



**Department of Health**  
**Pharmacy Quality Assurance Commission**  
**Guidance Document**

<i>Title:</i>	Access to Drugs Stored Outside of the Pharmacy
<i>References:</i>	WAC 246-945-455; RCW 18.130.040
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<i>Approved By:</i>	Tim Lynch, PharmD, MS, FABC, FASHP, Pharmacy Quality Assurance Commission Chair

The Pharmacy Quality Assurance Commission (commission) will begin a review of WAC 246-945-455. Specifically, the requirement in WAC 246-945-455(1)(c) that drugs stored outside the pharmacy can only be accessed by health care professionals licensed under the chapters specified in RCW 18.130.040 acting with their scope and nursing students.

The commission has been informed of potential unintended disruption to the drug supply chain within health care facilities by requiring only licensed health care professionals to access drugs stored outside the pharmacy. Historical practices have permitted unlicensed employees of health care facilities to access certain drug products for supply chain management needs. To avoid continued disruption, the commission is providing this guidance to ensure continuous patient care.

While engaging in this review, the commission will not find licensees deficient or take enforcement action for violations of WAC 246-945-455(1)(c) when unlicensed employees of a health care facility access drugs stored outside the pharmacy if the following conditions are met:

- The unlicensed employee of a health care facility is operating within the scope of their employment;
- The unlicensed employee is only accessing drugs for the purposes of supply chain management within the health care facility;
- The unlicensed employee is only accessing drugs listed in a policy and procedure that is in a readily retrievable form;
- The unlicensed employee cannot access controlled substances under any circumstances or access drug products as part of dispensing a prescription or order; and
- The pharmacy meets all other requirements of WAC 246-945-455 and applicable laws.