

October 27, 2025

Attention Hospital and Insurance Credentialing organizations:

As the regulatory authority for all Washington State licensed allopathic Physicians, Physician Assistants, and Anesthesiologist Assistants, we would like to take this opportunity to provide an update on statutory and legal changes recently enacted by the Legislature and implemented by the Washington Medical Commission (WMC).

The 2025 Washington State Legislature passed Senate Bill 5118, which provides updates to the MD Clinical Experience license (MD CE) housed within 18.71 RCW, the physician Medical Practice Act of Washington State. This bill:

- Was the first ever signed by Governor Ferguson;
- Became effective July 27, 2025;
- Includes key updates such as:
 - Extending the timeframe of validity for the license;
 - Clarifies what organizations may request these licenses to include physician employment groups.

Notably and for the purposes of this letter, a the Legislature amended the law to:

- Help remove the guesswork and various interpretations by entities not charged with the interpretation of Washington State law;
- Clarify that the MD CE is a valid and recognized physician license;
- Define that it must be viewed as a full and unrestricted physician license issued to a duly qualified Medical Doctor.

This is the determination of the Legislature and the official interpretation of the Commission, which is the regulatory authority for medical licensure and practice in Washington State. The relevant statute specifying and supporting this interpretation comes from 18.71.095 (5)(g):

*"For purposes of medical practice, employment role definition, malpractice coverage, credentialing, and insurance billing for plans described in, but not limited to, Title 48 RCW, the licensee **shall** be considered a full scope physician..."*

As you can see by the word 'shall', the categorization and scope of the MDCE licensee is non-discretionary. We hope this statutory clarification will help answer the question of qualifications and license status for the MDCE practitioner, which will allow your organization to appropriately credential these licensees in accordance with the law: as full scope physicians.

Thank you for taking the time to incorporate this guidance and non-discretionary statutory updates into your credentialing and onboarding processes. Should you have further questions, please reach out to the WMC: medical.licensing@wmc.wa.gov.

Regards,

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