



# Oregon Naloxone Laws & Rules FAQs



**Purpose:** To provide pharmacists with a concise overview of key Oregon state and federal laws and rules for prescribing and dispensing short-acting opioid antagonists (e.g., naloxone, nalmefene), also known as opioid overdose reversal medications (OORM).

## Document Overview

- ✓ Pharmacists can prescribe, dispense, distribute, and administer naloxone
- ✓ Pharmacists are legally protected when they administer naloxone
- ✓ **HB 3440 (2017):** There is no training requirement for pharmacists to prescribe naloxone
- ✓ **HB 4143 (2018):** Pharmacists can dispense naloxone without a direct prescription

## Laws & Rules

**ORS 689.800:** Opioid overdose; treatment; administration of short-acting opioid antagonist; liability; rules

**ORS 689.802:** Prescription of short-acting opioid antagonist

**ORS 689.806:** Notice of Availability

**ORS 689.808:** Standing Order

**OAR 855-041-1035:** Minimum Equipment Requirements

**OAR 855-115-0350:** Prescribing Practices

## Key Points

- Pharmacists can administer naloxone in cases of suspected opioid overdose.
- Pharmacists are legally protected when they administer naloxone.
- Adhere to [state rules](#) and [protocols](#) for administering naloxone.
- **Pharmacists are authorized to prescribe naloxone.**
- Ensure proper documentation and patient education when prescribing.
- **HB 4002:** Pharmacists must provide written notice that naloxone prescribing services are available if minimum equipment standards are met and they are 1) prescribing naloxone and 2) have naloxone prescription available.
- Use clear signage and communication to let patients know how to access naloxone.
- **HB: 4002:** Pharmacists can dispense naloxone under a standing order from a non-pharmacist health care provider **without a direct prescription.**
- Pharmacists must comply with rules regarding standing orders and liability protections.
- Pharmacies must meet certain equipment standards to dispense naloxone.
- Follow the [guidelines](#) for prescribing naloxone safely.
- This includes proper patient assessment and education.



# OTC Naloxone Guidance for Pharmacists



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## What changed?

Previously, naloxone, an opioid overdose reversal medications (OORM), was only available through a prescription from a qualified healthcare provider, including from pharmacists in Oregon. In 2023, the U.S. Food and Drug Administration (FDA) **approved the first over the counter (OTC) naloxone** products.

## What are Opioid Overdose Reversal Medications?

OORMs are lifesaving short-acting opioid overdose reversal medications approved by the FDA to reverse an opioid overdose. The two FDA-approved OORMs are naloxone and nalmefene. Naloxone, or brand name Narcan, is the most common. The FDA's approval of OTC naloxone nasal spray now **allows individuals to access this medication without a prescription.**

### Regulatory Changes

- Naloxone sold OTC must have FDA-approved labeling that includes clear instructions on use, storage, and safety information.
- Pharmacists are no longer required to document the sale of OTC naloxone as a prescription medication unless the OTC form is dispensed under the [protocol](#).

### OTC Forms Available:

- [Narcan® naloxone nasal spray, 4mg](#)
- [Padagis® naloxone nasal Spray, 4mg \(generic\)](#)
- [RiVive™ naloxone nasal spray, 3mg](#)



### Common barriers



### Pharmacy Solutions

**X Pharmacy only has Rx naloxone**

**✓ Stock OTC naloxone:** Ensure your pharmacy has an adequate supply of both prescription and OTC naloxone.

**X OTC naloxone is placed behind the counter**

**✓ Ensure easy access to naloxone:** Pharmacies should have ways that patients can access naloxone easily and anonymously.

**X OTC naloxone can be costly (up to \$50)**

**✓ Reduce cost burdens for patients:** Pharmacy staff should inform patients that some insurances or health savings accounts may cover the full cost. Consider still prescribing naloxone, when covered by insurance or providing [community-based resources](#) to obtain free naloxone.

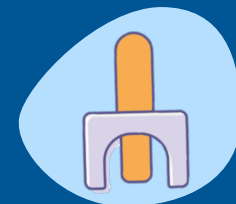
**X Lack of patient education**

**✓ Offer patient counseling:** While counseling is not required for OTC naloxone, unless the OTC form is dispensed under the protocol, pharmacists should continue to offer patients education on overdose response, proper administration, and the importance of calling 911.



**TAKE-AWAY: OTC naloxone increases access for Oregonians and can help save lives.**

# Pharmacist Prescribing of Naloxone



**Purpose:** This document guides pharmacists on prescribing opioid overdose reversal medications (OORM), like naloxone, under Oregon's statewide protocol or standing order pathways. Information provided includes access improvements, patient identification, billing, and education to enhance overdose prevention and harm reduction.



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## What are Opioid Overdose Reversal Medications?

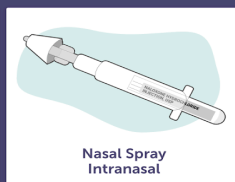
OORMs are lifesaving short-acting opioid overdose reversal medications. Naloxone, or brand name Narcan, is the most common.

Naloxone nasal sprays (e.g., Narcan, Padagis, and ReVive) are now available as over-the-counter medications. Naloxone, in other formulations (e.g., intramuscular, auto-injector), and nalmefene can also be prescribed by pharmacists and are partially or fully covered through insurance.

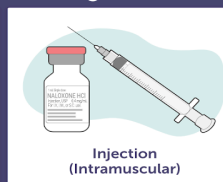
Types of Naloxone



Narcan® Nasal Spray



Nasal Spray Intranasal



Injection (Intramuscular)



Auto-Injector (EVZIO®)

Image from Connect without Stigma

## Are pharmacists allowed to prescribe naloxone?

Pharmacists in Oregon can prescribe naloxone under a [standing order](#) authorized by the Oregon Health Authority (OHA), or [statewide protocol](#) authorized by the Oregon Board of Pharmacy (OBOP). **This allows patients to access naloxone directly from the pharmacy.**

## How do pharmacists improve access?

- ✓ Make offering naloxone a habit. **Normalize it to reduce stigma.**
- ✓ Place naloxone kits in your line of sight as a visual reminder. Place a kit on display for patients to see.
- ✓ Train pharmacy staff how to offer naloxone, ensuring the entire team contributes to expanding patient access.

## Insights from a Pharmacist:

**Adriane Irwin MS, PharmD, BCACP, CDCES** | Chair of the Department of Pharmacy Practice | Oregon State University



Providing naloxone is an easy way to increase patient safety and reduce opioid-related deaths in our communities. Prescribing takes just a few minutes, and now with OTC options, it is even easier to connect patients with this lifesaving medication.



## How to identify patients who may benefit from a naloxone prescription

- Acute opioid prescription  $\geq 50$  MED/day
- Chronic opioid prescription  $\geq 90$  MED/day
- Taking opioids with multiple sedating medications (e.g. benzodiazepines, sleep aids) or using alcohol
- Restarting an opioid or rotating opioids
- Opioid use with a renal, hepatic, respiratory or heart condition
- Receiving opioids from multiple prescribers
- Taking medications for opioid use disorder (e.g., methadone, buprenorphine)
- History of opioid overdose or intoxication
- Limited social support
- Patients purchasing syringes
- Recent abstinence (e.g., detoxification stabilization program, prison)

# Pharmacist Prescribing of Naloxone

## Why should I recommend/prescribe naloxone?

- Naloxone is safe and saves lives.
- Increasing access to naloxone is a proven harm reduction strategy.
- All people who take opioids are at risk for a breathing emergency.
- Pharmacists are trusted and accessible.
- It is an opportunity to provide education and increase opioid safety.

## What do I have to do to prescribe naloxone?

- **There is no specific training required.**
- Review the [Board of Pharmacy rules and regulations](#).
- Review and be familiar with the [OHA-approved naloxone training documents](#).
- Review information on naloxone, including how to identify opioid overdose and administration.
- Consider taking one of the many online continuing education (CE) trainings.

## How do I bill?

- Pharmacists must have a National Provider Identifier (NPI) number like that needed to bill for vaccinations.
- Health plans often cover naloxone, particularly if patients are on chronic opioid therapy and have a history of opioid use disorder.
- A prescription for a friend or family member may not be covered by any health plan.

## What do I include in patient counseling?

1. **Overdose Recognition:** Educate patients on the signs of an opioid overdose, including unresponsiveness, small pupils, slow or shallow breathing, and blue or grey lips or fingernails.
2. **Administration Training:** Provide clear instructions on how to administer naloxone, whether it's the nasal spray or injectable form. Demonstrate if necessary.
3. **Follow-Up Care:** Stress the importance of calling emergency services after administering naloxone, as it may not fully reverse the overdose, and additional doses may be needed.
4. **Tell Others:** Remind them to tell others around them that they have naloxone and where to find it because naloxone cannot be self-administered.

## Importance of counseling

It is important for pharmacists to consult with patients about naloxone because:

- Patients may be unaware of their risk
- Patients may not understand purpose of naloxone, when to use it, how to administer a dose, or follow-up procedures

## Tips for Navigating Conversations



1

### Start the conversation

#### Be direct, concise, and anonymous

- ✓ You are a role model for your patients and coworkers.
- ✓ Think of naloxone as part of the counselling for every opioid prescription.

#### Use a regular and routine conversation starter

**Pharmacist:** "Have you heard about naloxone? I offer it to every patient I have with an opioid prescription."

**Pharmacy technician:** "The pharmacist recommends that everyone picking up opioids also get naloxone, in case of a breathing emergency. Is that something you would like to talk to the pharmacist about today?"

2

### Language Matters

#### Words can be stigmatizing and can stop individuals who are at risk from asking for help.

- ✓ Use language that reduces stigma to allow for more positive and open conversations between you and your patients.



Less Stigmatizing



More Stigmatizing

"Person who uses drugs"

"Addict", "Junkie"

"Slow breathing or breathing emergency"

"Overdose"

"Patient"

"Substance or drug abuser"

- ✓ Ask patients if they would like to know about actions they can take to be safe.
  - Take prescription opioids only as directed even when they have more pain.
  - Avoiding other sedating medications and alcohol when using opioids.
  - Educate patients on the importance of storing their medications safely and securely.
  - Offer naloxone to have on hand if they or someone else shows signs of a breathing emergency.

3

### If a patients decline naloxone

#### Be respectful. Not everyone feels like they're in a position to need naloxone. If a patient declines:

- ✓ Focus the discussion on how to safely use opioids. Let them know that if they change their mind, naloxone is always available at the pharmacy.

# Naloxone Training and Resources for Pharmacists

## Background

As of October 6, 2017, naloxone training is not required, although it is recommended that a healthcare professional or pharmacist have basic education on naloxone and overdose. As required [per rule](#), a pharmacist must offer to provide patient counseling prior to dispensing naloxone.



## General Resources

- [Pharmacist's Role in Dispensing Naloxone](#) - This CDC factsheet provides details on the importance of the Pharmacist's role in naloxone dispensing.
- [Prescribe to Prevent](#) - Here you will find information you need to start prescribing and dispensing naloxone (Narcan) rescue kits, including some useful resources containing further information about this life-saving medicine.
- [Respond to Prevent](#) - The RESPOND TO PREVENT program provides training, resources, and tools to improve the quality and success rate of naloxone offers by community pharmacies.
- [Save Lives Oregon](#) - Save Lives Oregon is a movement for organizations on the front lines of harm reduction in Oregon and Tribal communities.
- [Advisory on Naloxone](#) - Advisory from the U.S. Surgeon General, Jerome Adams, emphasizing importance of the overdose reversal drug, naloxone.
- [Harm Reduction Clearinghouse](#) - The Harm Reduction Clearinghouse provides no-cost supplies such as life-saving naloxone, infection prevention and wound care kits to agencies that directly distribute them to people at risk of overdose and infections related to substance use.

## Continuing Professional Education (CPE)

**\*Although certification is not required for Oregon pharmacists to prescribe naloxone, the following resources are available for those seeking continuing pharmacy education (CPE):**

- [Pharmacy Learning Assistance Network \(ACPE\)](#) - Utilize this nationwide database to locate ACPE approved CPE on a specific topic (e.g., opioids, substance use disorder).
- [Naloxone Rescue: The Pharmacist's Role](#) - (Cost \$25, 1 Credit) - To provide pharmacists with the knowledge and skills to identify risk factors for drug abuse and overdose and incorporate naloxone rescue kits into community pharmacy practice.
- [R.E.S.P.O.N.D. Toolkit](#) - (Cost \$30, 2 credits) Resources Encouraging Safe Prescription Opioid and Naloxone Dispensing (RESPOND) is intended to help community pharmacists identify patients for whom an opioid prescription may present a safety risk, communicate more effectively with patients at the point of care, and coordinate with prescribers to maximize patient safety in the use of prescription opioid pain relievers.
- [Naloxone for Opioid Overdoses: A Life-Saving Intervention](#) - (Cost \$4.95) This activity is for pharmacy technicians and is sponsored by Postgraduate Healthcare Education, LLC (PHE). This activity will discuss the use of naloxone for opioid overdoses, including its mechanism of action, dosage forms, administration, and the necessary precautions while giving naloxone to a person who has overdosed.



# Naloxone Training and Resources for Pharmacists continued...

## Resources for Patients

- [Naloxone Training](#) - Reversing opioid overdoses with lifesaving naloxone.
- [Oregon Good Samaritan Law](#) - In Oregon, the Good Samaritan Law protects individuals from civil liability when administering naloxone during an opioid overdose or providing other emergency assistance in good faith.
- [Reverse Overdose Oregon](#) - Learn how and where to purchase naloxone in Oregon and access training tools for you individually or for a team.
- [CDC Podcast Lifesaving Naloxone](#) - A CDC podcast on the effectiveness and importance of carrying naloxone to reverse opioid overdoses.
- [Where you can buy OTC Narcan](#) - Where NARCAN® Nasal Spray can be purchased online from various retailers or found at local stores.

## Free or Reduced Naloxone Access

- [Max's Mission](#) - A nonprofit organization, Max's Mission offers free overdose education and naloxone distribution at regularly scheduled events in Jackson and Josephine Counties where free naloxone is distributed.
- [Project Red Initiative](#) - Project RED works across Oregon to distribute free naloxone, overdose prevention supplies, education, and trainings to those facing barriers to access.
- [Oregon County Service Summary](#) - This document provides county-specific snapshots of overdose-related services and projects across Oregon. This includes information about Oregon's syringe service and harm reduction programs which provide syringe and naloxone access, in addition to referrals, case management, and health services.

## Signage

- [Prevent and Protect Patient Posters](#): These customizable posters can be downloaded as a PowerPoint file and printed for a wide variety of uses.
- [University of Waterloo Naloxone Posters, Cards, and Checklists](#) - Naloxone and opioid resources developed by the School of Pharmacy at the University of Waterloo, includes counseling checklists, posters and cards, and FAQ one-pagers.

