The Department of Health (department) recognizes the American Red Cross as a nationally recognized organization experienced in anaphylaxis and autoinjector training for the purposes of RCW 70.54.440. Other training providers will be evaluated once standards have been adopted in rule.

Background and Analysis

Background

The 2016 legislature passed Substitute Senate Bill (SSB) 6421 (Chapter 10, Laws of 2016), codified as RCW 70.54.440 Epinephrine autoinjectors—Prescribing to certain entities—Training—Liability—Incident reporting.

The statute applies to authorized entities that choose to obtain epinephrine autoinjectors. An authorized entity is defined as “any entity or organization at or in connection with which allergens capable of causing anaphylaxis may be present, including, but not limited to, restaurants, recreation camps, youth sports leagues, amusement parks, colleges, universities, and sports arenas” (RCW 70.54.440(7) (b)). Before an employee or representative of an authorized entity may obtain or use epinephrine autoinjectors, he or she must complete an anaphylaxis and epinephrine autoinjector training.

---

1 An epinephrine autoinjector is a medical device used to deliver a single dose of epinephrine or adrenaline for the emergency treatment of anaphylaxis. Anaphylactic shock is a serious allergic reaction with rapid onset and may cause death. Common causes include insect bites or stings, foods, plants, chemicals or medications.
RCW 70.54.440 states that anaphylaxis training “must be conducted by a nationally recognized organization experienced in training laypersons in emergency health treatment or an entity or individual approved by the department of health.” The training may be conducted online or in-person, and must teach the following content:

- techniques on how to recognize symptoms of severe allergic reactions, including anaphylaxis;
- standards and procedures for the storage and administration of an epinephrine autoinjector; and
- emergency follow-up procedures.

Analysis

Implementation of RCW 70.54.440 will require rulemaking. Rules will provide guidance for authorized entities and training programs. Specifically, the rules will establish parameters for trainings to be approved by the department and the process for reporting and collecting incidents of epinephrine autoinjector use.

Since the statute went into effect in June 2016, stakeholder feedback to the department has indicated a demand for anaphylaxis training by authorized entities and individuals wishing to use epinephrine autoinjectors under this law. The department is developing rules to set the standards to approve anaphylaxis trainings, so that training participants do not receive inaccurate information about anaphylaxis which could cause incorrect administration of epinephrine. In order to meet the public’s demand and support public safety, the need is clear for a readily available, approved anaphylaxis training under RCW 70.54.440 until rulemaking is completed.

The department has completed a review of currently available trainings that meet the training requirements of the statute. The department has determined that the American Red Cross Anaphylaxis and Epinephrine Auto-Injector training includes these elements required in the law:

- Techniques on how to recognize symptoms of severe allergic reactions, including anaphylaxis;
- Standards and procedures for the storage and administration of an epinephrine autoinjector;
- Emergency follow-up procedures; and
- Providing a certificate to individuals who complete training

American Red Cross anaphylaxis and epinephrine autoinjector courses are available in classroom or online formats. Classroom courses are up to one hour long. The online format is about 30 minutes, and includes a 10-question learning assessment to complete the course. Both provide the trainee with a 2-year certification (although RCW 70.54.440 does not require individuals to renew their certification).

Washington’s epinephrine autoinjector law is similar to laws in five other states: Colorado, Michigan, Minnesota, Idaho, and Rhode Island. These states require the same training content as specified in RCW 70.54.440. Epinephrine laws in these other states also require that training be provided by a nationally recognized organization experienced in training laypersons in emergency health treatment. All five of the states have identified the American Red Cross as meeting the requirements to provide anaphylaxis and epinephrine autoinjector training.

Conclusion

The department acknowledges the need for authorized entities to obtain epinephrine autoinjectors, and for individuals to complete training in administration of epinephrine autoinjectors for a person experiencing anaphylaxis. The implementation of RCW 70.54.440 requires participating authorized entities interested in obtaining epinephrine autoinjectors for use by their employees or representatives to complete approved anaphylaxis and epinephrine autoinjector training. The department plans to adopt rules setting criteria for approving anaphylaxis training providers for the purpose of this law.

While the rulemaking process is underway, the department recognizes the American Red Cross as a nationally recognized organization experienced in training laypersons in emergency health treatment that can be used by employees or representatives of authorized entities that choose to store and use epinephrine autoinjectors under RCW 70.54.440. Other anaphylaxis and epinephrine autoinjector training providers will be evaluated by the department once rulemaking on anaphylaxis training standards has been completed.