

Submitter: Peter Addy
On Behalf Of:
Committee: Senate Committee On Health Care
Measure: SB303

I am writing to encourage you to vote no on SB 303 as written.

I am a therapist in Portland and both faculty and student in an OHA and HECC approved psilocybin facilitator training program. For seven years I was a data scientist with Yale School of Medicine and the Department of Veterans Affairs. When I was doing medical informatics work, I would have loved to have access to the kind of dataset that SB 303 would create. Comprehensively collected data on real world interventions and outcomes is incredible to work with, and a good analysis can influence public policy and improve outcomes and quality of life for large and diverse populations. However, I am in fact opposed to SB 303 for several reasons.

SB 303 sections 2 and 3 require service center operators and facilitators to collect and report personally identifiable client data. This creates additional burden and expense for operators and facilitators. SB 303 does not include any funding mechanism, thereby increasing costs of operating a service center and likely increasing costs for clients to access services. This is against the stated position of Oregon Psilocybin Services to be centered on equity and inclusion.

Also, from my medical informatics days I can assure you that data collected by under-trained and underpaid personnel is worse than useless. Poor quality data takes additional time and effort for data scientists to clean, and can actively work against the nature of the project. The concept "garbage in, garbage out" applies here: service center operators and facilitators with no training in research methodology or data collection standards and with no financial incentive to produce good work are unlikely to produce good work. I've seen it many times and it is frustrating and unsatisfactory for all involved.

SB 303 sections 2 and 3 mandates that data be collected "in a manner that protects personally identified information of clients and individuals". That's a nice sentiment, but it's meaningless without specifics as to what that entails and how it will be enforced.

SB 303 specifies that OHSU will exclusively be in charge of this data repository. Is it usual to name a university without any application or public process? It seems to me that's an unfair and unearned advantage over other universities and academic centers in the state.

SB 303 section 4 is better. OHA is already collecting most of this data for license

applications and licensees. It will be very useful to publish this de-identified data so that the general public, researchers, and people who want to create similar programs in other states can see how equitable the license system here is. However, I am still concerned that OHSU is named specifically in the law, removing any chance of competition or collaboration with other academic partners.

My suggestions:

Such a data collection program would undoubtedly help the advancement of science and healthcare in Oregon and throughout the nation. This is the proper domain of one or more academic research studies. OHSU or whomever should create a data repository study through an appropriate Institutional Review Board. They should allocate research dollars to train data collection personnel and ensure data security in transmission and at rest. If OHA wants to be involved in research, put out a Request For Applications (RFA) or Program Announcement (PA) so that all academic centers in Oregon have the opportunity to accomplish the stated program objectives.

Rewrite the bill to remove sections 2, 3, and 5. Remove mention of OHSU from section 4. Either have OHA publish the information themselves or publish an RFA or PA so that the best center for the job gets the contract.

Thank you for your consideration,
Peter H Addy, PhD