

Jan 27, 2025

Dear Governor Kotek and Director Clarke,

I am writing on behalf of the Coalition of Oregon Professional Associations for Counseling and Therapy (COPACT), an organization that works on behalf of all licensed professional counselors, licensed marriage and family therapists, registered associates and students in counseling and marriage and family therapy programs. We are a partner of the Oregon Counseling Association (ORCA). Our mission is to advance access to quality mental health care for all Oregonians. I am writing to you to express our disappointment with the way important stakeholders have been left out of the process regarding board registered associates and mental health interns' ability to bill the Oregon Health Plan (OHP). On January 16, 2025 the Oregon Health Authority (OHA) released a memorandum outlining the rulemaking processing for this issue. This memo was only shared with Association of Oregon Community Health Programs (AOCMHP), CCO Behavioral Health Directors, Community Mental Health Programs (CMHPs), Oregon Council for Behavioral Health (OCBH), and Tribal Mental Health Programs. The decision to leave out known coalitions of mental health providers such as COPACT and ORCA exemplifies an overwhelming lack of community and stakeholder involvement regarding this issue.

The proposed change would restrict Board Registered Associates and Mental Health Interns from billing OHP outside of certified or licensed organizations. We share OHA's goal of ensuring quality care for all OHP recipients, and this policy would have significant negative impacts for OHP patients who are currently being served by associates/interns. This decision would jeopardize access to mental health care, workforce stability, and equitable training opportunities in Oregon.

Impact on Patient Care

Thousands of OHP patients stand to lose access to their therapists if this policy is enacted, further exacerbating Oregon's mental health crisis. Community mental health clinics cannot absorb the additional demand and are generally intended for high acuity patients, leaving OHP members that do not fit that demographic stuck on a long waitlist or unable to access a provider. The decision would ensure longer wait times and fewer choices for care. This undermines ongoing state efforts to improve access to behavioral health services.

Workforce Stability

Associate therapists play a critical role in Oregon's behavioral health workforce and are the most racially and ethnically diverse segment, reflecting the state's commitment to equitable care. Limiting their employment options will discourage new professionals from entering the field and will cause many to leave, thus hindering workforce diversity and stability at a time when these

qualities are desperately needed. We understand the importance of community mental health programs, but this is not the way to address their workforce crisis.

Pipeline to Licensure

Flexibility during the supervision process has been essential to growing Oregon's licensed behavioral health workforce. From 2018 to 2022, the number of counselors and therapists working full-time increased by over 13% annually, largely due to policies enabling associate therapists to practice in diverse settings.¹ Restricting their employment options risks reversing this progress and leaving the state ill-equipped to meet growing demand.

Addressing Workforce Shortages

Over 60% of healthcare providers in Oregon report a need for more behavioral health professionals, and 76% emphasize the importance of expanding training capacity.² Restricting private practice opportunities for associate therapists directly contradicts these goals and threatens to deepen the state's behavioral health workforce crisis.

Equity in Training

Fully licensed providers of color have cited leaving community mental health due to a lack of cultural competence and unsafe working conditions. Limiting opportunities for associate therapists will perpetuate barriers to increasing diversity in the behavioral health field, undermining efforts to make care more accessible and culturally responsive.

We urge the OHA to reconsider this proposed rule change and to engage with stakeholders, including associate therapists and private providers, to explore alternative solutions that balances the needs of community mental health and that stabilizes the workforce generally, with the need for an accessible, diverse, and stable behavioral health workforce. We are eager to collaborate in finding a path forward that addresses these challenges without compromising care for vulnerable Oregonians.

Thank you for your attention to this critical matter. We respectfully request a meeting to discuss these concerns further.

Sincerely,

Elisabeth Herrera LPC, NCC

COPACT President

¹ [Oregon's Health Care Workforce Needs Assessment 2023](#) (page 79)

² [Oregon's Health Care Workforce Needs Assessment 2023](#) (page 78)