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**TO:** Chair of the House Committee on Behavioral Health Representative, Mitch Greenlick, and Committee Members

**RE:** Public Hearing for HB4031; Opposition to HB4031 Section 1

Thank you for this opportunity to comment on House Bill 4031. I am a licensed professional counselor (LPC) and certified Hakomi therapist and trainer, with a private counseling and consulting practice in Portland. I co-direct a training organization that teaches mindfulness-based therapy to licensed counselors and therapists, graduate counseling students and alternative counseling therapists (ACT). I have been in the counseling field for more than 20 years, with direct involvement in mainstream and non-mainstream clinical worlds.

Section 1 of HB4031 will impact non-licensed alternative counseling therapists in Oregon. As an educator, consultant to and colleague of both licensed and unlicensed alternative therapists, I have substantial concerns about categorically excluding unlicensed providers from the behavioral healthcare market place. As such, I am advocating for a practical and ethical model to protect the public and offer professional support for and regulation of ACTs in the state.

**SUMMARY:**

HB4031 Section 1 contains a provision that would remove the portion of ORS 675.825 that protects the right to practice for alternative counseling therapists in Oregon – it deletes ORS 675.825 (4)(a) and 675.825 (4)(b). I'm opposed to removing 675.825 (4)(a-b) because without those protections, alternative therapy practice in Oregon might very well be prohibited.

I support three goals: (1) that Oregonians have continued access to alternative therapies and alternative counseling therapists, (2) that Oregon alternative counseling therapists have protection as a professional group and (3) that the public has appropriate and robust consumer protection.

**BACKGROUND:**

Alternative counseling therapists generally receive significant training and education in specific modalities and psychological and change theories from respected institutions. These institutes have international reach and long histories in the field of psychotherapy. Some examples in Oregon include the Process

Work Institute; the Hakomi Institute and its local affiliate (which I co-direct), Mindful Experiential Therapy Approaches, LLC, (M.E.T.A.); the Gestalt Therapy Training Center; and the Institute of Core Energetics. These professional institutes typically offer credentialing in their specific modality that requires a rigorous multi-year process. In my case, becoming a Hakomi therapist and eventually trainer was a 10-year process, significantly longer than getting my graduate degree and professional counseling license.

In my role as a private practice clinician and trainer of clinicians, I have seen how critical ongoing training and support is for both licensed and unlicensed practitioners. Though being a therapist is rewarding and socially valued, it is also complex and taxing, requiring knowledge, skills, dedication, and willingness to evolve as a human being in service to our clients. This is not a job for the faint of heart or the complacent.

Since being a counselor is a role that has both intended and unintended impact, as with licensed counselors, alternative counseling therapists should receive ongoing professional oversight and support. This contributes to quality of service, protection of vulnerable clients, and career satisfaction and stability.

My experience has also demonstrated to me the value to the public of the contributions of alternative methods and practitioners. I get requests on a regular basis for referrals to certified Hakomi therapists. Some people want this form of mindful counseling and cannot always access it in all mental health service environments. This is also true for other alternative modalities.

#### **PROPOSED SYSTEMIC CHANGE:**

To foster a supportive environment within which alternative counseling therapists can safely practice and clients are more protected, I support implementing a registry system in Oregon similar to the model successfully employed in the state of Vermont.

The Vermont model is a statewide registry of alternative practitioners with the following guidelines:

- (1) Distribution of professional training disclosure statements;
- (2) Expectation of adherence to explicit standards for ethical and professional conduct;
- (3) Accountability of registrants through a complaint and disciplinary process;
- (4) Ineligibility for inclusion on the registry for any provider whose credentials have been revoked;
- (5) A clear funding mechanism based on provider fees;
- (6) A professionally diverse board made up of members from the general public, an unlicensed alternative therapist, licensed clinical mental health

counselors, and a licensed marriage and family therapist.

I also believe requiring malpractice insurance and completing a set number of hours of continuing education and/or professional consultation annually makes sense. An additional benefit might be offering ACTs reduced or subsidized continuing education courses in ethics and other related professional topics.

**CLOSING:**

Fundamentally, I am suggesting we continue to allow the benefits provided by alternative counseling therapists, while at the same time evolving and improving support for and regulation of these non-traditionally prepared and credentialed professionals. Prohibiting them from practicing in Oregon is not the solution and limits the availability of these services. It is better that we support ACTs so they may continue to do and improve their good work. In addition, professional regulation and accountability will strengthen public trust and protection, and ensure unethical or harmful behavior can be reported and mitigated.

Thank you for considering these ideas.