

May 9, 2021

Attn: Oregon Health Freedom Coalition – **Concerns regarding HB 2394**

Dear Legislators,

I'm writing to you as a citizen of Salem, Oregon who works as a Hypnotherapist, Personal and Professional Coach, Trainer and Consultant. I have been a practicing certified Clinical Hypnotherapist with 29 years of experience. I am also a certified Hypnotherapy Instructor and Designated Examiner with the American Council of Hypnotist Examiners (ACHE). I am a Coach University graduate and practicing Personal and Professional Coach since 1998.

Like you and my fellow practitioners, I'm very concerned about the welfare of Oregonians as well as the practices of alternative and commentary health care practices.

Like many of my colleagues, I applaud the Oregon legislature for working hard during these difficult times, and I do share the following serious concerns about HB 2394:

1. A similar bill was introduced in 2017 and was tabled because there was a huge outcry against it - because we don't want or need more regulations and an oversight board.
2. The bill labels the current situation as an **emergency** situation and threat to public safety. But there has been no documentation that there has been a public safety threat.
3. Complementary and alternative healers don't practice medicine or mental health counseling and should not be regulated in the same way as medical and mental that counselling is regulated by professional boards. Most of us spend a great deal of time training initially and also spend a lot of time in continuing education.
4. It is not in an alternative healthcare provider's job description to assess, diagnose or treat a mental, emotional, or behavioral disorder.
5. This bill takes away the right of Oregonians to choose their own healthcare providers.
6. The definition of alternative well-being provider is too vague. Care givers, certain types of ministries, and other professions fall under the given definition.
7. Too many professions that have no relationship with each other have been lumped together into one category.
8. Alternative health care providers have no say as to who is to govern them.
9. There is no provision to put alternative healthcare providers on the governing boards.
10. The passage of this bill would put many Oregon healthcare practitioners out of work during difficult times.
11. We don't want to face this every few years – and have a better approach that 11 other states use as their model of legislation. Its formal name is the **Oregon Consumer Access and right to Practice Complementary and Alternative Health Care Act**. (Working name: **Safe Harbor Exemption** for short) Many other states are introducing or preparing to introduce. **It has guardrails** that practitioners need to stay within and includes disclosed about what training and experience a practitioner has. If a practice violates these, then there is legal recourse with laws that already in place.

For the professions named here that I have experience with, I can attest that Hypnotherapists and Coaches generally work with skill-based training and professional organizations to obtain the knowledge, skills and methods to serve in their chosen professions. Each of these credentialing organizations has their own sets of professional and ethical standards, competency assessments and

certification processes. Many also have established procedures to address issues, concerns or complaints a client may have about a specific practitioner.

Though many of these named professions may overlap in some ways, each of them has a distinct set of principles, practices and processes unique to those professions. As hypnotherapists and coaches, we are instructed and strongly directed to stay within the scope of our knowledge and training and to not misrepresent ourselves as practicing professions we are not – such as medicine, counseling, psychotherapy or psychiatry. It is also very important that practitioners of these professions also don't misrepresent themselves as practicing hypnotherapy, coaching or other skill sets if they are not properly trained and certified as well.

Hypnotherapy and coaching professional organizations such as ACHE, the International Coaching Federation and the National Guild of Hypnotists have fought for many years to distinguish themselves as unique professions. We generally don't reference the medical model of mental illness. We don't identify mental illnesses nor do we diagnose, prescribe or treat them.

We reference many other models, principles, strategies and techniques to help clients define their outcomes and how to organize themselves to achieve them. Our professional organizations have well-established training curriculum, assessment and certification processes, codes of ethics and corrective practices in place if there are problems with practitioners.

HB 2394 is not only **unnecessary** for these professions but would also be **detrimental** to thousands of practitioners' businesses in Oregon. Additionally, it limits the freedom of choice to our citizens to seek the kind of services they want to assist in making the changes they want to make.

HB 2394 also contains problematic language in that it purports to be a registration requirement when it is actually a licensure requirement with all of its regulations, fees, government oversight, etc. The legislation also does not specify the standards and requirements for training, certification and/or licensure for these professions. The legislation also does not specify who would have the appropriate expertise and authority to make those determinations. We cannot agree to such legislation until we clearly understand the specific standards, requirements and assessment processes involved for each of these professions.

Since this proposed legislation is problematic on multiple levels, it is our formal request that any voting or approval of this legislation be postponed until there can be further discussion and input from the various practitioner groups involved and resolve the multiple problems and issues this amendment would generate as written.

If this legislative body is sincere in protecting the public, supporting small businesses and making a wide range of services available to the citizens for their benefit, then this amendment deserves more time and work so that it fulfills its intent and does no harm to practitioners nor the public.

Thank you,

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