

Submitter: Laura Roberts  
On Behalf Of: Cornerstone Clinical Services  
Committee: House Committee On Behavioral Health  
Measure, Appointment or Topic: HB4028

Dear Oregon State Legislators,

I am writing to you to request your strong support for the 2026 Behavioral Health Protection Bill. This vital legislation establishes fair and transparent standards for insurance companies when conducting behavioral health audits and seeking financial clawbacks from providers. As an owner partner of a multi-site behavioral health clinic (Cornerstone Clinical Services, P.C. in Milwaukie and Tigard), and Director of Quality Assurance, I represent over 20 psychiatrists, psychologists and Licensed Professional Counselors who are experiencing significant concern about this issue.

Currently, many Oregon behavioral health clinics face unpredictable and inconsistent audit practices from commercial insurers. Clinics are often required to return large sums of money immediately—even when documentation discrepancies are minor or unintentional. At times, these audits are prompted by A.I. reviews of billing codes without an appropriate assessment of the supportive documentation in the medical record. These sudden financial demands can devastate small, privately owned behavioral health practices, many of which operate with thin margins while providing essential care to our communities.

The Behavioral Health Protection Bill proposes clear parameters for insurance company actions, including:

- o Requiring transparency from insurers and CCOs by making their documentation requirements explicit and available to providers prior to conducting audits.
- o Establishing reasonable and uniform procedures and timelines for conducting audits of providers.
- o Mandating that insurers allow providers to correct minor clerical errors before demanding repayment.
- o Ensuring that providers have due process and adequate time to respond to audit findings.

Such reforms will create accountability and consistency while preserving the viability of community-based behavioral health clinics. Without these protections, Oregon risks further loss of clinics and practitioners who may be forced to resign from commercial panels to stay financially solvent. It's already difficult for our citizens find behavioral health providers that are on insurance panels (which is one of the reasons that Cornerstone holds preferred provider positions with almost all commercial

insurance panels). The resulting reduction in access to behavioral health services would have devastating consequences for Oregon residents, particularly at a time when our state already faces serious challenges in meeting the growing demand for mental health and addiction treatment. This protection is also a valuable step in maintaining the private ownership of such clinics, considering the actions of venture capitalist companies and insurance companies themselves attempting to purchase group behavioral health practices, a step that increases the risk of profits being placed above patient care.

By supporting the 2026 Behavioral Health Protection Bill, you will help safeguard Oregon's behavioral health workforce, stabilize clinical operations, and ensure sustainable access to care for individuals and families across the state, at no cost to the state coffers.

Thank you for your leadership and for recognizing the importance of protecting behavioral health providers and the Oregonians who rely on them.

Sincerely,

Laura Anne Roberts, Psy.D.  
Licensed Psychologist in OR and WA  
Cornerstone Clinical Services, P.C.