

Pharmacy Quality Assurance Commission

Policy Statement

Revised – 10/18/11

<i>Title:</i>	Regulatory Standards Applicable to Remote Dispensing Sites
<i>References:</i>	Substitute Senate Bill 6086, Opioid Use Disorder Medications – Remote Dispensing Sites (chapter 244, Laws of 2020) and WAC 246-945-455, Drugs Stored Outside of the Pharmacy
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<i>Supersedes:</i>	July 1, 2020
<i>Approved By:</i>	Tim Lynch, Pharmacy Quality Assurance Commission

This policy statement clarifies the regulatory standards applicable to remote dispensing sites registered by pharmacies under Opioid Use Disorder Medications – Remote Dispensing Sites, ch. 244, Laws of 2020 (SSB 6086). Specifically, the Pharmacy Quality Assurance Commission (commission) will expect remote dispensing sites to operate in a manner that complies with the requirements of SSB 6086 and WAC 246-945-455 (Drugs stored outside of the pharmacy) except for WAC 246-945-455(1)(e) and WAC 246-945-455(2).

In order to increase access to medications for vulnerable populations with opioid use disorder (OUD), the Legislature passed SSB 6086, which allows pharmacies to extend their pharmacy licenses to include remote dispensing sites. Effective July 1, 2020, pharmacies may register a remote dispensing site with the commission. Once registered, the pharmacy’s license is extended to include the remote dispensing site. SSB 6086 states a remote dispensing site is “where technology is used to dispense medications approved by the United States Food and Drug Administration (FDA) for the treatment of opioid use disorder.”

SSB 6086 requires the commission to adopt rules establishing minimum standards for remote dispensing sites. While the commission engages in rulemaking specific to remote dispensing sites, the commission has determined that:

1. Remote dispensing sites must comply with the minimum requirements in SSB 6086; and
2. Remote dispensing sites fall within, and should comply with, the commission’s rules contained in WAC 246-945-455 (Drug stored outside the pharmacy), except for WAC 246-945-455(1)(e) and WAC 246-945-455(2).

Remote dispensing sites registered by pharmacies under SSB 6086 will not be expected to comply with WAC 246-945-455(1)(e) because SSB 6086 does not require the remote dispensing site to be located within a premises that is otherwise licensed to possess and store drugs. Instead, SSB 6086 explicitly extends the pharmacy license to include drugs stored in registered remote dispensing sites regardless of whether the remote dispensing site is located within a premises that is otherwise licensed to possess and store drugs.

Remote dispensing sites registered by pharmacies under SSB 6086 will not be expected to comply with WAC 246-945-455(2) because this rule addresses regulatory requirements for pharmacies that are storing an emergency kit or supplemental dose kit in a nursing home or hospice program under RCW 18.64.560. Pharmacies who register a remote dispensing site do not fall within the purview of RCW 18.64.560.

This policy statement describes the commission's current approach to the implementation of SSB 6086 by describing the minimum statutory and rule requirements applicable to remote dispensing sites until the commission adopts rules specific to remote dispensing sites.