



HB 2015-2 – Address barriers to residential treatment

Chair Nosse, Vice Chairs Nelson and Javadi, Members of the Committee,

On behalf of the Association of Community Mental Health Programs (AOCMHP), I am writing to express our support for HB 2015-2, to address numerous administrative, licensing and financial barriers to residential treatment in the community to prevent institutional care or incarceration. AOCMHP represents CMHPs statewide, some of whom are residential providers and all of whom rely on residential treatment for community members who need this level of care.

We are particularly concerned about the overly broad interpretation of HCBS applied to residential treatment facilities and homes, making it impossible for these residential providers to offer therapeutic environments for their clients. HCBS requirements should never have been applied to these types of residential programs in Oregon. HCBS is more suited for supported housing programs where the clients are actually tenants and not in residential treatment. Below are examples of inappropriate HCBS application:

- Residents in a facility can have visitors of their choosing at any time day or night. This presents risks to other residents as visitors may not be safe, especially in a residential environment.
- Residents are not required to attend treatment as part of the program even though they are admitted with the understanding that they will engage in mental health and addiction treatment.
- Residents are free to come and go as they choose. While generally this is not a problem, new residents are asked to have someone with them while in the community for the first two weeks while they are adjusting to the program. It becomes a significant safety issue if they leave before they are stable and able to care for themselves.
- Evictions follow landlord tenant laws which makes it very difficult to evict people who are threatening to others or not engaging in any treatment activities.

We are acutely aware of the urgent need to build residential capacity across Oregon. These unnecessary barriers are impeding our progress and getting in the way of therapeutic care for individuals who need residential treatment in order to remain in their communities or step down from higher levels of care. Please help us to be successful in building and sustaining residential treatment capacity in our communities by supporting HB 2015-2.

Sincerely,

Cherryl L. Ramirez
Executive Director, AOCMHP