

**Pharmacy Quality Assurance Commission
August 14, 2025 - Minutes**

Convene: Hawkins DeFrance, Chair, called the meeting to order August 14, 2025, 9:03 a.m.

Commission Members:

Hawkins DeFrance, Chair
Ann Wolken, Vice Chair
Jerrie Allard
Stephanie Bardin
Patrick Gallaher
Judy Guenther (left at 4:33 p.m.)
William Hayes
Kenneth Kenyon
Matthew Ray
Craig Ritchie

Staff:

Marlee O'Neill, Executive Director
Lindsay Trant-Sinclair, Deputy Director
Si Bui, Inspector Supervisor
Christopher Gerard, AAG
Taifa "Nomi" Peaks
Joshua Munroe
Haleigh Mauldin
Julia Katz
Irina Tiginyanu
Stacey Isaacs
Amy L Robertson

Commission Members Absent:

Uyen Thorstensen
Teri Ferreira
Huey Yu

1. Call to Order, Hawkins DeFrance, Chair

1.1. Meeting Agenda Approval – August 14, 2025

MOTION: William Hayes moved to approve August 14, 2025, business meeting agenda without edits. Jerrie Allard, seconded. Motion carried, 10:0.

1.2. Meeting Minutes Approval – June 26, 2025

MOTION: William Hayes moved to approve June 26, 2025, meeting minutes without edits. Jerrie Allard, seconded. Motion carried, 10:0.

2. Consent Agenda

2.1. Correspondence

2.1.1. National Precursor Log Exchange Monthly Dashboard – June and July

2.2. Ancillary Utilization Plans Approval

- 2.2.1. Genoa Healthcare
- 2.2.2. Guardian Pharmacy
- 2.2.3. Klickitat Valley Health
- 2.2.4. Rosauers
- 2.2.5. Skagit Regional Health – Multiple Locations
- 2.2.6. West Olympia Pharmacy

2.3. Pharmacy Technician Training Program Approval

- 2.3.1. Fred Hutchinson Cancer Center South Lake Union
- 2.3.2. Fiesta Pharmacy

MOTION: Ann Wolken moved to approve the consent agenda except for 2.2.1. Genoa Healthcare; 2.2.2 Guardian Pharmacy, 2.2.3. Klickitat Valley Health; 2.2.4. Rosauers; and 2.3.2 Fiesta Pharmacy. Judy Guenther, seconded. Motion carried, 10:0.

2.4. Regular Agenda Items Pulled from 2.1., 2.2., or 2.3. The commission discussed items removed from the consent agenda and placed them on the regular agenda for separate discussions.

2.2.1. Genoa Healthcare

MOTION: Hawkins DeFrance moved to approve item 2.2.1. Genoa Healthcare, contingent on the licensee adding “hands out refills when specifically requested to do so by a pharmacist and when a pharmacist has determined counseling is not necessary” to number 9 in the technician AUP. Craig Ritchie, seconded. Motion carried, 9:0, with 1 recusal.

2.2.2. Guardian Pharmacy

MOTION: William Hayes moved to approve item 2.2.2. Guardian Pharmacy, contingent upon striking the words “Patients and” from the beginning of the first dot point of number 14 in the assistant AUP. Ken Kenyon, seconded. Motion carried, 10:0.

2.2.3. Klickitat Valley Health

MOTION: Matthew Ray moved to deny item 2.2.3. Klickitat Valley Health and directed staff to work with licensee to ensure the wording for the retail pharmacy AUP, “checks all prescription orders for completeness of information” and “obtains patient information for verification and documentation by the technician, technician in training or pharmacist” is within scope for an assistant. William Hayes, seconded. Motion carried, 10:0.

2.2.4. Rosauers

MOTION: Jerrie Allard moved to deny item 2.2.4. Rosauers and directed staff to work with the licensee to adjust the language in letter F of the assistant AUP to ensure pharmacists are making the determination about whether counseling is necessary for refills. Matthew Ray, seconded. Motion carried, 10:0.

2.3.2. Fiesta Pharmacy

MOTION: William Hayes moved to approve item 2.3.2. Fiesta Pharmacy. Judy Guenther, seconded. Motion carried, 10:0.

3. Rulemaking for Suspicious Orders and Zero Reports

3.1. PUBLIC HEARING

The commission held a public hearing on the rulemaking to propose amending WAC 246-945-585 and 246-945-590 to clarify expectations for wholesalers submitting suspicious orders and zero reports to the commission.

The public rules hearing began at 9:30 a.m. and closed at 9:33 a.m. No written public comments were received during the public comment period. No oral comments were received during the public hearing.

3.2. Approval of Comment Responses and Authorization to File CR-103 (Suspicious Orders and Zero Reports)

There were no written or oral comments received during the public hearing for the commission to respond to.

MOTION: Matthew Ray moved to adopt the draft rule language for WAC 246-945-585 and WAC 246-945-590 without edits and authorized staff to file a CR-103P. Jerrie Allard, seconded. Motion carried, 10:0.

4. Rulemaking for Pharmacy Modifications and Remodels

4.1. PUBLIC HEARING

The commission held a public hearing on the rulemaking to propose amending WAC 246-945-230 to clarify when pharmaceutical firms need to submit a modification or remodel application and what constitutes a modification or remodel.

The public rules hearing began at 10:30 a.m. and closed at 10:39 a.m. No written public comments were received during the public comment period. Three oral comments were received during the public hearing.

4.2. Approval of Comment Responses and Authorization to File CR-103 (Pharmacy Modifications and Remodels)

There were no written comments received during the public comment period and three oral comments were received during the public hearing for the commission to respond to.

MOTION: Ken Kenyon moved to approve the responses to the received comments, adopt the draft rule language for WAC 246-945-230 with minor edits to clarify the commission's intent, authorized staff to file a CR-103P, and authorized staff to rescind G002.1 following the effective date of the rule. Matthew Ray, seconded. Motion carried, 9:0.

5. Presentations

5.1. Department of Labor and Industries Presentation

Bryan Templeton, Employment Standards Program Manager, and Caitlin Gates, Deputy Policy Director, with the Department of Labor and Industries, presented on employment standards.

MOTION: Matthew Ray moved to direct staff to complete additional research into the statutory authority of the commission to regulate workplace conditions as it pertains to patient safety matters. Judy Guenther, seconded. Motion carried, 10:0.

5.2. Training on the Open Public Meetings Act and Robert's Rules of Order

Christopher Gerard, Assistant Attorney General, provided training on the Open Public Meetings Act and Robert's Rules of Order.

5.3. Commission Budget Report

Ashley May presented the commission budget report.

6. Old Business

6.1. Annual Review of Commission Delegation Agreements

Marlee O'Neill reviewed the current delegation agreements. The commission will continue to use the 2024 delegation agreements. Staff will communicate this decision to relevant staff.

6.2. Health Care Entities and Ancillary Personnel

Christopher Gerard, AAG provided an overview of the statutory framework regarding health care entities (HCEs) and ancillary personnel.

Si Bui, Inspector Supervisor, presented the proposed edits to the self-inspection worksheet.

MOTION: Hawkins DeFrance moved to approve the HCE self-inspection worksheet edits, including removing the endorsements checkbox for use of ancillary personnel on Page 2, and adding a footnote to Question 7, “Please note that 10(a) is only applicable to ancillary staff working under an approved AUP of a licensed pharmacy”, and post the revised HCE self-inspection worksheet to the website. Craig Ritchie, seconded. Motion carried, 10:0.

Joshua Munroe presented on changes needed in WAC 246-945-410 to align with the statutory framework that HCEs cannot utilize ancillary personnel.

MOTION: Jerrie Allard moved to authorize staff to file a CR-101 Rules Inquiry package to amend WAC 246-945-410 to align with the commission’s decision that HCEs cannot utilize ancillary personnel. Judy Guenther, seconded. Motion carried, 10:0.

MOTION: Hawkins DeFrance moved to affirm the commission’s position that only pharmacies can apply to the commission to utilize ancillary personnel. Ann Wolken, seconded. Motion carried, 10:0.

7. New Business

7.1. Update Incorporations by Reference

MOTION: Stephanie Bardin moved to authorize staff to file a CR-105, expedited rulemaking, to update the identified incorporations by reference. Matthew Ray, seconded. Motion carried, 10:0.

7.2. Third Party Inspection Program Request for Nonresident Pharmacies: The Accreditation Commission for Health Care

MOTION: Hawkins DeFrance moved staff to continue discussions with The Accreditation Commission for Health Care to finalize details and bring the presentation back to a future business meeting. Craig Ritchie, seconded. Motion carried, 10:0.

8. Strategic Plan

8.1. Implementation Plan Update

Marlee O’Neill updated the commission on the strategic plan implementation.

MOTION: Matthew Rays moved to approve revisions to the implementation plan as presented. Stephanie Bardin, seconded. Motion carried, 10:0.

8.2. Performance Measures from Joint Operating Agreement

Stacey Isaacs presented the progress made related to the performance measures in the Joint Operating Agreement.

8.3. Review Bylaws

Marlee O'Neill reviewed the proposed amendments to the bylaws.

MOTION: William Hayes moved to approve the amendments to the bylaws without edits. Stephanie Bardin, seconded. Motion carried, 10:0.

9. Rules and Legislation Updates

9.1. Rules Petition: Prescription Transfers

MOTION: Ann Wolken moved to deny the petition request and direct staff to inform the petitioner of the denial. Ken Kenyon, seconded. Motion carried, 10:0.

MOTION: Ann Wolken moved to amend the previous motion to direct staff to include the reasoning for the denial to the petitioner that the request is better suited to be completed at a national level and that the commission's rules on timely prescription transfers are sufficient. Ken Kenyon, seconded. Motion carried, 10:0.

9.2. Rules Authorization: Tamper-Resistant Prescription Pads or Paper

MOTION: William Hayes moved to authorize staff to file a CR-101 to consider rulemaking on tamper-resistant prescription pads or paper. Jerrie Allard, seconded. Motion carried, 10:0.

9.3. Rules Workshop: Utilization of Pharmacy Ancillary Personnel

MOTION: Matthew Ray moved to have staff edit the proposed rule language based on the commission's discussion and bring the revised draft to a future business meeting. William Hayes, seconded. Motion carried, 9:0.

9.4. Rules Workshop: Medication Assistance Expansion SHB 1720

MOTION: Hawkins DeFrance moved to approve the draft rule language for WAC 246-945-714 and request staff to file a CR-102 Rules Proposal package for medication assistance expansion. Craig Ritchie, seconded. Motion carried, 9:0.

9.5. Rules Workshop: Disciplinary Action Reporting Time Frames

MOTION: Ken Kenyon moved to approve the rule language draft of WAC 246-945-230 as presented and request staff to file a CR-102 Rules Proposal package for disciplinary action reporting time frames. Jerrie Allard, seconded. Motion carried, 9:0.

10. Open Forum

Two public comments were received.

11. Commission Member Reports

11.1. Open Discussion Related to Items or Issues Relevant to Commission Business/Pharmacy Practice

- Matthew Ray requested clarification on WAC 246-945-330 and WAC 246-945-332.
- William Hayes advised that NABP appointed him to serve on the committee on constitutions and bylaws.

12. Staff Reports

12.1. Executive Director – Marlee O’Neill

- Si and the inspection team are continuing to complete the changes of ownership and closure inspections related to the recent pharmacy closures.
- At the last meeting, the commission raised the question of reappointments and appointing new commissioners for those that are continuing to serve even though their terms are up. The Department of Health has reached out to the governor's office on this topic.
- All the 2026 Business Meetings were to be held at L&I, but the November 2026 Business Meeting had to be moved to ESD 113 due to a scheduling conflict.

12.2. Deputy Director – Lindsay Trant-Sinclair

- There has been a heavy increase in scam calls and emails from people impersonating DOH staff. They can impersonate our phone numbers, names, emails, etc. The best course of action is to hang up and call 360-236-4946. Even if it looks like the call is coming from that number, you should still hang up and dial it.

12.3. Pharmacist Supervisor – Si Bui

- DOH has approved hiring an inspector for Area 5, which covers the downtown area of Seattle.

12.4. Assistant Attorney General – Christopher Gerard

- No updates provided.

13. Summary of Meeting Action Items

- **1.2 Meeting Minutes Approval** – Staff will finalize and post the minutes on the commission’s website.
- **2. Consent Agenda** – Staff will convey the decision to the applicants and the Office of Customer Service.
- **3. Rulemaking for Suspicious Orders and Zero Reports** – Staff will file the CR-103P.
- **4. Rulemaking for Pharmacy Modifications and Remodels** – Staff will file the CR-103P with the clarifying edits discussed with the commission and rescind the guidance document G002.1 once the rule is effective.
- **5.1 Department of Labor and Industries Presentation** – Staff will do research on statutory authority for pharmacy workplace conditions and patient safety matters.
- **6.1 Annual Review of Commission Delegation Agreements** - Staff will continue to use the current delegation agreements as discussed and let all relevant parties know.
- **6.2 Health Care Entities and Ancillary Personnel** – Staff will finalize the HCE self-inspection worksheet with the edits discussed with the commission and staff will file a CR-101 Rules Inquiry package to amend WAC 246-945-410 to align with the commission’s decision that HCEs cannot utilize ancillary personnel.
- **7.1 Update Incorporations by Reference** – Staff will file a CR-105, expedited rulemaking, to update the identified incorporations by reference.
- **7.2 Third Party Inspection Program Request for Nonresident Pharmacies: The Accreditation Commission for Health Care** – Staff will work with the Accreditation Commission for Health Care to flush out their application and bring it back to the commission for review at a future business meeting.
- **8.3 Review Bylaws** – Staff will finalize the bylaws with the revisions approved today and post the bylaws to Box.com.
- **9.1 Rules Petition: Prescription Transfers** – Staff will convey the denial of the petition and send the 60-day response letter to the petitioner.
- **9.2 Rules Authorization: Tamper-Resistant Prescription Pads or Paper** – Staff will file a CR-101 to consider rulemaking on tamper-resistant prescription pads or paper.
- **9.3 Rules Workshop: Utilization of Pharmacy Ancillary Personnel** – Staff will update with the edits discussed today and bring back for review at a future business meeting and send out to stakeholders.
- **9.4 Rules Workshop: Medication Assistance Expansion SHB 1720** - Staff will file a CR-102 Rules Proposal package for medication assistance expansion.
- **9.5 Rules Workshop: Disciplinary Action Reporting Timeframes** – Staff will file a CR-102 Rules Proposal package for disciplinary action reporting time frames.

5:14 p.m. Business Meeting Adjourned