

Department of Health
Nursing Care Quality Assurance Commission

Advisory Opinion

The Nursing Care Quality Assurance Commission (NCQAC) issues this advisory opinion in accordance with WAC 246-840-800. An advisory opinion adopted by the NCQAC is an official opinion about safe nursing practice. The opinion is not legally binding and does not have the force and effect of a duly promulgated regulation or a declaratory ruling by the NCQAC. Institutional policies may further restrict practice in that facility's setting and/or impose additional requirements to assure patient safety and/or decrease risk.

<i>Title:</i>	Naloxone Prescribing Clarification	<i>Number:</i> NCAO 22.00
<i>References:</i>	RCW 18.79.800 Opioid Prescribing Rules Nursing Scope of Practice Decision Tree RCW 69.41.095(5) Opioid Overdose - Standing Order	
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<i>Effective Date:</i>	July 10, 2020	
<i>Supersedes:</i>	Not Applicable	
<i>Approved By:</i>	Nursing Care Quality Assurance Commission	

Statement:

This Advisory Opinion will serve to clarify the intended meaning of the word “confirm” in Nursing Care Quality Assurance Commission (NCQAC) rule: [WAC 246-840-4980](#). The word “confirm” means the ARNP provides the patient with information regarding a [standing order](#) issued under the prescribing authority of the State Health Officer to allow an eligible person or entity to obtain naloxone at any Washington state pharmacy.

Background:

A request was made by the Advanced Practice Subcommittee for the NCQAC to clarify the phrase “shall confirm or provide a current prescription for naloxone when fifty milligrams MED or above, or when prescribed to a high-risk patient” in WAC [246-840-4980](#). Nurse Practice Act, chapter [18.79](#) RCW, gives full prescribing authority to ARNPs who have undergone proper education and training. Additionally, by law, RCW [69.41.095\(5\)](#), any person at risk of experiencing an opioid-related overdose or any person or entity in a position to assist a person at risk of experiencing an opioid-related overdose in Washington state has access to a naloxone prescription at any pharmacy in this state, by standing order under the prescribing authority of the State Health Officer. The purpose of this standing order is to facilitate wide distribution of the opioid antagonist naloxone so people in Washington can provide assistance to persons experiencing an opioid-related overdose.

Recommendations:

Given that the standing order is statewide, the ARNP with prescriptive authority may “confirm” the prescription of naloxone by informing the patient of their eligibility and of the availability of naloxone by standing order, following the guidelines outlined in the [State Health Officer’s standing order](#). As such, the word “confirm” in [WAC 246-840-4980](#) means that the ARNP is providing the patient with information regarding the [standing order](#) for naloxone issued by the State Health Officer that provides that naloxone shall be dispensed by any Washington state pharmacy to persons at risk of experiencing an opioid overdose or to persons or entities in a position to assist a person at risk of experiencing an opioid-related overdose.

Conclusion:

In conclusion, the NCQAC determines that the word “confirm” in [WAC 246-840-4980](#) includes the ARNP providing education regarding access to naloxone available to all eligible persons or entities in Washington state or providing a current prescription to a patient or eligible person or entity.