



Pharmacy Quality Assurance Commission

Guidance Document

Title:	Ancillary Utilization Plans and the Administration of Drugs and Devices
Reference:	RCW 18.64A.010(6), RCW 18.64A.030, RCW 18.64A.060, RCW 18.64.011
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Effective Date:	May 2, 2024
Supersedes:	August 28, 2020 version
Approved:	Kenneth Kenyon, Chair Pharmacy Quality Assurance Commission

Summary

Pharmacy technicians or pharmacy assistants enrolled in a commission-approved Pharmacy Technician Education and Training Program (pharmacy technicians-in-training) may provide administration of medications or devices under the immediate supervision of a pharmacist and if the Pharmacy Quality Assurance Commission (commission) has authorized the pharmacy technician or pharmacy technician-in-training to administer medications or devices by approving an ancillary personnel utilization plan (AUP).

Pharmacies wishing to use pharmacy technicians or pharmacy technicians-in-training to administer medications or devices should submit an AUP that meets the standards identified in this guidance document. A failure to meet the standards identified in this guidance document may result in rejection or modification of the proposed AUP. RCW 18.64A.060.

This guidance document does not allow a pharmacy technician or pharmacy technician-in-training to engage in an assessment or discussion of the clinical appropriateness of a medication or device for a patient prior to administration.

Background

In December 2019, the commission examined whether current law allows a pharmacy technician to administer medications or devices under the immediate supervision of a pharmacist. Based on its examination, the commission determined that pharmacy technicians may provide administration of medications or devices under the immediate supervision of a pharmacist if the commission has authorized the pharmacy technician to administer medications or devices by approving an AUP.

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Pharmacy technicians may perform nondiscretionary functions associated with the practice of pharmacy under the immediate supervision and control of a licensed pharmacist and subject to restrictions adopted in rule by the commission. RCW 18.64A.010(6) and RCW 18.64A.030(1). In addition, pharmacy technicians may only be utilized by pharmacists to the extent the pharmacy has an AUP approved by the commission. RCW 18.64A.040.

Whether an act falls within the scope of practice of a pharmacy technician is dependent on two criteria: (i) the act is nondiscretionary, and (ii) the act is associated with the practice of pharmacy. The commission determined that administration of medications or devices is a nondiscretionary function and is associated with the practice of pharmacy. RCW 18.64.011(1), (10), and (28).

A pharmacy technician must be under the immediate supervision and control of a pharmacist when performing a nondiscretionary function associated with the practice of pharmacy. RCW 18.64A.030(1). A pharmacy technician may not be supervised by anyone other than a pharmacist licensed by the commission. RCW 18.64.010(3) and RCW 18.64A.030(1). Consequently, a pharmacist must supervise a pharmacy technician when the pharmacy technician is administering medications or devices.

A pharmacy technician may not engage in any nondelegable task associated with the practice of pharmacy. The commission has a number of tasks that a pharmacist shall not delegate to ancillary personnel, including pharmacy technicians. WAC 246-945-320. The administration of medications or devices is not included as a nondelegable task.

Pharmacies may only use pharmacy technicians in a manner that is consistent with an AUP approved by the commission. The commission may approve, reject, or modify a proposed AUP. RCW 18.64A.060. Further, if the commission receives a complaint that pharmacy technicians are being used in a manner that is inconsistent with an approved AUP, the commission may withdraw its approval of the AUP. RCW 18.64A.060.

In May 2024, the commission determined that pharmacy technicians-in-training should be included in this guidance document. The same requirements and restrictions that apply to pharmacy technicians administering medications and devices shall also apply to pharmacy technicians-in-training.

Guidance to Pharmacies Submitting AUPs to Allow Pharmacy Technicians or Pharmacy Technicians-in-Training to Administer Medications or Devices

Pharmacies who would like to use pharmacy technicians or pharmacy technicians-in-training, for delegation by a pharmacist, to administer medications or devices must submit an AUP to the commission for approval. The commission will consider proposed AUPs for approval that meet the following criteria as it applies to pharmacy technicians or pharmacy technicians-in-training who are administering medications:

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1. The pharmacist or pharmacy intern must retain the discretionary function to determine the patient's needs and all clinical assessments, including patient counseling regarding potential risks and side effects. If the pharmacist makes a determination that the pharmacy technician or pharmacy technician-in-training has the appropriate skills and training per WAC 246-945-315, the pharmacy technician or pharmacy technician-in-training can assist in preparation and administration of the medication or device.
2. The pharmacy technician or pharmacy technician-in-training must have completed adequate and appropriate training on what medications and devices they may administer.
3. Training for pharmacy technicians or pharmacy technicians-in-training who will administer drugs and devices must include or address the following:
 - a. Describe proper technique when preparing and administering medications and devices;
 - b. Recognize commonly used medications and devices and their corresponding routes of administration;
 - c. Distinguish proper needle length selection based on medications and patient age and size;
 - d. Identify proper documentation procedures;
 - e. Recall medications storage requirements;
 - f. Describe safety measures to avoid accidental needle stick injuries;
 - g. Recognize appropriate actions to take in emergency situations;
 - h. Demonstrate a successful technique when administering an intramuscular and subcutaneous injections;
 - i. Demonstrate appropriate distraction techniques during medication and device administration;
 - j. Demonstrate the use of universal precautions as they pertain to bloodborne pathogens; and
 - k. Explain the procedures for managing a medication reaction emergency.

As a reminder, pharmacists must ensure that delegation to a pharmacy technician or pharmacy technician-in-training to administer medications or devices pursuant to an approved AUP, is consistent with applicable law e.g. WAC 246-945-315. This includes, among other things, ensuring the delegated function is performed under the pharmacist's immediate supervision (WAC 246-945-001(44)).

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Moreover, if a pharmacist employs technological means to provide immediate supervision to a pharmacy technician or pharmacy technician-in-training who are administering medications or devices, then the technology must be “sufficient to provide the personal assistance, direction and approval required to meet the standard of practice for the delegated tasks” (WAC 246-945-315(1)). This requirement may necessitate a pharmacist concluding, in some situations, that immediate supervision of a pharmacy technician or pharmacy technician-in-training administering medications or devices via technological means is not consistent with the standard of practice for the delegated task.

Conclusion

Pharmacy technicians or pharmacy technicians-in-training may provide administration of medications or devices under the immediate supervision of a pharmacist if the commission has authorized the pharmacy technician or pharmacy technician-in-training to administer medications or devices by approving an AUP. Pharmacies wishing to use pharmacy technicians or pharmacy technicians-in-training to administer medications or devices should submit an AUP that meets the standards identified in this guidance document.

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