

PMP Workshop Notes

March 19, 2024

WAC	Description	Notes
<p>WAC 246-470-030 Data submission requirements for dispensers.</p>	<p>(1) A dispenser shall provide to the department the dispensing information required by RCW 70.225.020 and this section for all scheduled II, III, IV, and V controlled substances and for drugs identified by the pharmacy quality assurance commission under WAC 246-470-020. Only drugs dispensed and delivered for more than one day use must be reported.</p>	<p>Question: What's the difference between "dispense" and "deliver"? Is this when a "prescription is prepared for delivery" or "patient to pick-up"?</p> <ul style="list-style-type: none"> • Answer: The intent is to capture when the prescription is dispensed and when patient pick-up the prescription. <p>Comment: In order to understand this change, we need to look at what other states have done. It would be a significant workflow change in software. I've reached out to some stakeholders. I still need to do more, and I'll provide written comments. My assumption was that it was trying to rectify the tracking differences.</p> <ul style="list-style-type: none"> • Answer: Thank you for your comments DOH will note it and follow up appropriately. Please provide any additional comments you may have. <p>Comments: Question to interested party - Is the pharmacy association okay with this change because you said it would be a significant workload? Are the systems geared up right now? I think this is a positive change and understand the need for this change but right now the software systems aren't set up for that. I also know that some other states have moved in this direction. It may be something that the software can accommodate easier than it used to be able to. I want to look into the dispensing systems in use.</p>
<p>WAC 246-470-030 Data submission</p>	<p>(3) Submitting data. A dispenser shall submit data to the department electronically, as soon as readily available, but no later than one business day from</p>	<p>No questions or comments.</p>

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<p>requirements for dispensers.</p>	<p>the date of dispensing and delivering a drug, and in the format required by the department. When the dispenser has not dispensed and delivered any drugs during a business day which require reporting, then within seven days the dispenser shall report that no drugs requiring reporting were dispensed and delivered. The notification shall be in a format established by the department.</p> <p>(a) A dispenser shall submit ((for each dispensing)) the following information ((and)) for each drug dispensed and delivered as well as any additional information required by the department:</p> <ul style="list-style-type: none">(ii) Name of the patient for whom the prescription is ordered including first name, middle initial, last name, and generational suffixes, if any;(iii) Patient date of birth;(iv) Patient address;(v) Patient gender and species code;(vi) Drug dispensed and delivered;(vii) Date of dispensing and delivering;(viii) Quantity and days supply dispensed and delivered;(ix) Refill and partial fill information;(x) Prescriber identifiers including the National Provider Identifier and the Drug Enforcement Administration number including any suffix used;(xi) Prescription issued date;(xii) Dispenser identifiers including the Drug Enforcement Administration number and the National Provider Identifier;(xiii) Prescription fill date and number;(xiv) Source of payment indicated by one of the following:	
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	<p>(A) Private pay (cash, change, credit card, check); (B) Medicaid; (C) Medicare; (D) Commercial insurance; (E) Military installations and veterans affairs; (F) Workers compensation; (G) Indian nations; (H) Other; (xv) When practicable, the name of the person picking up or dropping off the prescription as verified by valid photographic identification; and (xvi) The prescriber's and dispenser's business phone numbers.</p>	
<p>WAC 246-470-050 Local health officer, pharmacist, prescriber or other health care practitioner and medical test site access to information from the program.</p>	<p>(1)(b) A pharmacist, prescriber, or licensed health care practitioner authorized by a prescriber or pharmacist may obtain prescription monitoring information relating to their patients, for the purpose of providing medical or pharmaceutical care or for the purpose of reviewing provider prescription history.</p>	<p>Question: It sounds like this provider and the prescribers already have this ability it's just this is putting into WAC to make that clear, correct?</p> <ul style="list-style-type: none"> • Answer: Correct. <p>Question: I wondered structurally might you need a subsection. The reason is, I'm not looking to exclude the pharmacist. Sometimes pharmacists are prescribers but I'm wondering whether this applies to pharmacists when they're not a prescriber. That's why I'm wondering if it needs its own subsection, under (c).</p> <ul style="list-style-type: none"> • Answer: Thank you. We will look into this. <p>Question: What is the timeline for the proposed changes?</p> <ul style="list-style-type: none"> • Answer: We do not have a legislative deadline. These changes are in response to an audit from the State Auditor's Office. It was determined the

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		<p>terms needed to be clarified. Standard rulemaking takes 12-18 months from start to finish.</p> <p>Comment: I just wanted to clarify, that a pharmacist, prescriber, or licensed health care practitioner are able to look at their past history of prescriptions the only thing that they need to make sure is that they have their DEA attached to their account and they can easily do that by calling and having that put on their account and then they can see their prescription history.</p>
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