Report to the Legislature

EPINEPHRINE AUTOINJECTOR INCIDENT REPORTING

September 2019
RCW 70.54.440

Prepared by
Health Systems Quality Assurance
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Secretary of Health
Executive Summary

In 2016, the Washington State Legislature enacted Substitute Senate Bill (SSB) 6421 (Chapter 10, Laws of 2016), codified as RCW 70.54.440, regarding epinephrine autoinjectors. The law allows health care providers with prescriptive authority to prescribe epinephrine autoinjectors to authorized organizations. Those authorized organizations could include, but are not limited to, restaurants, amusement parks, colleges, and camps.

RCW 70.54.440 requires authorized organizations to report to the Washington State Department of Health (department) when an incident has occurred that required the use of the epinephrine autoinjector. The department maintains a webpage to educate the public, and authorized organizations, on the use and reporting requirements for these devices. RCW 70.54.440 also requires the department to issue an annual report summarizing incidents of the use of epinephrine autoinjectors by authorized organizations. Since this law went into effect June 9, 2016, the department has not received any incident reports.

The Department of Health maintains a registry of entities approved to provide training to authorized organizations on how to identify anaphylaxis, and how to administer epinephrine using an autoinjector.

Background

RCW 70.54.440 allows non-health care or non-school personnel to possess epinephrine autoinjectors in environments where a person could experience anaphylaxis. Personnel must first receive training on how to identify anaphylaxis and administer epinephrine using the autoinjector device. This will help to keep people safe before an ambulance can arrive, which can take 20 minutes or more. Specifically, the law addresses:

- Access to epinephrine autoinjectors;
- Storage and maintenance of epinephrine autoinjectors;
- Training standards on recognizing anaphylaxis, storing and administering a device, and emergency follow-up procedures;
- Training verification; and
- Incident reporting of epinephrine autoinjector use by authorized organizations.

Implementation of the Law

The department reached out to a diverse set of stakeholders during the implementation of RCW 70.54.440. Because the law may affect all Washingtonians, the department sought out comments from stakeholders for more than a year, from September 27, 2016, to October 10, 2017, in order to incorporate robust feedback into creating and adopting rules. The department
notified stakeholders, including universities, outdoor recreation organizations, and training providers, via email about the law.

Rules were adopted in February 2018 under Chapter 246-570 WAC to guide the implementation of the law. The rules outline specific requirements for training providers, training content, certificates of completion, the training approval process, and incident reporting of use of epinephrine autoinjectors.

**Stakeholder Communication**

The department has published a webpage with information to assist the public, authorized organizations, prescribers, dispensers, and training providers with meeting the law’s requirements. The information is presented in a “frequently asked questions” format. The department will continue to refine communication based on questions it receives from the public.

**Incident Reporting**

Since October 2017, the department has provided a web reporting tool for authorized organizations to report incidents of epinephrine autoinjector use. No incidents were reported.

**Training Opportunities**

The department has approved epinephrine autoinjector and anaphylaxis training for 10 entities since 2018. The department will continue to process training provider applications to increase the opportunities for authorized organizations to acquire appropriate training. The list of entities providing this training for authorized organizations are included in Appendix A.

**Update for 2018 Priorities**

The department set two goals in the previous report:

- The first goal was to identify people or organizations that had received training. As a follow up to the ongoing work highlighted in the 2018 report, the department surveyed all licensed entities in Washington that provide training for anaphylaxis identification and administering epinephrine through autoinjectors. The department reached out to each training entity and determined that 27 organizations were trained and 1,487 people received training.

- The second goal was to increase likelihood of reporting by these people or organizations. The department revised the website for epinephrine autoinjectors to make information more accessible and easy to use. The department also sent a letter to all registered entities that provide training to remind them of the provisions of Substitute Senate Bill (SSB) 6421. This communication is attached as Appendix B.
Next Steps

The department will continue to evaluate communications with entities and the general public to improve reporting of the use of epinephrine autoinjectors, as intended by SSB 6421.
## Appendix A: Washington training entities for authorized organizations

<table>
<thead>
<tr>
<th>Training Entity</th>
<th>Training Locations in Washington</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Red Cross</td>
<td>Joint Base Lewis-McChord Chehalis, Tacoma, Bremerton, Seattle, Everett, Sequim, Port Hadlock, Wenatchee, Oak Harbor, Ellensburg, Yakima, Spokane, Richland, Kennewick, Republic</td>
<td><a href="http://www.redcross.org">www.redcross.org</a></td>
</tr>
<tr>
<td>Allertrain</td>
<td>Entity is based in Fort Collins, Colo. The entity travels to worksites in Washington to facilitate training.</td>
<td><a href="http://www.allertrain.com">www.allertrain.com</a></td>
</tr>
<tr>
<td>Columbia Safety Training Center</td>
<td>Kennewick</td>
<td><a href="http://www.columbiasafety.net">www.columbiasafety.net</a></td>
</tr>
<tr>
<td>Longleaf Wilderness Medicine</td>
<td>Entity is based in Sandpoint, Idaho. The entity reserves locations throughout Washington to facilitate training (YMCA, community centers, worksites, etc.)</td>
<td><a href="http://www.longleafmedical.com">www.longleafmedical.com</a></td>
</tr>
<tr>
<td>Wilderness Medicine Training Center</td>
<td>Entity is based in Winthrop, Wash., but does not have a training facility at that location. The entity reserves locations throughout Washington to facilitate trainings.</td>
<td><a href="http://www.wildmedcenter.com">www.wildmedcenter.com</a></td>
</tr>
<tr>
<td>Wilderness Medical Associates</td>
<td>Entity is based in Portland, Maine. The entity reserves locations throughout</td>
<td><a href="http://www.wildmed.com">www.wildmed.com</a></td>
</tr>
<tr>
<td>Ambercross</td>
<td>This entity is affiliated with the National Safety Council, and is contracted by businesses to provide jobsite training for staff.</td>
<td><a href="http://www.ambercross.org">www.ambercross.org</a></td>
</tr>
</tbody>
</table>
Appendix B: Message to training entities:

STATE OF WASHINGTON

DEPARTMENT OF HEALTH

April 29, 2019

Organization Address

Address

Address

RE: Notification of epinephrine autoinjector trainees regarding incident reporting requirements

Dear Epinephrine Autoinjector and Anaphylaxis Training Program,

Your organization is recognized by the Washington State Department of Health (department) as an authorized Epinephrine Autoinjector and Anaphylaxis Training Provider.

In 2016, the Washington State Legislature enacted Substitute Senate Bill (SSB) 6421 (Chapter 10, Laws of 2016), codified as RCW 70.54.440, regarding epinephrine autoinjectors. The law allows health care providers with prescriptive authority to prescribe epinephrine autoinjectors to authorized entities who have received training in the administration of epinephrine autoinjectors and anaphylaxis by an approved training provider. The law also requires those authorized entities to report to the department when an incident has occurred that required the use of the epinephrine autoinjector. The incident must be reported within five days of the occurrence. The incident must be reported to the department via the Epinephrine Autoinjector Incident Reporting Survey located on the department’s website, www.doh.wa.gov.

The department is requesting your assistance in notifying your Washington State based trainees of this requirement as part of your training curriculum.
If you have any questions about the reporting content or other questions related to RCW 70.54.440, please contact Nathan Markiewicz, program manager for the Epinephrine Autoinjector Program at 360-236-4887 or Nathan.markiewicz@doh.wa.gov.

Sincerely,

Martin Pittioni  
Director, Office of Health Professions  
Division of Health Systems Quality Assurance  
Washington State Department of Health