD, MBA

ABSENT

Patrick Gallaher, BS, BPharm, MBA, MPH

Staff Members:

Chris Gerard, AAG
Lauren Lyles-Stolz, Executive Director,
Pharmacy Commission
Christie Strouse, Deputy Director, Pharmacy
Commission
Doreen Beebe, Program Manager, Pharmacy
Commission
Lindsay Trant, Rules and Legislative
Coordinator, Pharmacy Commission
Marlee O'Neill, Deputy Director, Office of
Investigation and Legal Services
Cori N. Tarzwell, staff member
Amy L Robertson, Administrative Assistant,
Pharmacy Commission

- 1.1 **Meeting Agenda Approval -- MOTION:** Craig Ritchie moved to approve the agenda as written; Jerrie Allard, second; motion carried.
- 2.1 Lauren Lyles-Stolz briefed the Commission on the implementation of WAC 246-945-585 and the obstacles/differences that may necessitate delayed enforcement of all requirements detailed in the WAC.

Suspicious Orders – In addition to PQAC's development of forms/reports for WAC 246-945-585, the NABP and DEA are working on a national reporting system (DEA, SORS and ARCOS. Leah Lindahl (Healthcare Distribution Alliance, "HDA") suggests/requests a 30-60 day adjustment period for the wholesalers to integrate their systems once a system is approved.

MOTION: Craig Ritchie motioned that PQAC delay enforcement of the suspicious order reporting until the October business meeting. Also, PQAC would not find licensees deficient or take enforcement action against its licensees for failure to comply with WAC

246-945-585 (Suspicious Orders and Due Diligence Rule). Ken Kenyon, second. Motion carried.

- 2.2 Lauren Lyles-Stolz briefed the Commission on the issues of applying **Statement of Deficiency (SOD) and Plan of Correction (POC)** methodology according to WAC 246-945-005. Currently, this only applies to “pharmaceutical firms,” not all license types under the Commission’s authority. Non-traditional firms e.g., controlled substance registrants, do not fit this category.

The Commission also concurred **annual self-inspection forms do not need to be developed for non-traditional firms.**

MOTION: Craig Ritchie moved we apply the SOD and POC methodology to all registrants and develop a written statement outlining the Commission’s position. Bonnie Bush, second. Motion carries.

2.3 **Prescription Transfer Rules-**

Lauren Lyles-Stolz led the following discussions: [Tim enters commission meeting]
The Commission determined:

1. The Commission clarified transferring by electronic means is defined as using an electronic device (e.g., facsimile) to transmit a prescription. Entering a written prescription into a database or other electronic device does not make it an electronic prescription.
2. The Commission clarified “emergency” will be determined by the pharmacist to rely on his/her professional judgement to ensure the best interests of the patient.
3. The commission considers the function of transferring a non-controlled prescription legend drugs by electronic means to be a nondiscretionary function delegable to a pharmacy technician.

MOTION: Tim Lynch motioned that it is permissible for a pharmacy technician to transfer a non-controlled legend drug prescriptions under the immediate supervision of a pharmacist by electronic means (including facsimile), this excludes verbal (or oral) transfers as they cannot be delegated. Uyen Thorstensen or Bonnie Bush, seconded. Motion carried.

- 2.4 **Euthanasia Training Program- MOTION:** Bonnie Bush motioned that the Pharmacy Commission adopt the provisions of our former rules WAC 246-886-040 as guidance for programs that wish to develop euthanasia programs and using that document to evaluate programs when they submit for approval. Second, Craig Ritchie. Motion carried.

3. **Summary of Meeting Action Items**

1. Work with Leah Lindahl (Healthcare Distribution Alliance, “HDA”) and monitor the implementation of the DEA’s SORS system and research the status of NABP’s potential reporting system for implementation of WAC 246-945-585 Suspicious Orders to discuss at the October meeting.
2. Create FAQ and SOD/POC methodology application to all registrants under the Commission’s jurisdiction. Ensure all pharmacy inspectors are informed of this update.
3. Create FAQ – the pharmacist will use professional judgement in determining an emergency situation under the new rules for transferring a prescription. Also, the pharmacy technicians will be able to transfer non-controlled prescription drugs via electronic means. The Commission will also maintain the DEA’s policy for unfilled original prescriptions of CII transfers.
4. Create a guidance document outlining the former WAC for euthanasia training programs.

There being no further business, the Commission meeting adjourned at 11:08 am

Respectfully Submitted by:
Amy Robertson, Administrative Assistant

Approval October 1, 2020

A handwritten signature in black ink, appearing to read "Tim Lynch".

Tim Lynch, Chair
Washington State Pharmacy Quality Assurance Commission