



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Olympia, Washington 98504

NOTICE OF ADOPTION OF AN INTERPRETIVE STATEMENT

Title of Interpretive Statement: Reconstitution of Medications by Medical Assistant-Certified and Medical Assistant-Registered. Interpretive Statement Number: IS20-01

Issuing Entity: Department of Health

Subject Matter: Medical assistants reconstituting medications as part of medication administration

Effective Date: August 26, 2020

Contact Person: Tracie Drake; 360-236-4766

OFFICE OF THE CODE REVISER
STATE OF WASHINGTON
FILED

DATE: September 10, 2020

TIME: 11:16 AM

WSR 20-19-043

*Department of Health
Health Systems Quality Assurance
Office of Health Professions*

Interpretive Statement

Revised – 10/18/11

<i>Title:</i>	Reconstitution of Medications by Medical Assistant-Certified and Medical Assistant Registered	<i>Number:</i> IS20-01
<i>References:</i>	RCW 18.360.050 RCW 18.360.010 RCW 18.360.060 WAC 246-827-0240	
<i>Contact:</i>	Tracie Drake, Program Manager	
<i>Phone:</i>	360-236-4766	
<i>Email:</i>	Tracie.Drake@doh.wa.gov	
<i>Effective Date:</i>	August 26, 2020	
<i>Supersedes:</i>	Not applicable	
<i>Approved By:</i>	Kristin Peterson, HSQA Assistant Secretary	

A medical assistant-certified (MA-C) and a medical assistant-registered (MA-R) may administer certain medications as provided in their scope of practice under [RCW 18.360.050](#) when appropriately delegated and supervised by a health care practitioner. The Department of Health (department) interprets the definition of “administer” in [RCW 18.360.010](#) to include the reconstitution of medication, including vaccines, according to the manufacturer’s directions, prior to its application to the patient. Any reconstitution of medications must be for a specific patient and must meet the delegation requirements provided in [RCW 18.360.060](#) and supervision requirements in [RCW 18.360.010\(11\)](#).

The department recognizes that MA-Cs and MA-Rs across the state are currently reconstituting medications as a part of medication administration. The most common use of reconstitution is for vaccine administration.

The scope of practice of an MA-C and an MA-R includes the administration of medications under the supervision of a licensed physician, osteopathic physician and surgeon, podiatric physician and surgeon, registered nurse or advanced registered nurse practitioner, naturopathic physician, physician assistant, or an optometrist, acting within the scope of his or her license. See RCW 18.360.050(1); RCW 18.360.050(4). [RCW 18.360.010](#) defines administer as:

(1) "Administer" means the retrieval of medication, and its application to a patient, as authorized in RCW [18.360.050](#).

Any medication administration must meet the delegation requirements of [RCW 18.360.060](#), which requires the following determinations for delegation:

- (1) Prior to delegation of any of the functions in RCW [18.360.050](#), a health care practitioner shall determine to the best of his or her ability each of the following:
 - (a) That the task is within that health care practitioner's scope of licensure or authority;
 - (b) That the task is indicated for the patient;
 - (c) The appropriate level of supervision;
 - (d) That no law prohibits the delegation;
 - (e) That the person to whom the task will be delegated is competent to perform that task; and
 - (f) That the task itself is one that should be appropriately delegated when considering the following factors:
 - (i) That the task can be performed without requiring the exercise of judgment based on clinical knowledge;
 - (ii) That results of the task are reasonably predictable;
 - (iii) That the task can be performed without a need for complex observations or critical decisions;
 - (iv) That the task can be performed without repeated clinical assessments; and
 - (v)(A) For a medical assistant other than a medical assistant-hemodialysis technician, that the task, if performed improperly, would not present life-threatening consequences or the danger of immediate and serious harm to the patient; and
- ...
- (2) Nothing in this section prohibits the use of protocols that do not involve clinical judgment and do not involve the administration of medications, other than vaccines.

[WAC 246-827-0240](#) further provides direction for delegation of administration of medications by an MA-C.

The department takes the position that "retrieval" and "application," as used in the definition of "administer" in [RCW 18.360.010\(1\)](#), encompasses the predicate step of reconstituting the medication being applied. This reconstitution must be in accordance with manufacturer directions and in a manner that meets the requirements of [RCW 18.360.060](#) and [WAC 246-827-0240](#).

The task of medication administration under the scope of practice of an MA-C or an MA-R should include the reconstitution of that medication, as long as the reconstitution meets the requirements of [RCW 18.360.060](#). The delegating health care practitioner must ensure that the MA-C or MA-R is reconstituting the medications according to the manufacturer's directions. The MA-C or MA-R must have the training, knowledge, skills, and abilities (competency) to

safely reconstitute and administer the medication in accordance with state and federal laws, regulations, guidelines, and other standards of care.

An MA-C and an MA-R may administer certain medications as provided in their scope of practice under [RCW 18.360.050](#). The Department of Health (department) interprets the definition of “administer” in [RCW 18.360.010](#) to include the reconstitution of medication according to the manufacturer’s directions, prior to its application to the patient. Any reconstitution of medications must be for a specific patient and must meet the delegation requirements provided in [RCW 18.360.060 as well as any other applicable law](#).