

Thank you to the committee for hosting this informative session today, and thank you especially to those who spoke this morning about the history of this year's HB2493 and the group that's been working on the problem as they perceive it. I found Mr. Shostek's comments particularly informative, and think I have a better grasp on why this legislation is being proposed.

If I understand correctly based on what I heard today, the issue at hand is basically that the state's governing board for behavioral and mental health (the OBLPCT?) is finding itself spending a problematic portion of its time and resources addressing complaints about persons who are not (and should not be) its licensees but who are nevertheless improperly diagnosing DSM-5 mental illness - an activity which Oregon law has restricted to the practices of its licensed professional counselors and therapists. The goal in this case is therefore to reduce this drain on that board's time and resources.

I'm concerned that this working group has set itself a Sisyphean task - one that is literally impossible to accomplish. Particularly if it seeks to remedy the situation with additional legislation and oversight, surely the result must be a net increase in time and resources spent by oversight bodies generally (including the newly proposed ones)?

I encourage the working group to consider alternatives to additional legislation, such as an informational or educational campaign about the current law. In light of my earlier written testimony, I would also encourage the working group to investigate how perhaps the problematic drain on this board's resources could be addressed by *reducing* the impact of occupational licensure in its purview. Since the problem at hand is one that is created by the system of occupational licensure itself, perhaps the root remedy is in recalibrating the level of occupational licensure truly required for effective benefit to public health and consumer safety?

I hope my testimony here and earlier can be received as constructive comment. As someone who does a fair amount of consultation and troubleshooting for a living, I do not find much value for my customers in supporting or trying to modify futile solutions that do not get to the root of a problem. However, I do aspire to help folks better identify the root issues at hand, so that a real answer to the real concern can be collaboratively discovered and implemented. Sometimes, as I hope is the case today, that means speaking in opposition to a futile proposal, so that time and resources might be redirected to more effective ones.

I wish you all the best of luck in your endeavor, and thank you again for the opportunity to testify.

Sincerely,

Jim Axling