Report to the Legislature

2023-25 Uniform Disciplinary Act Report

December 2025

RCW 18.130.310

Prepared by
Health Systems Quality Assurance

Washington State Department of HEALTH

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Executive Summary

RCW 18.130.310 of the Uniform Disciplinary Act (UDA) requires the Department of Health (department) to submit a biennial report to the legislature on disciplinary proceedings during the biennium that includes data on complaints, investigations, adjudications, and manner of disposition; background check activities; attorney and investigator case distribution; and optional health profession board and commission supplemental reports.

This biennial report includes data for the 2023-2025 biennium.

Complaints, investigations, and adjudications

During the biennium, there were a total of 32,441 complaints.[1] The department completed investigations on 8,229, or 25 percent, of these complaints. The investigations resulted in disciplinary action on five percent of the complaints.

Background check activities

The department:

- Conducted background checks on 178,594 applicants,
- Received WATCH reports (Washington State Patrol records of criminal convictions in Washington) on 4,217 applicants, and
- Denied a license or granted a license with conditions on 159 applicants based on the results of a background check.

Of the 4,217 applicants for which the department received WATCH reports, only 1,968 (47%) disclosed the criminal history on their applications. As this data shows, background checks are key to identifying applicants who may not be able to practice safely based on criminal or disciplinary history.

Attorney and investigator case distribution

The number of cases for each investigator and staff attorney varies greatly due to several factors, including the nature and complexity of the complaint and the professions' regulations. Some cases require significant investigative and legal work. Because of this, numbers ranged from 1 to 262 cases per attorney and 1 to 308 investigations per investigator during the biennium.

[1] This number includes those carried over from the last biennium.

Background

Reporting requirement

The Uniform Disciplinary Act (UDA) provides a legal and policy framework for the regulation and oversight of health care providers in Washington, including disciplinary activities. RCW 18.130.310 requires the Department of Health (department) to submit a biennial report to the legislature on its proceedings during the biennium, including:

- The number of complaints made, investigated, and adjudicated, and manner of disposition.
- Data on the department's background check activities conducted under RCW 18.130.064 and the effectiveness of those activities in identifying potential license holders who may not be qualified to practice safely.
- A summary of the distribution of the number of cases assigned to each attorney and investigator for each profession, keeping the identities of the attorneys and investigators anonymous.
- May include recommendations for improving the disciplinary process, including proposed legislation.
- May include health professions board and commission supplemental reports that cover disciplinary activities, rulemaking and policy activities, and receipts and expenditures for the individual disciplining authority.

Disciplining authority

The department regulates individual health care providers and health care facilities to protect patients in Washington state. All health care providers under the department's authority are under the UDA.[2] Most facilities are regulated by the secretary of health under separate regulatory authorities and are not included in this report. However, a few fall under the UDA, including pharmacies, other pharmaceutical firms, and humane societies, and are included in this report.

The department shares licensing and disciplining authority with 17 boards and commissions and twelve advisory committees. Of these, the Washington Medical Commission (WMC), Washington State Board of Nursing (WABON), and Chiropractic Quality Assurance Commission (CQAC) have greater authority over their credentialing, investigative, and disciplinary functions. The Board of Massage shares authority with the department over massage therapist regulation, with the secretary of health having authority over licensing and discipline and the board

[2] The only exception is medical cannabis consultants, who are regulated under chapter 69.51A RCW, Medical Cannabis.

overseeing licensure examinations, continuing education, and substantial equivalency standards with other states.

The UDA grants authority to the secretary of health, boards, and commissions to implement the law, including the development of rules to set professional standards for the profession. It also grants the department, boards, and commissions the authority to enforce laws that assure the public of the professional competence and conduct of the health care providers and ensure they can practice with reasonable skill and safety. See Appendix A for definitions of regulatory terms used in this report.

Licensee Data and Updates

The department has made some adjustments to how we count the official number of health professions to address newly added professions and historical inconsistencies. For example, staff pulled pharmacies/other pharmaceutical firms and humane societies out of the profession count since they are not health professionals, though they are regulated under the UDA and are included in this report. We also separated out some professions that had been historically counted together, like dietitians and nutritionists, and the multiple categories of medical assistants.[3]

The department regulates more than 590,000 health care professionals in 101 professions.[4] In addition, 10,000 pharmacies and other pharmaceutical firms, and 31 humane societies hold licenses to practice under the UDA.

There were several legislative changes to health profession credentials and disciplinary authority over the last biennium. These were:

- Implementation of eight new professions: certified peer specialist and peer specialist trainee,[5] behavioral health support specialist, birth doula, music therapists, medical assistant-EMT, and two new categories of agency affiliated counselor (certified and licensed).
- Chapter 94, laws of 2024 created a new radiologic technologist specialty, magnetic resonance imaging technologist. The department implemented rules for this credential, which went into effect July 24, 2025.

[3] Please note that these adjustments were not made to the data tables in this iteration of the report as the data is backward looking, but will be made in future iterations. See Appendix B for the official list of 101 health professions.

[4] A net increase of eight professions after making the adjustments described above.

[5] Chapter 360, laws of 2025 renamed these credentials to certified peer support specialist and trainee and this name change is being implemented through department rulemaking. These professions are not included in Appendix B Licensee Counts because the rulemaking for these professions was effective July 1, 2025, which is outside this UDA reporting period.

- Chapter 371, laws of 2024 created a licensed psychological associate credential, effective October 1, 2025. The rulemaking to implement this credential is currently in progress.
- Chapter 239, laws of 2024, at the request of WABON, changes the title "advanced registered nurse practitioner" to "advanced practice registered nurse" effective June 30, 2027.

Complaints, Investigations, Adjudication, and Disposition

Complaints

Most disciplinary activity starts with a complaint from the public, practitioners, or facilities. The department, boards, and commissions may also open complaints based on media accounts or information from law enforcement.

Figure 1: Total complaints for the 2023-25 Biennium

Carried Over from FY23	New Complaints Filed	Total Complaints
4,074	28,367	32,441

Investigations

When the department, boards, or commissions receive a complaint regarding a healthcare provider, they review it to decide if the incident or event, if substantiated, would violate the law and if they have the legal authority to act. If these two conditions are not met, the file is closed below the threshold and no further action is taken. If they determine the allegation might be a violation, and there is legal authority to act, staff begin an investigation.

Complaints can also include those for unlicensed practice. These are complaints that an unlicensed person is providing health care that requires a license to practice. The secretary is responsible for investigating these cases.

Figure 2: Investigations completed during the 2023-25 Biennium

Licensed Investigations Completed	Unlicensed Investigations Completed	Total Investigations Completed
7,690	539	8,229

The department, boards, and commissions manage each case throughout the disciplinary process, working with investigators, staff attorneys, and the Office of the Attorney General to identify violations and evaluate evidence. If the evidence does not support the complaint, it is

closed. If violations are found, the case is presented to a panel of members from the department, board, or commission for approval to take disciplinary action.

Disciplinary Actions

Informal Actions

Disciplinary action can be formal or informal, with informal actions taken in cases that involve minimal risk of patient harm. Informal action begins with a statement of allegations (SOA), which sets forth the factual allegations against the healthcare professional and the potential violations of the UDA. A SOA is resolved through a stipulation to informal disposition (STID). A SOA and STID may be offered prior to serving a formal statement of charges if the case involves minimal risk of potential or actual patient harm and no pattern of violations.

If the license holder agrees to the STID, they do not admit unprofessional conduct but do agree to corrective action. Additional training is an example of corrective action.

Formal Actions

Formal disciplinary action begins with a statement of charges (SOC). The respondent must answer the charges in writing within 20 days or the board, commission, or department enters a default order.

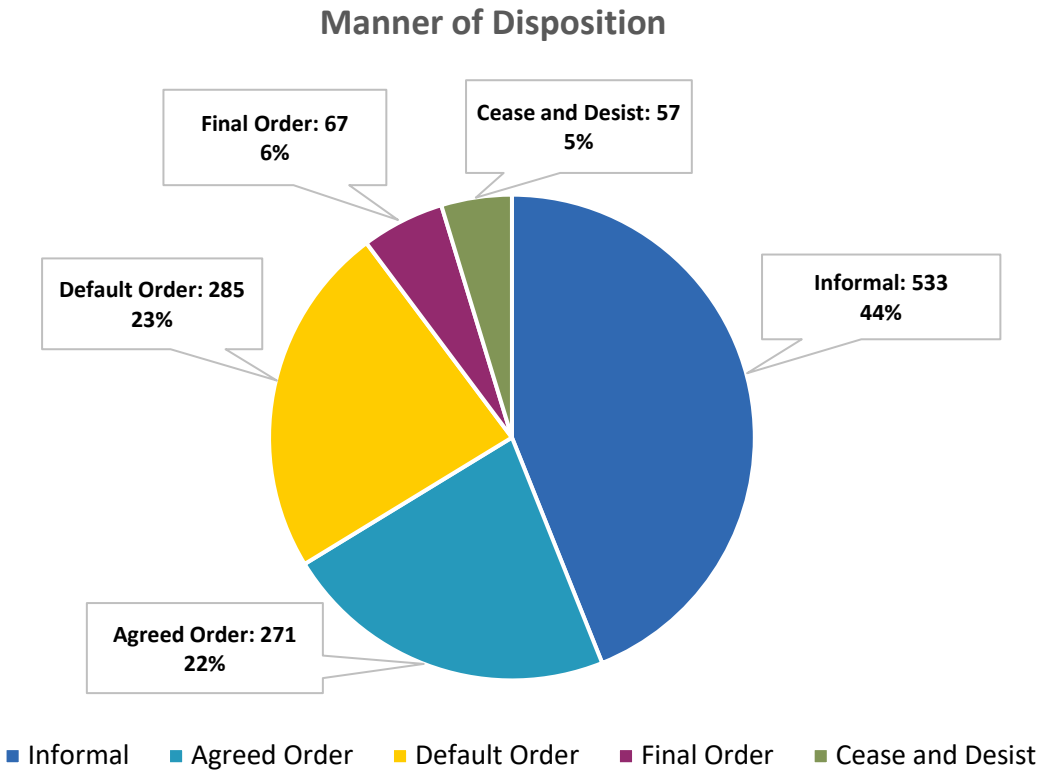
An SOC is resolved through the adjudicative process, which can result in one of the following:

- Agreed order: A document agreed upon by the license holder (and their attorney, if represented) and representatives from the department, which includes any sanctions or conditions regarding practice. The agreed order becomes final if the disciplining authority approves it. This is called a stipulated findings of facts, conclusion of law, and agreed order.
- Final order: A document issued as a result of a formal hearing. This is called a findings of fact, conclusions of law, and final order.
- Default order: A final order issued when the disciplining authority has notified a license holder of allegations and the license holder failed to answer or participate in the adjudicative process.

In addition, the department can issue a cease and desist order for unlicensed practice of a health profession. This order requires the person to stop the unlicensed activity and may include a fine. Continued unlicensed practice may result in court enforcement of the cease and desist order or criminal prosecution.

The department, boards, and commissions took disciplinary action on four percent (1,213) of the total 32,450 complaints on all professions.[6] Figure 3 provides a breakdown of disciplinary actions by the manner of disposition.

Figure 3: Summary of Case Disposition – 2023-25 Biennium



[6] Chart does not include notices of decision, issued when the disciplining authority denies an application for licensure or grants the license with conditions based on disciplinary actions or criminal conviction activity identified. These are discussed under Background Checks (page 14).

Data Tables

The following tables include detailed data by profession.

- Table 1 - Numbers of complaints and investigations by profession or facility
- Table 2 - Disciplinary actions for secretary professions
- Table 3 - Disciplinary actions for board and commission professions or facilities
- Table 4 - Manner of disposition by profession and program

Please note: The adjustments in how we count health professions discussed on page 3 will be made to the data tables in future iterations of the report.

Table 1: Complaints and Investigations by Profession or Program
2023-25 Biennium

Profession	Licensee Counts	Total Complaints	Licensed Investigations Completed	Unlicensed Practice Investigations Completed	Total Investigations Completed
Acupuncture & Eastern Medicine Pract.	1682	62	15	6	21
Advanced Emergency Medical Technician	355	2	1	0	1
Advanced Registered Nurse Practitioner	17756	1192	292	5	297
Animal Massage Practitioner	161	13	1	7	8
Athletic Trainer	905	18	7	5	12
Audiologist	582	8	5	0	5
Birth Doula	365	2	0	0	0
Cardiovascular Invasive Specialist	400	5	4	0	4
Certified Behavior Technician	4368	78	22	2	24
Chiropractic X-Ray Technician	194	0	0	0	0
Chiropractor	2649	281	134	7	141
Colon Hydrotherapist	13	0	0	0	0
Counselor, Agency Affiliated	12720	932	350	9	359
Counselor, Certified	289	52	20	2	22
Counselor, Certified Advisor	0	0	0	0	0
Dental Anesthesia Assistant	309	1	0	0	0
Dental Assistant	17804	247	54	15	69
Dental Hygienist	6937	46	9	10	19
Dentist	8292	1380	460	16	476
Denturist	164	36	15	2	17
Dietitian/Nutritionist	2799	28	13	0	13
Dispensing Optician	959	10	1	1	2
Dispensing Optician Apprentice	962	11	1	1	2
Emergency Medical Responder	210	1	0	0	0
Emergency Medical Technician	14258	136	35	4	39
Expanded Function Dental Auxiliary	483	3	0	0	0
Genetic Counselor	580	0	0	0	0
Hearing Aid Specialist	352	18	13	0	13
Home Care Aide	36899	2572	438	8	446
Humane Society	31	2	0	0	0
Hypnotherapist	669	30	5	0	5
Licensed Assistant Behavior Analyst	293	5	1	0	1
Licensed Behavior Analyst	1366	45	23	0	23
Licensed Practical Nurse	10494	1021	238	7	245
Marriage & Family Therapist	2838	152	58	3	61
Marriage & Family Therapist Associate	870	69	21	1	22
Massage Therapist	11661	631	169	73	242
Medical Assistant	43199	808	127	19	146
Medical Program Director	34	3	1	0	1

Profession	Licensee Counts	Total Complaints	Licensed Investigations Completed	Unlicensed Practice Investigations Completed	Total Investigations Completed
Medical Program Director Delegate	1631	0	0	0	0
Medication Assistant	95	9	0	0	0
Mental Health Counselor	11765	663	214	20	234
Mental Health Counselor Associate	3463	287	105	1	106
Midwife	223	58	24	5	29
Music Therapist	62	2	0	0	0
Naturopathic Physician	1659	125	47	4	51
Nursing Assistant	94182	6931	866	21	887
Nursing Home Administrator	401	232	56	2	58
Nursing Pool Operator	487	8	6	0	6
Nursing Technician	1139	19	4	0	4
Occupational Therapist	4657	55	19	0	19
Occupational Therapy Assistant	1198	27	5	0	5
Ocularist	11	0	0	0	0
Optometrist	1834	92	28	2	30
Orthotist/ Prosthetist	366	5	3	0	3
Osteopathic Physician	4498	565	127	0	127
Osteopathic Physician Assistant*	0	1	0	0	0
Paramedic	3241	76	27	1	28
Pharmacies/Pharmaceutical Firms	10446	709	174	15	189
Pharmacist	11733	680	195	70	265
Pharmacy Assistant	10793	183	40	3	43
Pharmacy Technician	9825	133	40	6	46
Physical Therapist	9260	168	51	1	52
Physical Therapist Assistant	2630	46	13	2	15
Physician	37273	4128	929	62	991
Physician Assistant	5850	524	143	3	146
Podiatric Physician	421	70	27	0	27
Psychologist	4100	239	92	10	102
Radiological Technologist	7937	49	10	4	14
Radiologist Assistant	9	1	0	0	0
Recreational Therapist	143	8	0	0	0
Reflexologist	237	0	0	0	0
Registered Nurse	111956	4366	1100	53	1153
Respiratory Care Practitioner	3527	45	14	1	15
Retired Volunteer Medical Worker	446	1	0	0	0
Sex Offender Treatment Provider	94	24	6	0	6
Sex Offender Treatment Provider Affiliate	13	2	0	0	0
Social Worker Advanced	138	24	0	3	3
Social Worker Associate Advanced	400	23	10	0	10
Social Worker Assoc. Independent Clin.	3530	172	61	1	62
Social Worker Independent Clinical	8907	304	98	2	100
Speech Language Pathologist	4312	29	13	1	14
Speech Language Pathology Assistant	346	0	0	0	0

Profession	Licensee Counts	Total Complaints	Licensed Investigations Completed	Unlicensed Practice Investigations Completed	Total Investigations Completed
Substance Use Disorder Professional	3263	416	177	6	183
Substance Use Disorder Prof. Trainee	1485	388	156	2	158
Surgical Technologist	4013	39	11	0	11
Veterinarian	4792	463	218	20	238
Veterinary Medication Clerk	2667	45	13	9	22
Veterinary Technician	2786	61	28	5	33
X-Ray Technician	1792	46	7	1	8
Totals	600938	32441	7690	539	8229

*Osteopathic PAs are now under the WMC's authority with allopathic PAs but there is one remaining complaint against an osteopathic PA.

Table 2: Disciplinary Actions – Secretary Professions
2023-25 Biennium

Profession	Carry Over from FY23	Complaints Received	Total Complaints	Total Disciplinary Action	% of Profession Disciplinary Actions	% of All Secretary Disciplinary Actions
Acupuncture & Eastern Medicine Pract.	8	54	62	6	10%	1%
Advanced Emergency Medical Technician	0	2	2	0	0%	0%
Animal Massage Practitioner	4	9	13	3	23%	0%
Athletic Trainer	1	17	18	1	6%	0%
Birth Doula	0	2	2	0	0%	0%
Cardiovascular Invasive Specialist	3	2	5	1	20%	0%
Certified Behavior Technician	19	59	78	8	10%	1%
Colon Hydrotherapist	0	0	0	0	0%	0%
Counselor, Agency Affiliated	151	781	932	127	14%	15%
Counselor, Certified	9	43	52	1	2%	0%
Counselor, Certified Advisor	0	0	0	0	0%	0%
Dental Hygienist	6	40	46	1	2%	0%
Dietitian/Nutritionist	3	25	28	1	4%	0%
Dispensing Optician	1	9	10	1	10%	0%
Dispensing Optician Apprentice	0	11	11	5	45%	1%
Emergency Medical Responder	0	1	1	0	0%	0%
Emergency Medical Technician	19	117	136	19	14%	2%
Genetic Counselor	0	0	0	0	0%	0%
Home Care Aide	206	2366	2572	94	4%	11%
Hypnotherapist	9	21	30	2	7%	0%
Licensed Assistant Behavior Analyst	1	4	5	1	20%	0%
Licensed Behavior Analyst	11	34	45	1	2%	0%
Marriage and Family Therapist	23	129	152	11	7%	1%
Marriage and Family Therapist Associate	16	53	69	8	12%	1%
Massage Therapist	124	507	631	87	14%	10%
Medical Assistant	88	720	808	65	8%	8%
Medical Program Director	0	3	3	0	0%	0%
Medical Program Director Designee	0	0	0	0	0%	0%
Medication Assistant Endorsement	1	8	9	0	0%	0%
Mental Health Counselor	120	543	663	36	5%	4%
Mental Health Counselor Associate	72	215	287	21	7%	3%
Midwife	16	42	58	4	7%	0%
Music Therapist	0	2	2	0	0%	0%
Nursing Assistant	523	6408	6931	175	3%	21%
Nursing Pool Operator	2	6	8	2	25%	0%
Ocularist	0	0	0	0	0%	0%
Orthotist/ Prosthetist	2	3	5	0	0%	0%
Paramedic	11	65	76	9	12%	1%
Radiological Technologist	10	39	49	3	6%	0%
Radiologist Assistant	0	1	1	0	0%	0%

Profession	Carry Over from FY23	Complaints Received	Total Complaints	Total Disciplinary Action	% of Profession Disciplinary Actions	% of All Secretary Disciplinary Actions
Recreational Therapist	2	6	8	0	0%	0%
Reflexologist	0	0	0	0	0%	0%
Respiratory Care Practitioner	5	40	45	4	9%	0%
Retired Volunteer Medical Worker	0	1	1	0	0%	0%
Sex Offender Treatment Provider	5	19	24	2	8%	0%
Sex Offender Treatment Provider Affiliate	0	2	2	0	0%	0%
Social Worker Advanced	2	22	24	2	8%	0%
Social Worker Associate Advanced	4	19	23	2	9%	0%
Social Worker Associate Independent Clin.	29	143	172	6	3%	1%
Social Worker Independent Clinical	37	267	304	12	4%	1%
Substance Use Disorder Professional	75	341	416	29	7%	3%
Substance Use Disorder Professional Trainee	78	310	388	72	19%	9%
Surgical Technologist	1	38	39	5	13%	1%
X-Ray Technician	6	40	46	2	4%	0%
Totals	**1703**	**13589**	**15292**	**829**	**5.42%**	**100%**

Table 3: Disciplinary Actions – Boards and Commissions

Profession	Carry Over from FY23	Complaints Received	Total Complaints	Total Disciplinary Action	% of B/C Disciplinary Action	% of All B/C Disciplinary Action
Advanced Registered Nurse Practitioner	129	1063	1192	28	2%	4%
Audiologist	2	6	8	0	0%	0%
Chiropractic X-Ray Technician	0	0	0	0	0%	0%
Chiropractor	96	185	281	30	11%	4%
Dental Anesthesia Assistant	0	1	1	0	0%	0%
Dental Assistant	20	227	247	38	15%	5%
Dentist	275	1105	1380	83	6%	11%
Denturist	2	34	36	2	6%	0%
Expanded Function Dental Auxiliary	1	2	3	1	33%	0%
Hearing aid Specialist	2	16	18	2	11%	0%
Humane Society	0	2	2	0	0%	0%
Licensed Practical Nurse	102	919	1021	47	5%	6%
Naturopathic Physician	20	105	125	6	5%	1%
Nursing Home Administrator	33	199	232	5	2%	1%
Nursing Technician	3	16	19	3	16%	0%
Occupational Therapist	7	48	55	7	13%	1%
Occupational Therapy Assistant	3	24	27	2	7%	0%
Optometrist	10	82	92	0	0%	0%
Osteopathic Physician	97	468	565	13	2%	2%
Osteopathic Physician Assistant*	1	0	1	0	0%	0%
Pharmacies/Pharmaceutical Firms	107	602	709	5	1%	1%
Pharmacist	128	552	680	33	5%	4%
Pharmacy Assistant	34	149	183	25	14%	3%
Pharmacy Technician	39	94	133	16	12%	2%
Physical Therapist	22	146	168	8	5%	1%
Physical Therapist Assistant	5	41	46	2	4%	0%
Physician	396	3732	4128	131	3%	17%
Physician Assistant	51	473	524	26	5%	3%
Podiatric Physician	20	50	70	6	9%	1%
Psychologist	60	179	239	18	8%	2%
Registered Nurse	592	3774	4366	205	5%	26%
Speech Language Pathologist	3	26	29	1	3%	0%
Speech Language Pathology Assistant	0	0	0	0	0%	0%
Veterinarian	83	380	463	34	7%	4%
Veterinary Medication Clerk	13	32	45	9	20%	1%
Veterinary Technician	15	46	61	3	5%	0%
Totals	**2371**	**14778**	**17149**	**789**	**4.60%**	**100%**

*Osteopathic PAs are now under the WMC's authority with allopathic PAs but there is one remaining complaint against an osteopathic PA.

Table 4: Manner of Disposition – All Professions and Programs
2023-25 Biennium

Profession	Informal Disposition	Agreed Order	Default Order	Final Order	Notice of Decision	Cease and Desist	Total
Acupuncture & Eastern Medicine Pract.	0	2	0	1	0	3	6
Advanced Emergency Medical Tech.	0	0	0	0	0	0	0
Advanced Registered Nurse Pract.	7	8	10	0	3	0	28
Animal Massage Practitioner	0	0	0	0	0	3	3
Athletic Trainer	1	0	0	0	0	0	1
Audiologist	0	0	0	0	0	0	0
Cardiovascular Invasive Specialist	1	0	0	0	0	0	1
Certified Behavior Technician	2	0	0	0	5	1	8
Chiropractic X-Ray Technician	0	0	0	0	0	0	0
Chiropractor	6	13	3	5	1	2	30
Counselor, Agency Affiliated	22	13	13	3	76	0	127
Counselor, Certified	0	0	1	0	0	0	1
Counselor, Certified Advisor	0	0	0	0	0	0	0
Dental Anesthesia Assistant	0	0	0	0	0	0	0
Dental Assistant	11	2	3	0	22	0	38
Dental Hygienist	1	0	0	0	0	0	1
Dentist	56	18	5	3	1	0	83
Denturist	1	0	0	0	0	1	2
Dietitian/Nutritionist	1	0	0	0	0	0	1
Dispensing Optician	0	0	0	0	1	0	1
Dispensing Optician Apprentice	0	0	0	0	5	0	5
Emergency Medical Responder	0	0	0	0	0	0	0
Emergency Medical Technician	10	3	4	0	2	0	19
Expanded Function Dental Auxiliary	1	0	0	0	0	0	1
Genetic Counselor	0	0	0	0	0	0	0
Hearing aid Specialist	0	1	1	0	0	0	2
Home Care Aide	17	4	15	1	57	0	94
Humane Society	0	0	0	0	0	0	0
Hypnotherapist	1	1	0	0	0	0	2
Licensed Assistant Behavior Analyst	1	0	0	0	0	0	1
Licensed Behavior Analyst	0	0	0	0	1	0	1
Licensed Practical Nurse	12	9	14	0	11	1	47
Marriage & Family Therapist	5	2	1	1	1	1	11
Marriage & Family Therapist Assoc.	4	3	1	0	0	0	8
Massage Therapist	25	16	15	4	6	21	87
Medical Assistant	18	5	12	2	25	3	65
Medical Marijuana Consultant	0	0	0	0	0	0	0
Medication Assistant Endorsement	0	0	0	0	0	0	0
Mental Health Counselor	18	9	3	2	3	1	36
Mental Health Counselor Associate	7	4	2	2	6	0	21
Midwife	2	0	1	0	0	1	4
Naturopathic Physician	4	1	0	0	0	1	6
Nursing Assistant	38	39	62	6	30	0	175

Profession	Informal Disposition	Agreed Order	Default Order	Final Order	Notice of Decision	Cease and Desist	Total
Nursing Home Administrator	0	1	0	0	4	0	5
Nursing Pool Operator	0	0	0	2	0	0	2
Nursing Technician	0	0	0	0	3	0	3
Occupational Therapist	3	2	0	0	2	0	7
Occupational Therapy Assistant	1	1	0	0	0	0	2
Ocularist	0	0	0	0	0	0	0
Optometrist	0	0	0	0	0	0	0
Orthotist/ Prosthetist	0	0	0	0	0	0	0
Osteopathic Physician	8	3	0	0	2	0	13
Osteopathic Physician Assistant	0	0	0	0	0	0	0
Paramedic	4	0	5	0	0	0	9
Pharmacies/Pharmaceutical Firms	0	1	0	2	1	1	5
Pharmacist	18	3	7	2	3	0	33
Pharmacy Assistant	3	1	4	1	16	0	25
Pharmacy Technician	5	4	5	1	1	0	16
Physical Therapist	2	2	3	1	0	0	8
Physical Therapy Assistant	1	0	1	0	0	0	2
Physician	61	25	21	14	6	4	131
Physician Assistant	18	7	1	0	0	0	26
Podiatric Physician	0	6	0	0	0	0	6
Psychologist	14	0	1	0	1	2	18
Radiological Technologist	1	1	1	0	0	0	3
Radiologist Assistant	0	0	0	0	0	0	0
Recreational Therapist	0	0	0	0	0	0	0
Reflexologist	0	0	0	0	0	0	0
Registered Nurse	64	39	58	4	39	1	205
Respiratory Care Practitioner	1	1	1	0	1	0	4
Retired Volunteer Medical Worker	0	0	0	0	0	0	0
Sex Offender Treatment Provider	0	0	0	0	1	1	2
Sex Offender Treatment Provider Affiliate	0	0	0	0	0	0	0
Social Worker Advanced	0	0	0	0	0	2	2
Social Worker Associate Advanced	1	0	0	0	1	0	2
Social Worker Assoc. Independent Clin.	3	0	1	1	1	0	6
Social Worker Independent Clinical	3	4	2	1	2	0	12
Speech Language Pathologist	1	0	0	0	0	0	1
Speech Language Pathology Assistant	0	0	0	0	0	0	0
Substance Use Disorder Professional	11	7	1	2	8	0	29
Substance Use Disorder Prof. Trainee	10	5	5	3	49	0	72
Surgical Technologist	1	2	0	0	2	0	5
Veterinarian	23	3	0	2	1	5	34
Veterinary Medication Clerk	2	0	0	0	5	2	9
Veterinary Technician	2	0	0	1	0	0	3
X-Ray Technician	0	0	2	0	0	0	2
Totals	**533**	**271**	**285**	**67**	**405**	**57**	**1618**

Background Checks

RCW 18.130.310 requires the department to provide data on background check activities conducted under RCW 18.130.064 and the effectiveness of those activities in identifying potential license holders who may not be qualified to practice safely.

RCW 18.130.064 authorizes the department to receive criminal history record information and non-conviction data for determining the eligibility of applicants for licensure or renewal, or to determine whether to proceed with an investigation of a complaint against a license holder. It requires the department to conduct a state background check through the Washington State Patrol on all new applicants and conduct an annual review of a representative sample of all license holders.

The statute allows the department to include a fingerprint-based check where the state patrol background check is inadequate, such as out-of-state applicants or applicants with a criminal record in Washington.

Types of Background Checks

The department works with three databases to obtain criminal and disciplinary data on applicants. For all new applications, the background check process involves checking two separate databases:

- The Washington Access to Criminal History (WATCH) database is operated by the Washington State Patrol (WSP) and provides records of criminal convictions in the state of Washington.
- The National Practitioner Data Bank (NPDB) is administered by the U.S. Department of Health and Human Services to obtain disciplinary data from other states on all applicants. This national databank contains disciplinary information, including adverse actions, about health professionals.

For out-of-state applicants or applicants with a criminal history, the process includes an FBI fingerprint-based national background check through the FBI and WSP.

The FBI fingerprint process can be lengthy, especially when prints are unreadable and need to be re-collected. As a result, the department, boards, and commissions may grant temporary practice permits to applicants who satisfy all licensing requirements but are still awaiting FBI results to help improve access to care by avoiding delays. The temporary practice permit expires if criminal history is identified, and a notice of decision (NOD) is issued (see next page for more information on NODs).

Figure 4: DOH Background Check Activity Summary – 2023-25 Biennium

Total Applicants	178,594
Applicants with returned background reports	4,217
Cases opened on applicants with returned background reports	557
Applicants who disclosed criminal or disciplinary history (% of cases)	1,968 (43%)
Applicants not disclosing criminal or disciplinary history (% of cases)	2,249 (54%)
Actions taken to restrict or deny a license application	159

Disciplinary Action for Applicants

The department issues a NOD when the disciplining authority denies an application for licensure, or grants the license with conditions, pursuant to RCW 18.130.055. Common application issues include discipline in another state or criminal conviction activity identified on an application or found in a background check. The notice has detailed instructions for the applicant, which explains what to do if they want to contest the decision. This includes notice of the right to request a hearing on the decision to prove they are qualified and can practice safely. The department issued 405 NODs during the 2023-25 biennium.

Effectiveness of Background Check Activities

As the above table demonstrates, more than half of the applicants with returned background check reports did not disclose their criminal history on the application. We are unsure how many of these omissions were intentional. However, had we not conducted background checks, we would not have identified this history, and the applicants may have been fully licensed without conditions. This demonstrates that background checks were effective in identifying 159 potential license holders who may not be qualified to practice safely, and we were able to deny a license or grant a license with conditions to protect the public.

Table 5 shows details of background check activity by profession.

Table 5: Background Check Reports
2023-25 Biennium

Profession	Total Applicant Checks Made	WATCH Reports Generated	Cases Opened on Applicants	Self-disclosed?		% Disclosed	Actions Taken
				Yes	No		
Acupuncture and Eastern Medicine Pract.	153	2	0	2	0	100%	0
Advanced Emergency Medical Technician	84	2	0	2	0	100%	0
Advanced Registered Nurse Practitioner	6719	18	0	0	18	0%	0
Animal Massage Practitioner	51	0	0	0	0		0
Athletic Trainer	201	0	1	0	0		0
Audiologist	94	0	0	0	0		0
Birth Doula	367	5	0	3	2	60%	0
Cardiovascular Invasive Specialist	98	0	0	0	0		0
Certified Behavior Technician	3601	111	6	43	68	39%	1
Chiropractic Preceptor Trainee	0	0	0	0	0		0
Chiropractic X-Ray Technician	67	1	0	0	1	0%	0
Chiropractor	361	43	0	1	42	2%	0
Colon Hydrotherapist	4	0	0	0	0		0
Counselor, Agency Affiliated	10178	829	136	545	284	66%	48
Counselor, Certified	85	4	0	2	2	50%	0
Counselor, Certified Advisor	1	0	0	0	0		0
Dental Anesthesia Assistant	109	5	0	3	2	60%	0
Dental Assistant	6735	168	29	55	113	33%	6
Dental Hygienist	766	5	0	4	1	80%	0
Dentist	1100	3	1	0	3	0%	0
Denturist	28	1	0	1	0	100%	0
Dietitian/Nutritionist	777	5	0	2	3	40%	0
Dispensing Optician	81	3	1	3	0	100%	0
Dispensing Optician Apprentice	263	7	1	1	6	14%	0
Emergency Medical Responder	54	3	0	1	2	33%	0
Emergency Medical Technician	3985	81	5	50	31	62%	1
Expanded Function Dental Auxiliary	115	4	0	2	2	50%	0
Genetic Counselor	147	0	0	0	0		0
Hearing aid Specialist	53	3	0	2	1	67%	0
Home Care Aide	13259	405	31	145	260	36%	7
Hypnotherapist	169	11	0	6	5	55%	0
Licensed Assistant Behavior Analyst	225	6	0	5	1	83%	0
Licensed Behavior Analyst	420	2	0	2	0	100%	0
Licensed Practical Nurse	2443	31	8	2	29	6%	2
Marriage and Family Therapist	665	4	0	2	2	50%	0
Marriage and Family Therapist Associate	616	4	4	2	2	50%	0
Massage Therapist	1228	34	1	18	16	53%	0

Profession	Total Applicant Checks Made	WATCH Reports Generated	Cases Opened on Applicants	Self-disclosed?		% Disclosed	Actions Taken
				Yes	No		
Medical Assistant	15558	475	35	170	305	36%	11
Medical Program Director	0	0	0	0	0		0
Medication Assistant Endorsement	30	0	0	0	0		0
Mental Health Counselor	3646	19	2	12	7	63%	1
Mental Health Counselor Associate	2439	49	4	37	12	76%	1
Midwife	34	0	0	0	0		0
Music Therapist	64	0	0	0	0		0
Naturopathic Physician	150	2	0	1	1	50%	0
Nursing Assistant	38138	751	72	260	491	35%	20
Nursing Home Administrator	140	1	2	1	0	100%	1
Nursing Technician	1811	29	3	0	29	0%	1
Occupational Therapist	838	2	2	1	1	50%	1
Occupational Therapy Assistant	193	2	0	0	2	0%	0
Ocularist	2	0	0	0	0		0
Optometrist	174	0	0	0	0		0
Orthotist/ Prosthetist	49	0	0	0	0		0
Osteopathic Physician	1141	0	2	0	0		0
Osteopathic Physician Assistant	0	0	0	0	0		0
Paramedic	641	11	0	8	3	73%	0
Pharmacist	1199	3	1	1	2	33%	0
Pharmacy Assistant	6554	240	37	75	165	31%	8
Pharmacy Technician	1731	19	6	11	8	58%	0
Physical Therapist	1506	0	0	0	0		0
Physical Therapist Assistant	324	0	1	0	0		0
Physician	5299	5	0	0	5	0%	0
Physician Assistant	1313	0	0	0	0		0
Podiatric Physician	60	0	0	0	0		0
Psychologist	854	1	2	1	0	100%	0
Radiological Assistant	0	0	0	0	0		0
Radiological Technologist	1719	9	0	5	4	56%	0
Recreational Therapist	38	0	0	0	0		0
Reflexologist	19	0	0	0	0		0
Registered Nurse	23396	164	21	2	162	1%	4
Respiratory Care Practitioner	655	7	2	5	2	71%	1
Retired Volunteer Medical Worker	1	0	0	0	0		0
Sex Offender Treatment Provider	6	0	0	0	0		0
Sex Offender Treatment Provider Affiliate	4	1	0	0	1	0%	0
Social Worker Advanced	38	0	0	0	0		0
Social Worker Associate Advanced	353	8	3	4	4	50%	1
Social Worker Associate Independent Clin.	2219	66	2	51	15	77%	2
Social Worker Independent Clinical	2728	39	5	33	6	85%	0
Speech Language Pathologist	1092	2	2	2	0	100%	0
Speech Language Pathology Assistant	162	0	0	0	0		0

Profession	Total Applicant Checks Made	WATCH Reports Generated	Cases Opened on Applicants	Self-disclosed?		% Disclosed	Actions Taken
				Yes	No		
Substance Use Disorder Professional	486	133	16	115	18	86%	4
Substance Use Disorder Professional Trainee	1155	280	97	237	43	85%	34
Surgical Technologist	1456	31	5	8	23	26%	1
Veterinarian	706	0	0	0	0		0
Veterinary Medication Clerk	1644	35	10	15	20	43%	3
Veterinary Specialty License	3	0	0	0	0		0
Veterinary Technician	446	4	1	2	2	50%	0
X-Ray Technician	1078	29	0	7	22	24%	0
Totals	**178594**	**4217**	**557**	**1968**	**2249**	**46.7%**	**159**

Case Distribution to Investigators and Staff Attorneys

RCW 18.130.310 requires the department to "summarize the distribution of the number of cases assigned to each attorney and investigator for each profession." The law also requires that the identities of staff attorneys and investigators remain anonymous.

The number of cases for each investigator and staff attorney varies greatly due to several factors that may impact the amount of investigative and legal resources for a case (and how work is distributed). These factors include:

- The nature and complexity of the complaint,
- The complexity of the profession,
- Availability of records and other information,
- If there are companion cases with other professions,
- How many months the staff worked during the biennium, and
- Involvement of other entities, such as law enforcement.

Tables 6 and 7 provide case distributions by staff attorney and investigator. Numbers ranged from 1 to 262 cases per attorney and 1 to 308 investigations per investigator. Breakdowns by profession are not included in this biennium's report because we are evaluating our methods for producing this information accurately.

Please note on the following tables:

- To preserve anonymity, individual staff members are indicated by a number.
- The number of cases shown includes any case worked during the biennium.
- The number of cases shown differs from the number of cases received or closed since it includes cases at any point in the investigative or legal process.

Table 6: Distribution of Staff Attorney Caseload 2023-25 Biennium

Staff Attorney	Months Worked in Biennium	Number of Cases
1	24	194
2	24	22
3	24	124
4	24	168
5	24	142
6	17	120
7	22	200
8	17	131
9	3	1
10	24	1
11	24	210
12	24	103
13	3	22
14	24	134
15	24	127
16	24	201
17	13	132
18	24	46
19	24	160
20	24	262
21	24	148
22	24	1
23	24	140
24	23	90
25	18	1
26	16	41
27	24	108
28	24	32
29	24	135
30	1	10

Table 7: Distribution of Investigator Caseload 2023-25 Biennium

Investigator	Months Worked in Biennium	Number of Investigations
1	9	47
2	24	5
3	24	150
4	24	68
5	24	27
6	24	9
7	24	4
8	24	3
9	24	106
10	24	23
11	24	117
12	24	89
13	24	26
14	24	182
15	24	18
16	24	179
17	16	37
18	24	4
19	24	2
20	24	3
21	24	115
22	24	38
23	24	101
24	24	159
25	24	145
26	24	113
27	24	152
28	24	123
29	24	4
30	24	75
31	24	79
32	24	105
33	24	159
34	24	16
35	24	3
36	9	20
37	24	125
38	24	34
39	24	133
40	24	97

Investigator	Months Worked in Biennium	Number of Investigations
41	24	36
42	10	37
43	24	23
44	24	26
45	24	26
46	24	1
47	21	8
48	24	147
49	24	166
50	16	154
51	24	191
52	24	233
53	24	294
54	24	136
55	21	40
56	24	1
57	24	6
58	24	58
59	24	244
60	24	155
61	14	138
62	24	149
63	24	177
64	12	68
65	24	185
66	24	21
67	24	308
68	24	104
69	24	157
70	24	61
71	24	51
72	24	153
73	24	94
74	24	64
75	16	54
76	24	4
77	24	126
78	24	244
79	24	151
80	24	139
81	24	2
82	24	53
83	24	22

Investigator	Months Worked in Biennium	Number of Investigations
84	24	126
85	24	127
86	24	131
87	24	189
88	24	147
89	24	1
90	24	71
91	24	28
92	24	19
93	24	13
94	24	130

Appendices

Appendix A: Licensee Counts by Profession or Program

Profession or Facility	2013-15	2015-17	2017-19	2019-21	2021-23	2023-25
Acupuncture & Eastern Medicine Practitioner	1,387	1,537	1,606	1,560	1,571	1,682
Advanced Emergency Medical Technician	362	367	364	350	344	355
Advanced Registered Nurse Practitioner	6,404	7,759	9,169	11,311	14,011	17,756
Animal Massage Practitioner	59	81	108	112	138	161
Athletic Trainer	587	669	789	818	851	905
Audiologist	409	430	465	497	528	582
Behavioral Health Support Specialist[1]	-	-	-	-	-	0
Birth Doulas[1]	-	-	-	-	-	365
Cardiovascular Invasive Specialist	224	292	338	345	375	400
Certified Behavior Technician	-	-	2,435	3,491	3,802	4,368
Chiropractic X-Ray Technician	209	218	206	198	249	194
Chiropractor	2,467	2,534	2,605	2,598	2,545	2,649
Colon Hydrotherapist	-	-	-	-	20	13
Counselor, Agency Affiliated[2]	7,611	9,354	9,092	9,279	10,680	12,720
Counselor, Certified	630	550	471	391	353	289
Counselor, Certified Advisor	3	3	2	2	1	0
Dental Anesthesia Assistant	117	174	215	240	263	309
Dental Assistant	13,692	14,510	15,677	16,522	17,227	17,804
Dental Hygienist	6,056	6,332	6,526	6,666	6,753	6,937
Dentist	6,355	6,647	6,738	6,870	7,059	8,292
Denturist	143	145	156	144	150	164
Dietitian/Nutritionist	1,733	2,065	2,329	2,457	2,832	2,799
Dispensing Optician	1,048	1,012	1,006	982	944	959
Dispensing Optician Apprentice	966	1,051	1,051	1,001	1,009	962
Emergency Medical Responder	394	371	342	348	248	210
Emergency Medical Technician	12,870	13,032	13,304	14,075	13,441	14,258
Expanded Function Dental Auxiliary	212	240	286	359	389	483
Genetic Counselor	136	220	298	400	555	580
Hearing Aid Specialist	302	316	328	332	330	352
Home Care Aide	10,708	18,034	26,620	26,653	24,548	36,899
Humane Society	18	19	18	33	30	31
Hypnotherapist	788	749	744	697	718	669
Licensed Assistant Behavior Analyst	-	-	85	988	206	293
Licensed Behavior Analyst	-	-	733	154	1218	1366
Licensed Practical Nurse	11,944	11,768	11,558	11,189	11,464	10,494
Marriage & Family Therapist	1,486	1,603	1,824	2,033	2,355	2,838
Marriage & Family Therapist Associate	466	569	609	612	725	870
Massage Therapist	13,656	13,889	13,824	12,438	11,733	11,661
Medical Assistant[3]	31,291	35,612	38,688	40,486	43,028	43,199
Medical Program Director	-	-	-	-	-	34
Medical Program Director Delegate	-	-	-	-	-	1,631
Medication Assistant[4]	-	-	-	-	-	95
Medical Marijuana Consultant	-	-	-	583	473	685
Mental Health Counselor	6,059	6,803	7,646	8,501	10,106	11,765
Mental Health Counselor Associate	1,789	1,813	2,014	2,305	2,693	3,463

Profession or Facility	2013-15	2015-17	2017-19	2019-21	2021-23	2023-25
Midwife	161	175	182	199	219	223
Music Therapist[1]	-	-	-	-	-	62
Naturopathic Physician	1,231	1,398	1,474	1,571	1,620	1,659
Nursing Assistant	76,056	76,173	75,231	73,392	74,526	94,182
Nursing Home Administrator	441	441	439	403	401	401
Nursing Pool Operator	158	189	284	307	496	487
Nursing Technician	396	488	558	690	1342	1139
Occupational Therapist	3,271	3,565	3,909	4,022	4,362	4,657
Occupational Therapy Assistant	956	1,090	1,189	1,194	1,210	1,198
Ocularist	10	11	11	9	10	11
Optometrist	1,547	1,637	1,676	1,678	1,772	1,834
Orthotist/ Prosthetist	330	334	350	355	360	366
Osteopathic Physician	1,769	2,194	2,624	3,130	3,901	4,498
Osteopathic Physician Assistant[4]	59	88	128	126	0	0
Paramedic	2,568	2,662	2,760	3,095	3,018	3,241
Pharmacies and Other Pharmaceutical Firms	4,190	4,544	4,985	5,108	5,106	10,446
Pharmacist	9,627	10,232	10,716	11,046	11,274	11,733
Pharmacist Intern	1,394	1,579	1,777	1,588	1,345	1,157
Pharmacy Assistant	10,299	10,546	7,422	8,049	10,009	10,793
Pharmacy Technician	8,867	8,910	8,748	8,631	9,285	9,825
Physical Therapist	6,188	6,795	7,507	7,562	7,840	9,260
Physical Therapist Assistant	1,971	2,271	2,455	2,483	2,424	2,630
Physician	27,692	29,532	30,450	31,226	32,392	37,273
Physician Assistant	3,018	3,587	4,091	4,654	5,255	5,850
Podiatric Physician	353	377	377	380	393	421
Psychologist	2,796	2,996	3,254	3,995	3,824	4,100
Radiological Technologist	6,200	6,415	6,685	6,967	7,388	7,937
Radiologist Assistant	8	8	9	8	9	9
Recreational Therapist	146	144	168	162	139	143
Reflexologist	248	255	260	245	245	237
Registered Nurse	87,097	99,474	106,569	115,007	131,261	111,956
Respiratory Care Practitioner	2,794	2,915	3,028	3,186	3,661	3,527
Retired Volunteer Medical Worker	4	2	1	9	9	446
Sex Offender Treatment Provider	99	97	97	97	101	94
Sex Offender Treatment Provider Affiliate	30	26	27	23	12	13
Social Worker Advanced	119	139	154	155	151	138
Social Worker Associate Advanced	201	210	247	328	391	400
Social Worker Associate Independent Clinical	1,346	1,632	1,952	2,365	2,888	3,530
Social Worker Independent Clinical	3,858	4,173	4,712	5,373	6,670	8,907
Speech Language Pathologist	2,508	2,835	3,249	3,536	3,970	4,312
Speech Language Pathology Assistant	209	230	242	254	291	346
Substance Use Disorder Professional	2,878	2,919	3,026	3,045	3,102	3,263
Substance Use Disorder Professional Trainee	1,446	1,619	1804	1,588	1,432	1,485
Surgical Technologist	2,980	3,062	3,141	3,388	3,715	4,013
Veterinarian	3,586	3,843	4,076	4,273	4,525	4,792
Veterinary Medication Clerk	825	1,086	1,347	1,751	2,274	2,667

Profession or Facility	2013-15	2015-17	2017-19	2019-21	2021-23	2023-25
Veterinary Technician	2,027	2,183	2,302	2,434	2,623	2,786
X-Ray Technician	1,580	1,509	1,563	1,417	1,616	1,792
Total	**428,118**	**467,358**	**497,525**	**518,524**	**554,822**	**602,780**

[1] New credential
[2] Count includes new categories of certified and licensed agency affiliated counselor.
[3] Count includes MA-registered, MA-certified, MA-hemodialysis technician, MA-phlebotomist, and MA-forensic phlebotomist. It does not include the new category, MA-EMT, because the credential was implemented June 16, 2025 and none had been issued before the reporting period ended June 30, 2025.
[4] Beginning in the 21-23 biennium, all physician assistants are now under the Washington Medical Commission.

Appendix B: Updated Official List of Health Professions

1.	Acupuncture & Eastern Medicine Practitioner
2.	Advanced Emergency Medical Technician
3.	Advanced Registered Nurse Practitioner
4.	Animal Massage Practitioner
5.	Athletic Trainer
6.	Audiologist
7.	Behavioral Health Support Specialist
8.	Birth Doulas
9.	Cardiovascular Invasive Specialist
10.	Certified Behavior Technician
11.	Certified Peer Support Specialist
12.	Certified Peer Support Specialist Trainee
13.	Chiropractic X-Ray Technician
14.	Chiropractor
15.	Colon Hydrotherapist
16.	Co-occurring Disorder Specialist
17.	Counselor, Agency Affiliated-registered
18.	Counselor, Agency Affiliated-certified
19.	Counselor, Agency Affiliated-licensed
20.	Counselor, Certified
21.	Counselor, Certified Advisor
22.	Dental Anesthesia Assistant
23.	Dental Assistant
24.	Dental Hygienist
25.	Dentist
26.	Denturist
27.	Dietitian
28.	Nutritionist
29.	Dispensing Optician
30.	Dispensing Optician Apprentice
31.	Emergency Medical Responder
32.	Emergency Medical Technician
33.	Expanded Function Dental Auxiliary
34.	Genetic Counselor
35.	Hearing Aid Specialist
36.	Home Care Aide
37.	Hypnotherapist
38.	Licensed Assistant Behavior Analyst
39.	Licensed Behavior Analyst
40.	Licensed Practical Nurse
41.	Marriage & Family Therapist
42.	Marriage & Family Therapist Associate
43.	Massage Therapist
44.	Medical Assistant-registered

45.	Medical Assistant-certified
46.	Medical Assistant-hemodialysis technician
47.	Medical Assistant-phlebotomist
48.	Medical Assistant-forensic phlebotomist
49.	Medical Assistant-EMT
50.	Medication assistant
51.	Medical Program Director
52.	Medical Program Director Delegate
53.	Mental Health Counselor
54.	Mental Health Counselor Associate
55.	Midwife
56.	Music Therapist
57.	Naturopathic Physician
58.	Nursing Assistant-registered
59.	Nursing Assistant-certified
60.	Nursing Home Administrator
61.	Nursing Pool Operator
62.	Nursing Technician
63.	Occupational Therapist
64.	Occupational Therapy Assistant
65.	Ocularist
66.	Optometrist
67.	Orthotist
68.	Prosthetist
69.	Osteopathic Physician
70.	Paramedic
71.	Pharmacist
72.	Pharmacy Assistant
73.	Pharmacy Technician
74.	Physical Therapist
75.	Physical Therapist Assistant
76.	Physician
77.	Physician Assistant
78.	Podiatric Physician
79.	Psychologist
80.	Radiological Technologist
81.	Radiologist Assistant
82.	Recreational Therapist
83.	Registered Nurse
84.	Reflexologist
85.	Respiratory Care Practitioner
86.	Retired Volunteer Medical Worker
87.	Sex Offender Treatment Provider
88.	Sex Offender Treatment Provider Affiliate
89.	Social Worker Advanced

90.	Social Worker Associate Advanced
91.	Social Worker Associate Independent Clinical
92.	Social Worker Independent Clinical
93.	Speech Language Pathologist
94.	Speech Language Pathology Assistant
95.	Substance Use Disorder Professional
96.	Substance Use Disorder Professional Trainee
97.	Surgical Technologist
98.	Veterinarian
99.	Veterinary Medication Clerk
100.	Veterinary Technician
101.	X-Ray Technician

Board and Commission Supplemental Reports

RCW 18.130.310(2) allows health profession boards and commissions to prepare a biennial report to complement the UDA report completed by the department. These reports may provide additional information about disciplinary activities, rulemaking and policy activities, and receipts and expenditures.

In Washington, there are two commissions and one board with regulatory authority independent of the Secretary of Health including the Washington Medical Commission, the Washington Board of Nursing, and the Chiropractic Quality Assurance Commission. These independent regulatory entities, called partner commissions, prepared the following reports.

Reviewing the Disciplinary Graphs

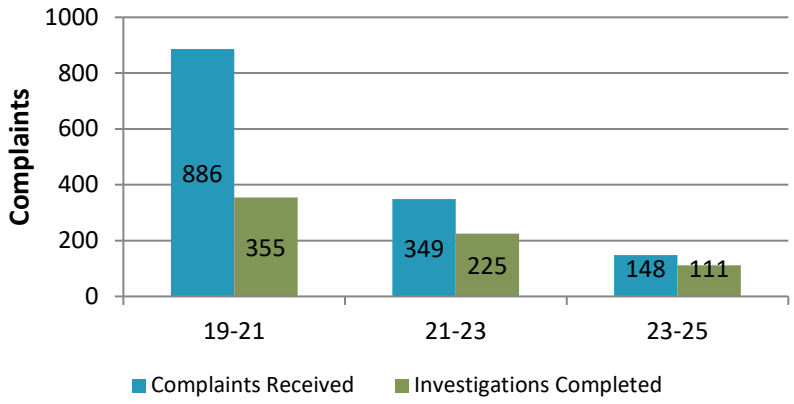
The report for each partner commission includes two graphs:

1) The first summarizes the number of complaints received and investigations completed over the last four biennia.

2) The second depicts the types of disciplinary case outcomes for each board or commission over the past four biennia.

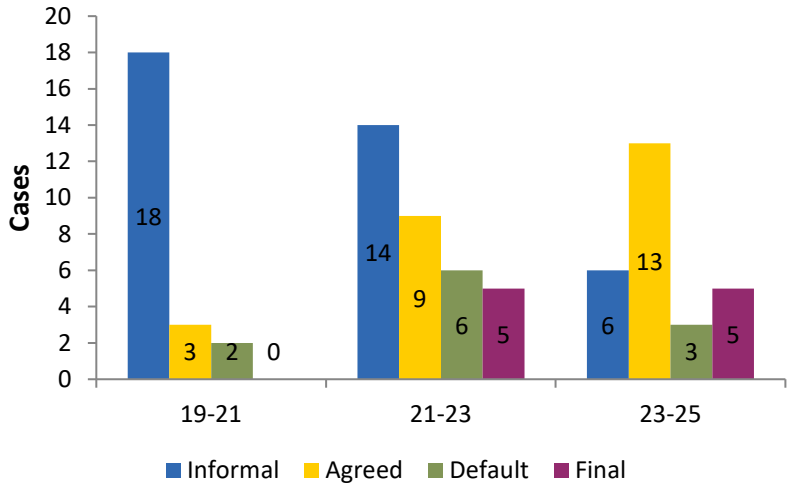
Chiropractic Quality Assurance Commission

The Chiropractic Quality Assurance Commission (CQAC) protects the public by credentialing and disciplining chiropractors and chiropractic x-ray technicians. The commission regulates the professions by developing rules, policies, and guidelines. CQAC is made up of 14 commission members (11 chiropractors and 3 public members) appointed by the governor. Chiropractic members must be licensed to practice in Washington for five years prior to appointment.



Complaints in FY 23-25 are trending downwards. CQAC experienced a significant decrease in COVID-related cases since the end of the pandemic. In this biennium, CQAC received and presented 148 complaints for assessment, 111 investigations during this period.

CQAC doesn't include sexual misconduct or unlicensed practice cases in these counts since those are referred to the secretary of health for investigation and action.



During this biennium, CQAC issued 6 Stipulation to Informal Dispositions (STIDs), which do not require admission of wrongdoing by the licensee. Ninety-nine percent of the orders issued (formal discipline) complied with the sanction schedule guidelines, which makes for clearer and more consistent regulatory outcomes.

Cases closed informally do not include remediation plans, NOCs or cease and desist orders.

Rulemaking and Policy Activity

Rulemaking Activity

Rulemaking Activity in Process

- Classification of Chiropractic Procedures and Instrumentation
- Chiropractic Credentialing Requirements

Rulemaking Activity Completed

- Chiropractic health equity continuing education.
- Chiropractic X-ray technician course requirements, continuing education (including health equity), and expired status.
- The Department of Health (department) in collaboration with the Chiropractic Quality Assurance Commission (commission) adopted amendments to WAC 246-808-990 to update chiropractic and x-ray technician licensure, registration, renewal, and other fees including clarifying language.

Policies

- Telehealth Policy
- Licensure by Endorsement – Substantially Equivalent Qualifications
- Chiropractic License Applicants or Inactive License Holders
- Initial and Re-Approval of Chiropractic X-Ray Technician Courses

Legislation

2SHB 1009 (2023) Miliary Spouses -Professional Licensing and Employment: This bill reduces barriers to licensure for military spouses by requiring a temporary license to practice be issued in Washington within 30 days of receiving a completed application and allows the license to be in place for up to 180 days. The bill also requires each disciplining authority to provide training to board or commission members on topics related to military spouses, review licensing fees for possible ways to reduce costs for military spouses and create a webpage with specific military assistance information.

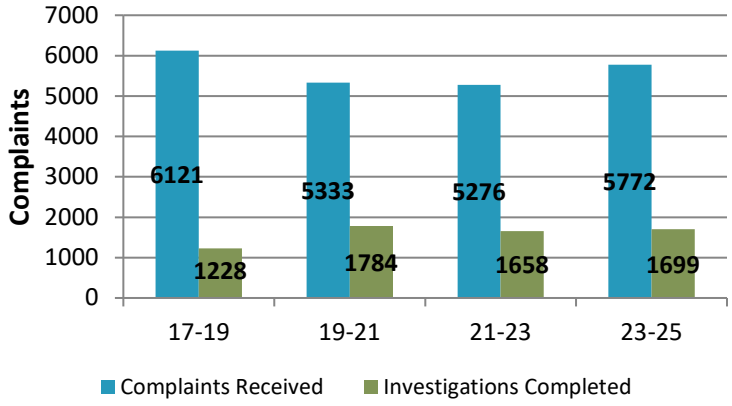
ESHB 1503 (2023) Collecting health care professionals' information at the time of license application and license renewal: This bill requires the Department of Health to collect demographic data from health care providers upon license application or renewal. This data will help the department better understand the health care workforce and address health care equity issues.

2SHB 1724 (2023) Increasing the trained behavioral health workforce: This bill requires a disciplining authority to waive education, training, experience, and exam requirements for applicants who have been credentialed in another state or states with substantially equivalent standards for at least two years immediately preceding their application with no interruption in licensure lasting longer than 90 days. A disciplining authority may also waive education,

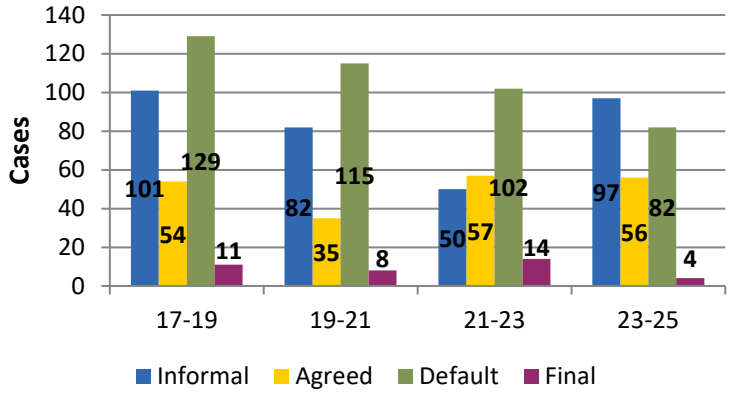
training, experience, or exam requirements for applicants who have achieved a national certification for the profession as determined by the disciplining authority in rule.

Washington State Board of Nursing

The Washington State Board of Nursing (WABON) protects the public's health and safety by regulating the competency and quality of licensed practical nurses, registered nurses, advanced registered nurse practitioners, and nursing technicians. The purpose of WABON includes establishing, monitoring, and enforcing licensing regulations, consistent standards of practice, continuing competency mechanisms, and discipline. The governor appoints 15 board members to four-year terms: three licensed practical nurses, seven registered nurses, two advanced registered nurse practitioners, and three public members. These members represent nursing education, long term care, nurse administrators, staff nurses, and consumers of health care.



Complaints in the 23-25 biennium are trending up. This is due, in part, to continued cases associated with the FBI's Operation Nightingale, which involves nurses who purchased substandard education from fraudulent schools located primarily in Florida. The increase in cases completed is partly attributed to standardizing the investigative strategy of the Operation Nightingale cases by using a portfolio-style report that contains all necessary school data and a specialized section on each individual nurse associated with the respective school.



In the 23-25 biennium, fewer cases were attached to disciplinary action, as many cases related to Operation Nightingale were settled with administrative action. Hearings Examiners also devoted time to supporting all units within WABON, implementing the Nurse Licensure Compact, and HELMS.

Washington Health Professional Services

Washington Health Professional Services (WHPS) is a non-public program for nurses whose practice may be affected by substance use. Participation allows nurses to protect their licenses while receiving the help needed to recover from substance use disorder. WHPS protects the public by providing early intervention, referral to treatment, and structured monitoring services. Nurse monitoring has positive outcomes with success rates upwards of 70%. Most nurses in monitoring achieve long-term recovery and continue to practice in their profession.

For the 2023-2025 Biennium, the details for WHPS are below:

WHPS Participant License Categories	Nurses Participating in the WHPS Program due to Discipline or Action Against Their License	Nurses Voluntarily Participating in the WHPS Program	Nurses Achieving Successful Program Completion	Total WHPS Enrollment During the Biennium
Registered Nurse (RN)	269	38	81	307
Licensed Practical Nurse (LPN)	33	2	4	35
Advanced Registered Nurse Practitioner (ARNP)	10	3	3	13
Certified Registered Nurse Anesthetist (CRNA)	6	5	5	11
Nurse Technician (NT)	0	0	0	0

Nursing Education

WABON approves and reviews all nursing education programs in the state of Washington and out-of-state distance learning programs that have clinical practice experiences within Washington. This includes nursing assistant training programs, alternative nursing assistant training programs, refresher courses, professional vocational relationship courses, undergraduate and graduate nursing education programs.

The total number of nursing education programs is 1,226 and includes:

In State Programs/Tracks
8 LPN
10 LPN-ADN
25 ADN Programs
13 BSN Programs
17 RN-BSN
125 Post-BSN Programs
8 Refresher Programs (2 LPN, 6 RN)
5 LPN-BSN
6 PVR
10 LPN-ADN

Out-of-State Programs/Tracks
1 LPN
4 ADN
2 LPN-BSN
13 NTECH
7 BSN
30 RN-BSN
348 MSN
228 DNP
80 Post Graduate Certificates
88 Post Masters Certificates
2 PhD Programs

Nursing Assistant Programs
157 Traditional Nursing Assistant (NA) programs
25 Home Care Aide to NA Programs (HCA)
9 Medical Assistant to NA Programs (MA)
5 Medical Assistant-Certified Training Programs (MACE)

Rulemaking and Policy Activity

The legislature passed several bills during the 2024 and 2025 legislative sessions that directly impacted the nursing profession. Among the most significant are SHB 2416 (chapter 239, Laws of 2024) and SB 5051 (chapter 5, Laws of 2025).

- HB 2416 changed the legal title of Advanced Registered Nurse Practitioners (ARNPs) to Advanced Practice Registered Nurses (APRNs) in Washington, aligning the title with national standards and improving consistency across state and federal documentation.
- SB 5051 consolidated regulatory authority for nursing assistants under WABON, streamlined oversight, and aligned the regulation of all nursing professions under a single agency.

WABON, in collaboration with DOH, has begun developing a comprehensive transition plan to support the full implementation of SB 5051 by its effective date of July 1, 2026. Planning efforts have included coordination across multiple operational areas to ensure a smooth and timely transition. Key components of the transition plan include: revising and aligning WAC chapters with new statutory authority; addressing collective bargaining considerations for affected staff; transferring staff and roles from DOH to WABON; reallocating budget allotments to support expanded responsibilities; refining credentialing and disciplinary processes to fit WABON's existing framework; identifying and providing necessary staff training; and developing guidance and support resources. This collaborative planning process is ongoing and is designed to ensure that WABON is fully prepared to assume responsibility for nursing assistant regulation while minimizing disruptions to credentialing, enforcement, and workforce support.

In 2024, WABON fully implemented the Nurse Licensure Compact (NLC), following the passage of SSB 5499 (Chapter 123, Laws of 2023). WABON launched Phase 1 of NLC implementation within three months of the bill's signing, allowing nurses with multistate licenses from other compact states to practice in Washington. Phase 2, which involved issuing multistate licenses to qualified Washington residents, was completed in January 2024. The timeline includes necessary updates to the state's licensing system and the completion of the rulemaking process.

Legislation

Following are the 2023-2025 bills with implications for WABON.

Profession	WAC Sections	Purpose	Status
Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, Nurse Technicians Legislation **HB 1009** Effective 7/23/2023	Amendments to: WAC 264-840-095	1009-S2.SL.pdf (wa.gov) **Military spouses—professional licensing and employment**	Completed CR-103P WSR: 24-03-055 Filed: 1/11/2024
Registered Nurses, Advanced Registered Nurse Practitioners, Nursing Assistants Legislation	Amendments to: WAC 246-840-010 WAC 246-840-700 WAC 246-840-910 WAC 246-840-920 WAC 246-840-930 WAC 246-840-940 WAC 246-840-950	1124-S.PL.pdf (wa.gov) **Nurse delegation of glucose monitoring, glucose testing, and insulin injections**	Completed CR-103P WSR: 24-13-079 Filed: 6/17/2024

SHB 1124 Effective 7/1/2022	WAC 246-840-960 WAC 246-840-970		
Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, Nurse Technicians Legislation **SHB 1255** Effective 7/23/2023	Amendments to: WAC 246-840-750 through WAC 246-840-780 New Section: WAC 246-840-790	1255-S.SL.pdf (wa.gov) **Reducing stigma and incentivizing health care professionals to participate in a substance use disorder monitoring and treatment program**	Completed CR-103P WSR: 24-12-066 Filed: 6/3/2024
Advanced Registered Nurse Practitioners Legislation **HB 2416** Effective 6/30/2027	Amendments to: Chapter 246-840 WAC and other relevant sections of Title 246 WAC.	2416-H.SL.pdf (wa.gov) **Changing the legal title for advanced practice nurses**	Pre-filing notice of the CR-105 will begin in 2026 to align with the effective date of the legislation.
Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, Nurse Technicians Legislation **ESSB 5229** Effective 7/25/2021	Amendments to: WAC 246-840-220 And other relevant continuing education rule sections in Chapter 246-840 WAC	5229-S.SL.pdf (wa.gov) **Health equity & continuing competency**	Completed CR-103P WSR: 23-23-166 Filed: 11/21/2023
Nursing Assistants Legislation **SB 5051** Effective 7/1/2026	Amendments to: Chapter 246-841A WAC	5051-S.SL.pdf (wa.gov) **Consolidating regulatory authority for nursing assistants**	CR-101 WSR: 25-05-087 Filed: 2/18/2025 The board is in the process of developing rule language. Proposed rule language will be

			considered by the board during its January 9, 2026 Business Meeting.
Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, Nurse Technicians	Amendments to: WAC 246-840-990	5499-S.SL.pdf (wa.gov) **Concerning the multistate nurse licensure compact**	Completed CR-103P WSR: 24-02-057 Filed: 12/28/2023
Legislation **SSB 5499** Effective 7/23/2023			
Registered Nurses, Licensed Practical Nurses, Advanced Registered Nurse Practitioners, Nurse Technicians Legislation **E2SSB 5582** Effective 7/23/2023	Amendments to: WAC 246-840-517 WAC 246-840-534 And other relevant rule sections in Chapter 246-840 WAC	5582-S2.SL.pdf (wa.gov) **Reducing barriers and expanding educational opportunities to increase the supply of nurses in Washington**	Completed CR-103P WSR: 25-17-091 Filed: 8/20/2025

Rules (Completed)

Profession/Title	WAC Sections	Purpose	Status
Nursing Assistants and NAC Training Program Standards	Repealed Chapter 246-841 WAC Chapter 246-842 WAC Established: Chapter 246-841A WAC	Created new Chapter 246-841A WAC; and repealed chapters 246-841 and 246-842 WAC. The new chapter represents a collaboration between the board and the department of health to address necessary changes in the nursing assistant	CR-103P WSR: 23-20-117 Filed: 10/3/2023

	Chapter 246-842 WAC (repealed)	rules. The board and department identified that chapter 246-841 WAC needed updating to reflect best practices, and chapters 246-841 and 246-842 WAC needed to be repealed to eliminate redundancy.	
Nursing Temporary Practice Permits	Amendments to: WAC 264-840-095	The board adopted amendments to WAC 264-840-095 to reduce the duration of a temporary practice permit from 180 days to 60 days, aligning the rule with the board's current practice and encouraging timely completion of the licensure process. The amendments also shortened the extension period for the temporary practice permit from 180 days to 30 days.	CR-103P WSR: 24-03-055 Filed: 1/11/2024
Blood Glucose Delegation	Amendments to: WAC 246-840-010 WAC 246-840-700 WAC 246-840-910 WAC 246-840-920 WAC 246-840-930 WAC 246-840-940 WAC 246-840-950 WAC 246-840-960 WAC 246-840-970	The board permanently adopted amendments to revise the required amount of time for RN supervision and evaluation of delegated insulin injection tasks. In response to Substitute House Bill (SHB) 1124 (Chapter 14, Laws of 2022),	CR-103P WSR: 24-13-079 Filed: 6/17/2024

		the board also established new rule sections regarding nurse delegation of blood glucose monitoring and testing.	
Health Equity Continuing Education	Amendments to: WAC 246-840-220 New Section: WAC 246-840-222	5229-S.SL.pdf (wa.gov) In compliance with RCW 43.70.613, the board adopted permanent rules requiring licensees to complete two hours of health equity education annually, as part of their existing CE requirements. This exceeds the minimum requirement in the model rules, which mandate two hours every four years. No additional topics beyond those outlined in the model rules are being added.	CR-103P WSR: 23-23-166 Filed: 11/21/2023
Initial Out-of-State Exam and Endorsement Licensing For Registered Nurses & Licensed Practical Nurses	Amendments to: WAC 246-840-030 WAC 246-840-090	The board adopted emergency rule language into permanent rule, amending specific provisions to clarify licensure requirements for RN and LPN applicants seeking initial licensure through an out-of-state traditional nursing education program	CR-103P WSR: 24-10-063 Filed: 4/26/2024

		approved by another U.S. nursing board, as well as for applicants applying through interstate endorsement.	
Multistate License Fee	Amendments to: WAC 246-840-990	5499-S.SL.pdf (wa.gov) The Department of Health, in consultation with the board, adopted amendments to WAC 246-840-990 to establish a new multistate nursing license fee and to increase the nursing center surcharge fee, as directed by SSB 5499 (Chapter 123, Laws of 2023).	CR-103P WSR: 24-02-057 Filed: 12/28/2023
Nursing Administrator Requirements	Amendments to: WAC 246-840-517	The board permanently adopted amendments to the education and experience requirements for nurse administrators of baccalaureate nursing education programs in WAC 246-840-517. These changes were made in response to E2SSB 5582 (Chapter 126, Laws of 2023).	CR-103P WSR: 25-17-091 Filed: 8/20/2025
Substance Use Disorder Monitoring Program Participation	Amendments to: WAC 246-840-750 through WAC 246-840-780 New Section:	1255-S.SL.pdf (wa.gov)	CR-103P WSR: 24-12-066 Filed: 6/3/2024

	WAC 246-840-790	The board established new definitions and terminology changes related to its SUD monitoring program in response to SHB 1255 (Chapter 141, Laws of 2023). The board also created a new rule section establishing application requirements for a stipend program to offset treatment costs. The new rule mirrors the statutory eligibility requirements, further defines the board's process for covering out-of-pocket expenses through the stipend program, and clarifies the approved SUD program as established in existing rules.	

Rules (In Progress)

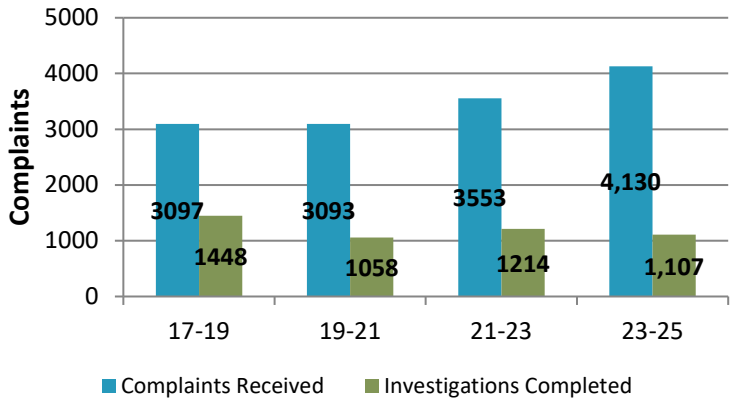
Profession/Title	WAC Sections	Purpose	Status
Integration of Skills Testing into Nursing Assistant Training Programs and Updates to Specialty Curricula Requirements	Amendments to: Chapter 246-841A WAC	The board is considering amendments to nursing assistant rules to implement skills testing within training programs, revise requirements for specialty curricula, and make other related	CR-101 WSR: 25-05-087 Filed: 2/18/2025 The board is in the process of developing rule language. Proposed rule language will be

		changes as appropriate. The board is also considering additional updates to this chapter to implement SB 5051 (Chapter 5, Laws of 2025).	considered by the board during its January 9, 2026 Business Meeting.
Registered Nurse and Licensed Practical Nurse Licensing and Continuing Competency	Amendments to: WAC 246-840-015 WAC 246-840-020 WAC 246-840-025 WAC 246-840-030 WAC 246-840-045 WAC 246-840-048 WAC 246-840-050 WAC 246-840-060 WAC 246-840-090 WAC 246-840-095 WAC 246-840-105 WAC 246-840-111 WAC 246-840-120 WAC 246-840-125 WAC 246-840-200 WAC 246-840-210 WAC 246-840-220 WAC 246-840-222 WAC 246-840-230 WAC 246-840-250 WAC 246-840-260	The board is considering amendments to WAC 246-840-015 through 246-840-260 to modernize outdated language, reorganize and reformat rules to align with current best practices, and restructure sections as needed. Additional topics under consideration include reducing barriers and simplifying regulations for multistate licensure applicants and internationally educated applicants, and exploring limits on NCLEX attempts before requiring remediation. This rulemaking is Phase 1 of the board's formal review of chapter 246-840 WAC, conducted as part of its five-year rule review under RCW 43.70.041.	CR-101 WSR: 24-24-011 Filed: 11/21/2024 Proposed rule language was approved by the board during its May 9, 2025 Business Meeting. The CR-102 rule hearing is scheduled for the November 7, 2025 Business Meeting.

Advanced Practice and Pain Management	Amendments to: WAC 246-840-010 WAC 246-840-300 through WAC 246-840-4990	The 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 related objectives. This rulemaking is Phase 2 of the board's formal review of chapter 246-840 WAC, conducted as part of its five-year rule review under RCW 43.70.041. The goal is to update outdated language, reorganize and reformat rules, and ensure consistency with current best practices.	CR-101 WSR: 25-15-033 Filed: 7/8/2025 The board is in the process of developing rule language. Proposed rule language will be considered by the board during its March 13, 2026 Business Meeting.

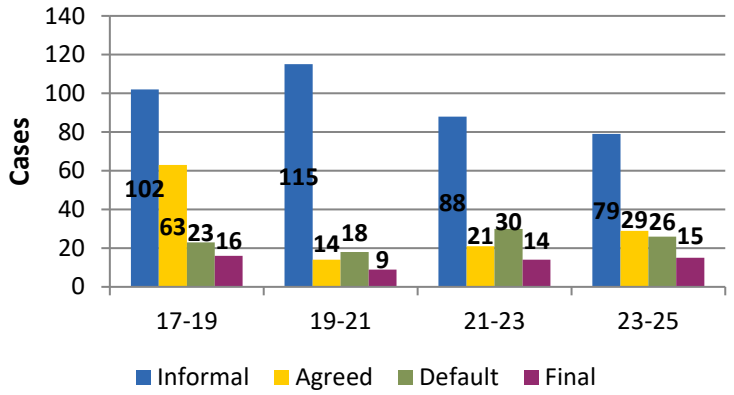
Washington Medical Commission

The Washington Medical Commission (WMC) promotes patient safety and enhances the integrity of the profession through licensing, discipline, rulemaking, and education. The governor appoints 21 commission members to four-year terms: 13 physicians, 2 physician assistants, and 6 public members to pursue work furthering the governor's goal of healthy and safe communities. Complaints come from a variety of sources. These sources include: the public, mandatory medical malpractice reports from insurance companies, and adverse action reports from medical societies, hospitals, medical service bureaus, professional standards review organizations, federal, state, and local agencies.



In this biennium, the WMC received and presented 4,130 complaints for assessment, which is 16.2 percent higher than the prior biennium. Twenty-nine percent of the complaints presented were authorized for investigation. The WMC completed 1,107 investigations during this period.

WMC doesn't include sexual misconduct or unlicensed practice cases in these counts since those are referred to the secretary of health for investigation.[7]



During this biennium, the WMC issued 79 Stipulation to Informal Dispositions (STIDs), which do not require admission of wrongdoing by the licensee. Ninety-nine point five percent of the orders issued (formal discipline) complied with the sanction schedule guidelines, which makes for clearer and more consistent regulatory outcomes.

[7] Additional discrepancies in case and investigation counts compared to UDA tables were present due to slight differences in data collection methodology.

Rulemaking Activity Completed

- SB 5229 - Health Equity CE
- Emergency rulemaking - WAC 246-919-330 – Post Graduate Training requirements
- WAC 246-919-330 Postgraduate Medical Training – finalizing emergency rulemaking (file permanent rules)
- HB 1009 Military Spouse amendments to comply with updated law
- SB 5184 - Anesthesia Assistants - New Profession
- HB 2041 – PA Collaborative Practice amendments to comply with updated law
- Technical edits to WAC 246-919-945 and WAC 246-918-895 – removing references to Osteopathic physician assistants as that license type was eliminated and all physician assistants are now under the authority of the WMC.

Washington State Department of
HEALTH