



Dear Senate Human Services Committee,

As an Executive Director of Kinship House a 19 year old nonprofit serving the mental health and permanency needs of foster and adoptive children in the Portland Metro area and providing Special Permanency Assessments utilized across the entire state of Oregon. And a native Oregonian who has worked in Mental Health both as a clinician and administrator with the most vulnerable populations since 1997. I write of my concern in regards to **SB 831** and **SB 832** and the consequences that may occur if passed.

**Problems raised by these bills**

- Agencies will bear the costs of regulations designed to maintain compliance with CMS requirement, while private practitioners will practice unregulated.
- Directing OHA to make rules is premature and will restrict CCOs in the many experimental adaptations of integrated care in which they are engaging including peer services and mentors.
- Many of the best integrated care models require a workforce that is a mix of licensed professionals and unlicensed providers performing a variety of crucial roles. This includes interns who are not licensed, possibly creating an even larger workforce crisis.
- Oregon depends upon a workforce of master's level behavioral health clinicians qualified under **strict rules** for competency. Requiring licenses instead will risk the employment of **hundreds** of experienced clinicians who carry years of training and experience and put at risk the care of thousands of OHP members.
- End result could be more costly care and reduction in access for individuals with high acuity or chronic concerns, particularly during a time when access to care is already under strain.
- There is nothing about contracting with individuals who are licensed mental health professionals that integrates or promotes person-centered care, but the bill makes it seem like there is an equivalence.

I sincerely request you do not move these bills. If you have further questions in regards to these concerns please do not hesitate to contact me.

Best regards

Heather Jefferis  
Executive Director  
Kinship House