May 29, 2020

Dear commission members, members of the public, and stakeholders,

More than three years ago, the Pharmacy Commission embarked upon a bold strategy to rewrite the rules governing the practice of pharmacy in Washington state.

We began this monumental task to fully support our mission to promote public health, safety, and welfare by establishing the highest quality standards of practice. We also aimed to advocate for patient safety through effective communication with the public, the profession, Department of Health, governor, and the legislature.

The majority of our rules have not been updated or adapted since the early 1990s to fit our new practice settings or the evolution of how patient care is delivered. While well-intended, when the rules were originally written they reflected practice settings that in some cases dated to 40 years earlier. Applying these standards became in some situations a barrier to providing safe, high-quality care in a changing health care environment.

While we worked to update each rule, it became clear that a one-off approach would not be sufficient to address the backlog of rules because of a rules moratorium that prevented rule updates.

In approaching our work to rewrite the pharmacy rules, we convened a group of stakeholders, members of the profession, members of the public, commission members, and DOH staff.

The purpose was to create the framework upon which we would craft new rules. One foundational element of this work was to try to anticipate what health care would look like in the next 20 years, with the goal that our rules would remain contemporary over that time. We focused on moving away from prescriptive rules that spelled out in detail how each action should be taken to professional practice standards or standards of care model, where there would be reliance on licensees to work within their scope of practice, and to adhere to best practices to perform activities.
However, where prescriptive standards were needed, we included them to ensure the proper guardrails were in place.

We are now nearing the end of our journey, and have successfully updated and modernized our rules.

After numerous stakeholder meetings, we have held true to our vision and have crafted rules that will fulfill our mission and allow for pharmacy to be on the forefront of providing safe, high-quality care for generations to come. We hope to continue to work with the public throughout this transition process to the new rules.

I am thankful for the engagement of our licensees and stakeholders in this process, and for the excellent support our staff have provided the commission over the last few years.

Through your support, we have succeeded in this bold journey.

Sincerely,

Tim Lynch, PharmD, MS, FABC, FASHP
Chair, Washington State Pharmacy Quality Assurance Commission