



February 11, 2017

Dear Chair Gelser, Vice-Chair Olsen, and Senate Human Services Committee members,

The Coalition of Oregon Professional Associations for Counseling & Therapy (COPACT) oppose SB 48, which would place onerous and expensive reporting burdens on the association, as well as requiring them to create continuing education programs that the association does not have the resources to implement or manage.

COPACT's members – Oregon's Licensed Professional Counselors and Marriage and Family Therapists – intimately understand the need for suicide risk assessment and prevention. They are often on the front lines of diagnosis and treatment of mental and behavioral health ailments that ultimately lead to suicide. And more, private practitioners do so without the cover of an agency to address their practice concerns of liability. However, SB 48 offers an ultimately onerous solution.

Section 1 of SB 48 places a large reporting burden on the Board of Licensed Professional Counselors and Therapists, and is likely to come with a large fiscal impact to collect and maintain that data. Since licensing boards are funded with Other Funds – often fees from their licensees, COPACT concerned that there would be an increase in fees passed along to members and ultimately to the patients accessing care to pay for this mandate.

The organizing, offering and promotion of opportunities for continuing education regarding suicide risk assessments, located in Section 2, is a difficult requirement for our small professional member organizations such as Oregon Counselors Association (ORCA) and Oregon Association of Marriage and Family Therapists (OAMFT). In recent years, they have stepped away from offering CME trainings due to the increased availability of less expensive trainings through large organization, and the increase access to online trainings allowing licensed professionals to complete anywhere. Creating new trainings, when they already have chosen to allow members to access them for alternative sources, would be an unreasonable burden and difficult to implement. Additionally, ORCA organizes an annual conference, and would find establishing a quarterly program difficult to implement.

Our concerns are about the precedent being set for defining what CEUs would best serve all clinicians and the costs of obligating professional associations to focus on particular social maladies. Similar concerns could easily be raised by advocates to address such maladies as abuse, or addictions, or trauma – all of which deserve attention. But obligating how that gets realized and actualized in trainings will certainly do so at the expense and attention of other justifiable concerns.

COPACT respectfully urges the committee to vote No on SB 48 and the -1 amendments, as it would place an expensive and onerous burden on the smaller professional associations to collect, manage and report data as well as creating, implementing and promoting continuing education programs that are not already in place.