



# PREPROPOSAL STATEMENT OF INQUIRY

**CR-101 (October 2017)**  
**(Implements RCW 34.05.310)**

Do **NOT** use for expedited rule making

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**DATE: July 08, 2025**

**TIME: 1:16 PM**

**WSR 25-15-033**

**Agency:** Department of Health – Board of Nursing

**Subject of possible rule making:** Advanced practice and pain management rules. The Washington State Board of Nursing (board) is considering amendments to WAC 246-840-010 and 246-840-300 through 246-840-4990 to clarify advanced practice licensure requirements, align standards with national best practices, update prescriptive authority provisions, and address other related objectives.

This rulemaking is Phase 2 of the board's review of chapter 246-840 WAC, conducted in accordance with the board's five-year formal rule review process under RCW 43.70.041. The overall goal of this review is to clarify and update outdated language, rewrite and reformat existing rules to reflect current best practices, and restructure sections as necessary.

**Statutes authorizing the agency to adopt rules on this subject:** RCW 18.79.110, 18.79.800, and 43.70.041.

**Reasons why rules on this subject may be needed and what they might accomplish:**

WAC 246-840-010 and 246-840-300 through 246-840-4990 have been amended at various times over the past decade. Incremental updates have resulted in inconsistencies, structural gaps, and outdated terminology. Feedback from the board's Advanced Practice Subcommittee, community members, and professional organizations has identified the need to conduct rulemaking to address specific issues. This rulemaking will improve consistency, eliminate outdated language, and ensure that the rules reflect current best practices and align with national standards.

RCW 43.70.041 requires a formal review process of existing rules every five years to simplify, improve, and streamline rules pertaining to health professions. As part of this review process, the board is considering amendments to advanced practice and pain management rules.

**Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies:** None

**Process for developing new rule (check all that apply):**

- ☐ Negotiated rule making
- ☐ Pilot rule making
- ☐ Agency study
- ☒ Other (describe) Collaborative rulemaking

**Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:**

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(If necessary)

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Web site: [www.nursing.wa.gov](http://www.nursing.wa.gov)  
Other: None

TTY:  
Email:  
Web site:  
Other:

Additional comments: The board will notify interested parties of rulemaking by posting information on the Department of Health website, the board website, and by use of GovDelivery. Interested parties may sign up to receive board rulemaking notices at <https://public.govdelivery.com/accounts/WADOH/subscriber/new>. The board will hold virtual meetings at varying times to encourage participation.

**Date:** July 8, 2025

**Name:** Alison Bradywood DNP, MN/MPH, RN, NEA-BC

**Title:** Executive Director, Board of Nursing

**Signature:**

