

Submitter: Amy Green  
On Behalf Of: HB 4028  
Committee: House Committee On Behavioral Health  
Measure, Appointment or Topic: HB4028  
To: Chair Pham and Members of the Behavioral Health and Health Care  
Re: Support for HB 4028 – Protecting Mental Health Providers and Patient Access

Dear Chair Pham and Members of the Behavioral Health Committee,

My name is Amy Green, and I am a Licensed Marriage and Family Therapist practicing in Oregon, California, and Washington. I have been dedicated to this field since 2006, serving in various roles, including quality assurance manager for both community and private mental health organizations, and utilization manager for the largest commercial insurance company in the nation. My experience spans oversight and auditing of behavioral health services for Medicaid, Medicare, and commercial insurance across the United States.

I am currently employed as a Quality Assurance Manager for a large private group practice providing outpatient mental health services to over 800 clients per month, including members of Medicaid, Medicare, and commercial insurance. My role is to ensure clinical oversight, compliance with state regulations, and adherence to managed care requirements regarding quality and access to care. This includes navigating increasingly complex and frequent insurance audits, which have become a source of significant stress and instability for our providers.

I am writing to express my strong support for HB 4028. This bill is crucial for protecting small and independent mental health providers from aggressive and often punitive insurance practices. Each year, audits grow more frequent and the standards we are expected to meet shift, often without clear communication or transparency. Despite our commitment to delivering ethical, necessary, and high-quality care, the fear of denied claims or repayment demands due to minor technical errors is ever-present. These retroactive denials and recoupments are frequently based on administrative details rather than the actual medical necessity or quality of care provided.

The ongoing threat of lost income and the substantial resources required to defend against these audits create extreme stress and burnout among staff and providers. Our practice has had to dedicate nearly one full-time staff member for every five providers just to manage documentation and audit requirements. This is unsustainable and forces many highly qualified clinicians to consider leaving insurance networks, or the profession entirely, to protect their licenses and focus on client care. When providers are pushed out in this way, it is ultimately clients who suffer, as access to care is reduced for those who cannot afford to pay out-of-pocket. Oregon is already facing a mental health provider shortage. Without reasonable

protections and clear standards, insurance practices will continue to drive providers away and worsen this crisis. HB 4028 recognizes the imbalance of power between insurance companies and group practices or solo mental health providers. It addresses the growing pattern of retroactive denials and recoupments for legitimately delivered services and takes meaningful steps to restore fairness and stability. By establishing transparent and consistent documentation requirements and ensuring that recoupments are only approved when services were not medically necessary based on standardized criteria, HB 4028 will help providers remain financially stable and focused on delivering high-quality care. This bill supports both providers and the communities we serve by safeguarding access to mental health care for Oregonians. Thank you for your leadership and for your support of HB 4028. I appreciate your commitment to protecting mental health providers and ensuring continued access to care for those most in need.

Sincerely,

Amy Green, LMFT  
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Quality Assurance Manager  
Portland, Oregon