

WHEREAS, all health departments in the State of Washington, including the Mason County Health Department, operate clinical services for the control and treatment of sexually transmitted diseases and tuberculosis, in conformance with WAC 248-99-030 to 040 and WAC 248-100-230, respectively; and

WHEREAS, clients served by these and other clinical services provided by health departments are, for the most part, low-income and disenfranchised individuals who have difficulty in accessing mainstream health care services; and

WHEREAS, the aforementioned clinical services include, as a necessary component, drug therapies provided for by a small number of drug entities; and

WHEREAS, both access to the drugs required for treatment of tuberculosis, sexually transmitted diseases and other communicable diseases, and compliance with the associated drug therapy requirements, is of central importance to the cure, mitigation and control of the communicable disease and to prevention of future communicability; and

WHEREAS, it has been demonstrated that the traditional drug delivery system is unable to meet the specific needs of the majority of individuals served by public health clinical programs because of the specific characteristics of the population (low-income, limited mobility, etc.) and those of the provider system (need for reimbursement, lack of physical continuity with clinical programs); and

WHEREAS, most if not all health departments use clinic nursing staff to dispense drugs in response to a specific physician order or protocol, to clients of the clinical programs, using a formulary of a few basic drugs to support that function; and

WHEREAS, use of registered nurses to deliver drugs to clients of clinical programs does not constitute an undue risk to those clients, owing to the high level of training, experience and specialization of the nursing staff, together with the professional prepackaging by registered pharmacists of the drugs to be used; and

WHEREAS, state statutes and regulations provide neither a clear prohibition nor a clear authorization for nurses to deliver medications under the circumstances described above; and

WHEREAS, the Washington State Board of Pharmacy is considering draft regulations in an attempt to clarify the nurses' role in the delivery of drugs; and

WHEREAS, regulations which would provide for a pharmacist-controlled system are unnecessary and would present unacceptable economic hardships and programmatic problems to health departments; and

WHEREAS, the Board of Health has seen no evidence that the long standing use of registered nurses by the Mason County Health Department in the drug delivery process has resulted in problems which could have been avoided through use of the traditional pharmacy system; and

WHEREAS, the Board of Health recognizes the potential assistance that local pharmacists can provide in a collaborative, supportive, multiprofessional teamwork approach;

NOW, THEREFORE, BE IT RESOLVED that the Board of Health urges the Washington State Board of Pharmacy to avoid using a regulatory approach which incorporates Board of Pharmacy/Pharmacist approval of and control over the delivery of drugs by nurses to clients of public health clinical programs, but rather incorporates the following:

1. Involvement of a local pharmacist in a consultative mode as a member of a health department committee, to assist in the development of policies, procedures and appropriate manuals and materials associated with the drug delivery process;
2. Requirement that drugs to be delivered by registered nurses be prepackaged in suitable form and format by registered pharmacists; and
3. Maintenance and retention of appropriate records to document the delivery of drugs to clients of the public health department programs.

Rebecca S. Jacobe  
Clerk of the Board

May 20, 1985  
Date

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