



February 11, 2025

RE: HB 2041

House Behavioral Health and Healthcare Committee
Oregon Legislature

Chair Nosse, Vice Chairs Javadi and Nelson, and members of the committee:

My name is Dan Thoma. I am a licensed professional counselor and the Director of Behavioral Health for Moda Health. Thank you for the opportunity to testify.

HB 2041 and the -1 amendment would require health plans including OEGB to reimburse licensed professional counselors and other mental health professionals at the same rate that we pay to licensed physicians. Although this bill could be a windfall to me personally as an LPC, I believe it would be bad policy for our state and would be fundamentally inequitable.

The work of mental health parity is never done, but Oregon has made tremendous progress. HB 3046 in 2021 established rigorous standards for analysis, reporting, and comparability of reimbursement. And it was effective. In response to both market demand and the legal requirements of HB 3046, Moda Health has substantially increased our standard reimbursement for mental health therapists. In 2021, our standard rate for a one hour visit with an LPC or LCSW was \$93. Today our standard rate for that same visit is \$169.72. This is within pennies of the average for our industry reported by the Division of Financial Regulation in its [September, 2024 report](#) to the Oregon Legislature (page 19). * If HB 2041 were in effect today, that amount would be \$270. At that rate, a Master's level therapist seeing 20 clients per week could easily make four times the average public school teacher salary. Market forces often create salary discrepancies that don't seem "fair." Let's not mandate greater inequity through legislation.

Dr. Reed did a good job of explaining the role of Medicare in setting rates. An LPC or LCSW has less training, lower sunk costs, and a narrower scope of practice than a psychiatrist. Medicare recognizes this and allows 75% of the MD rate for master's level therapists. This bill would deviate significantly from Medicare methodology.

In addition to not making sense on the merits, HB 2041 would substantially increase healthcare costs overall. Moda was asked to do a fiscal analysis for state plans--our actuarial team estimates a +1.5% fiscal impact. Many Oregonians must meet deductibles before their insurance pays.

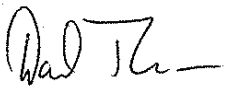
Health plans provided by Moda Health Plan, Inc.

Having to pay an LPC or LCSW \$270 out of pocket per visit could put psychotherapy outside of reach for many of these Oregonians.

I honor the intentions behind this bill. But because it would significantly increase costs, is unnecessary, and is inequitable, I encourage the committee to not advance this bill.

Thank you again for this opportunity to testify.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Thoma", with a horizontal line extending to the right.

Dan Thoma, LPC
Director, Behavioral Health
Moda Health

*The table on page 21 shows lower rates for 90837; this table is clearly in error, with the rates for 90834 copied over into the 90837 column. [DFR's 2023 report](#) does not have this error.