

**DATE:** August 11, 2025

**TO:** Kathleen Buchli, Code Reviser

**FROM:** Tami Thompson, Deputy Director of Regulatory Affairs



**SUBJECT:** Withdrawal of WSR 24-04-066, CR-101 for WAC 246-853-661, 246-853-730, and 246-853-755, general provisions for opioid prescribing and tapering rules.

This memo serves as notice that the Board of Osteopathic Medicine and Surgery (board) is withdrawing the CR-101 for general provisions for opioid prescribing and tapering rules, which was filed February 01, 2024, and published under WSR 24-04-066.

The board has decided to withdraw this CR101 and will reconsider a new rule project with an expanded scope related to opioid prescribing to align with the Washington Medical Commission's (WMC) recently filed CR101 related to opioid prescribing.

The board initially filed WSR 24-04-066 to consider amendments exempting patients with certain health conditions from opioid prescribing requirements. The purpose of this rule project was to align with the recently updated CDC guidelines and subsequent rule amendments by the WMC.

Since the official filing of the board's CR101 under WSR 24-04-066, the WMC received a formal rules petition to consider additional amendments to their general opioid prescribing rules. In response to the petition, the WMC filed a CR101 on April 30th, 2025 under WSR 25-10-039 to consider updates to all opioid prescribing rule sections for allopathic physicians and physician assistants.

The board works to remain consistent with the WMC, as osteopathic physicians and allopathic physicians regularly provide care in the same settings. Maintaining consistency with the WMC makes rules easier to apply standards in the complex health care regulatory environment and for licensees to understand.

OFFICE OF THE CODE REVISER  
STATE OF WASHINGTON  
FILED

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**WSR 25-17-019**

To remain consistent with the WMC's rule updates, the board has decided to withdraw their current CR-101 and reconsider opening rules with a more expanded scope to all opioid prescribing sections, once the WMC has concluded their project. Individuals requiring information on this rule should contact Becky McElhiney, at [osteopathic@doh.wa.gov](mailto:osteopathic@doh.wa.gov).

Thank you for your attention to this matter.

cc: Becky McElhiney, Program Manager