

The Nursing Care Quality Assurance Commission (NCQAC) issues this advisory opinion in accordance with WAC 246-840-800. An advisory opinion adopted by the NCQAC is an official opinion about safe nursing practice. The opinion is not legally binding and does not have the force and effect of a duly promulgated regulation or a declaratory ruling by the NCQAC. Institutional policies may restrict practice further in their setting and/or require additional expectations to assure the safety of their patient and/or decrease risk. This advisory opinion does not address state or federal proclamations or rule waivers that temporarily change some regulatory requirements in emergency or disaster situations.

## Advisory Opinion: Opioid Use Disorder Medication Assisted Treatment – Nurse Care Managers and Scope of Practice

### Purpose

This advisory opinion provides guidance and clarification about the roles and responsibilities of the registered nurse (RN) care manager and the use of standing orders for patients receiving medication assisted treatment (MAT) for opioid use disorder, such as buprenorphine, methadone, and naltrexone.

### Background

On December 29, 2022, Congress eliminated the DATA-Waiver Program that required registration to prescribe buprenorphine for Medication Assisted Treatment (MAT). ([Removal of DATA Waiver \(X-Waiver\) Requirement | SAMHSA](#)). Federal law requires a Drug Enforcement Administration (DEA) registration to prescribe controlled substances. The DEA and SAMSHA are actively working on new training requirements for all prescribers that will go into effect June 21, 2023.

The DEA interprets that it is not within the scope of the RN to perform the initial assessment following standing orders. The [HR 6353 - Ryan Haight Online Pharmacy Consumer Protection Act of 2008](#) requires an in-person medical evaluation by a qualified practitioner before prescribing medications for MAT. The act currently allows for controlled substance prescriptions via telehealth only in certain circumstances:

- Patient is being presented in a DEA-registered hospital or clinic.
- Non-DEA registered facility or provider where patients might seek access to a remote provider. An example is a patient who is seen by an advanced registered nurse practitioner (ARNP) who does not have the buprenorphine waiver. The ARNP can perform the initial evaluation required, and a qualified remote provider can prescribe the buprenorphine via telehealth.

### Statement of Scope

The Nursing Care Quality Assurance Commission determined it is within the scope of practice of an appropriately prepared and competent registered nurse care manager to follow approved standing orders for patients receiving medication assisted treatment (MAT) for opioid use disorder such as buprenorphine, methadone, and naltrexone after the initial assessment.



NCAO 16.01 Opioid Use Disorder – MAT: Nurse Care Managers and Scope of Practice  
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Rescinded:  
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## Requirements and Recommendations

1. The nurse must understand the Federal and State laws and rules relevant to MAT.
2. The nurse must be trained and competent to provide care in addiction management skills.
3. The nurse must follow clinical practice standards.
4. The nurse must follow standing orders, using nursing judgment and consult with a health care practitioner as appropriate.
5. The nurse must document care following best practices.
6. The nurse should promote a team environment in which nurses and other health care practitioners work to improve the care provided to opioid addicted individuals, including screening, assessment, induction, stabilization, maintenance, monitoring, addiction counseling, and relapse prevention services.

## References and Resources

[RCW 18.79 Nursing Care](#)

[WAC 246-840 Practical and Registered Nursing](#)

[Support for Practicing Nurses | Nursing Care Quality Assurance Commission \(wa.gov\)](#)

[Practice Guidance | Nursing Care Quality Assurance Commission \(wa.gov\)](#)

[Practice Information | Nursing Care Quality Assurance Commission \(wa.gov\)](#)

[Ryan Haight Online Pharmacy Consumer Protection Act of 2008](#)

[The Controlled Substances Act \(dea.gov\)](#)

[Medication-Assisted Treatment \(MAT\) | SAMHSA](#)

[Removal of DATA Waiver \(X-Waiver\) Requirement | SAMHSA](#)

[Telemedicine and Prescribing Buprenorphine for the Treatment of Opioid Use Disorder \(hhs.gov\)](#)

[DEA's Commitment to Expanding Access to Medication-Assisted Treatment](#)