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June 20, 2011

Medical Quality Assurance Commission Members
Leslie M. Burger, MD, Chair, Medical Quality Assurance Commission (MQAC)
243 Israel Road S.W.
Tumwater, WA 98501

**Re: Supplement to WSMA/WAFP Formal Request for Amendment of
MQAC Rules on Chronic Non-cancer Pain**

Dear Dr. Burger & MQAC Members:

The purpose of this letter is to supplement the formal petition filed with MQAC on June 1, 2011 from the Washington State Medical Association (WSMA) and the Washington Academy of Family Physicians (WAFP) to the Medical Quality Assurance Commission (Commission), and the clarification letter submitted on June 7, 2011, regarding the Commission's recently adopted pain management rules.

The WSMA and WAFP believe that for matters of consistency and best practices any changes made to the physician WACs 246-919-850 through 863 should also be made to the physician assistant WACs 246-919-800 through 811. This letter is our formal petition requesting that the physician assistant WACs be amended in a similar manner as jointly requested by the WSMA and WAFP with regard to physician WACs 246-919-850 through 863.

As our two organizations have communicated to the Commission on several occasions, left unaltered the rules are overly prescriptive, and will therefore very likely decrease access to care for a very demanding and challenging patient population.

We look forward to an early and favorable response to this petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Layton". The signature is fluid and cursive, with the first name "Tim" written in a larger, more prominent script than the last name "Layton".

Tim Layton
Senior Director
Legislative, Regulatory and Legal Affairs
Washington State Medical Association

cc: Medical Quality Assurance Commission Members
Maryella Jansen, Executive Director, MQAC
WSMA and WAFP Executive Committee Members
Tom Curry, WSMA Executive Director/CEO
Karla Graue Pratt, Executive Vice President, WAFP
Michael Transue, WAFP State Legislative Liaison