



Pharmacy Quality Assurance Commission GUIDANCE DOCUMENT

Title:	Chart Orders and the Use of Practitioner Authorized Agent Signatures in Long-Term Care Settings	Number:	51
Reference:	RCW 18.64.550, 69.41.055		
Contact:	Steve Saxe, Executive Director		
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Approved:	Chairperson, Pharmacy Quality Assurance Commission		

RCW 69.41.041 allows chart orders to be used for dispensation of prescription legend drugs to a resident of a long-term care facility or hospice program. However, the legislature did not expressly include chart orders for prescription of controlled substances in amendments to chapter 69.50 RCW (Uniform Controlled Substance Act). The Commission concludes that by omitting the use of chart orders and associated standards for prescription of controlled substances from the UCSA, the legislature implied that such use is excluded.

Until rules are developed and adopted, implementing Engrossed Substitute Senate Bill 6203, the Commission issues the following guidance for our licensees:

Use of Chart Orders

The Commission concludes the use of chart orders is limited to residents of long-term care facilities or hospice programs and may **only be used for orders of non-controlled substances.**

Pursuant to RCW 18.64.550 a chart order must contain:

1. The full name of the patient;
2. The date of issuance;
3. The name, strength, and dosage form of the drug prescribed;
4. Directions for use; and
5. An authorized signature. (Either by the prescribing practitioner or their authorized agent.)

RCW 69.41.041 allows for **any** pharmacy to dispense legend drugs for **a resident of a long-term care facility or hospice program** pursuant to a valid prescription or chart order.

A chart order can be communicated electronically or via facsimile, and may be communicated by a practitioner's authorized agent. RCW 69.41.055(2).

Signature Authority of Practitioner's Agents

RCW 18.64.550 and RCW 69.41.055(2) together allow for a practitioner's authorized agent in a long-term care facility or hospice program to sign a chart order for non-controlled substances on behalf of a prescribing physician.

RCW 18.64.550 and RCW 69.41.055(2) together further allow for a practitioner's agent in a long-term care facility or hospice program to electronically sign a chart order on behalf of a prescribing physician and those chart orders are to be considered as electronic communication of prescription information.

Electronic prescribing systems may enable functions pertaining to delegated authority signatures, or authorized agent signatures. This function is limited to the use and transmission of chart orders, and may not be used for regular prescriptions.

Electronic prescribing systems that have already been approved by the Commission do not need to come to the commission for re-approval by turning on this function. They will be reviewed on the review schedule currently in place.

Who can be a practitioner's authorized agent?

RCW 18.64.550(2) allows "a licensed nurse, pharmacist, or physician practicing in a long-term care facility or hospice program" to act as a practitioner's authorized agent.

Is an authorized agent's signature authority limited?

Yes. The authorized agent's signature allowance is limited to the use of chart orders only, and do not apply to prescriptions as defined as "legible prescriptions" in RCW 69.41.010. There are a number of other RCW's that detail what a prescription must contain, however none of those statutes were amended by ESSB 6203 to allow for an authorized agent's signature.

What are the signature requirements for chart orders?

1. For written orders, the order must contain
 - a. the prescribing practitioner's signature, or
 - b. the signature of the practitioner's authorized agent, and include the name of the prescribing practitioner
2. For electronic or digital orders, the order must contain:
 - a. The prescribing practitioner's electronic or digital signature, or
 - b. The electronic or digital signature of the practitioner's authorized agent, including the name of the prescribing practitioner. (i.e. Shawn Carter, RN on behalf of Christopher Wallace, MD)

Can an authorized agent electronically sign and communicate a chart order for legend drugs?

Yes. As stated above an authorized agent may sign a chart order on behalf of a prescribing practitioners. RCW 69.41.055(2), amended the electronic communication of prescription information section of the Legend Drugs Act. It states:

The electronic or digital signature of the prescribing practitioner's agent on behalf of the prescribing practitioner for a resident in a long-term care facility or hospice program, pursuant to a valid order and authorization under RCW 18.64.550, constitutes a valid electronic communication of prescription information. Such an authorized signature and transmission by an agent in a long-term care facility or hospice program does not constitute an intervening person having access to the prescription drug order.

Can an authorized agent sign and communicate a prescription for controlled substances?

An authorized agent CANNOT sign a prescription for a controlled substance.

An authorized agent may communicate the prescription for a Schedule III-V controlled substance to a pharmacy for a resident of a long-term care facility or hospice program. RCW 69.50.308.