



August 16, 2021

The Honorable Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504

Re: Proclamation 21-14, COVID-19 vaccination mandate
Delivered via email

Dear Governor Inslee,

I am writing on behalf of the Washington State Chiropractic Association Board of Directors with respect to Proclamation 21-14 regarding mandatory COVID-19 vaccination requirements for health care workers in the State of Washington.

The WSCA Board shares the concerns of all Washingtonians with respect to the implications of COVID-19 infection now and into the future. However, we hold a different view of the best strategy to accomplish maximum compliance in addressing the pandemic balanced with critically important matters of self-governance and freedom from mandatory prophylaxis or treatment.

The Board is puzzled by the exclusions provided under certain definitions in the proclamation, and we are seeking to know the logic behind the decision, for example, to exempt independent home health care providers from mandatory COVID-19 vaccination as an element of continued professional practice in the State of Washington.

The environment of the home health care provider seems like it would be one of greater risk and viral load exposure, in comparison to a chiropractic office visit, based on time encounter alone, yet those workers are excluded from this proclamation. Assuming standard personal protective equipment (PPE) provisions are employed, and personal sanitation measures are also employed, the exposure in a chiropractic setting would be negligible in comparison. We respectfully question why one group is provided an exemption and others are not.

It is unfortunate that representatives of the WSCA were not included in any stakeholder discussion in advance of such a consequential and professionally and personally impactful proclamation. As recently as June 1, 2021, our Executive of Legislation and Policy, Lori Grassi, spoke with your staff about vaccine mandates/passports and her personal circumstance. As part of that discussion, it was relayed that there was no consideration at that time to invoke such a requirement. I am sure you can appreciate the sharp contrast between that June 2021 discussion reflecting no mandates for COVID-19 vaccination and the August 2021 proclamation's proposed loss of professional status, ability to practice and loss of economic stability due to COVID-19 vaccination status, especially without stakeholder discussions.

It is no secret that the subject of COVID-19 vaccination is a hotly debated issue across the American landscape. Washington, in comparison to other states, is unique in its high level of COVID-19 vaccination

compliance. This reality is also reflected within the chiropractic community in Washington with those who enthusiastically engage COVID-19 vaccination and those who are expressing concerns about safety and efficacy of the same, especially in the absence of longitudinal clinical data. It seems rather severe that this proclamation proposes to end the careers of an unknown number of health care providers across a range of disciplines based on a procedure for which the citizenry at large have formed no consensus about. Other nearby states have allowed providers to “test out” at regular intervals to prove they are not infected (Oregon) or have a complete exemption (California).

Following a year of Washingtonians limiting their health care visits and relying more heavily on prescription drugs to manage pain, the opioid epidemic has only increased. In a recent Issue Brief¹ available on the American Medical Association (AMA) website, updated August 4, 2021, it states that “the nation’s COVID pandemic made the nation’s drug overdose epidemic worse.” The brief continues to report that every state has reported a spike or increase in overdose deaths or other problems during the COVID pandemic. In addition, this site provides a state-by-state reference to specific examples of reports relating to the sharp increase of drug overdose deaths with fentanyl availability as a main factor. This proclamation will likely have unintended consequences which could limit the availability of a consumer to seek an alternative to prescription, or illegal, drugs to manage their pain.

Like all healthcare fields, chiropractic is experiencing ongoing personnel shortages, both among practitioners and support staff. It is increasingly difficult for our members to meet the demand for care and any action by the state that may further limit our individual members’ ability to deliver their services will only exacerbate the problem. If this proclamation were to limit our ability to maintain current staff, or restrict the already limited hiring pool, then options for care dwindle. Washingtonians will continue the trend seen nationwide throughout the pandemic of dangerously relying on opioids rather than safe and effective drugless care.

Other organizations have formal labor union negotiations available to them, whereas the chiropractors of Washington State only have the representation of the WSCA. The WSCA Board is, and has been, actively working toward compliance of our members and continue to promote patient safety. The Board urgently and respectfully requests an opportunity for discussion about the nuanced details reflected in Proclamation 21-14 and the achievement of greater patient protection and safety in health care settings across disciplines in the State of Washington. The current policy taking effect on October 18, 2021, will have a detrimental impact on our small clinics and staff.

On behalf of the WSCA Board, I look forward to hearing from you at your earliest convenience through our Executive of Legislation and Policy, Lori Grassi.

Respectfully,



Brian Petersen, DC
WSCA President

cc: Dr. Umair Shah, Secretary of Health
Molly Voris, Sr. Policy Advisor for Public Health & Health Care

¹ <https://www.ama-assn.org/system/files/issue-brief-increases-in-opioid-related-overdose.pdf>