

## **Testimony Opposing HB 4083**

Chair and Members of the House Committee on Behavioral Health:

Thank you for the opportunity to submit testimony today. I am writing in opposition to HB 4083.

I want to begin by acknowledging the intent behind this bill. Oregon is in a behavioral-health workforce crisis. Increasing access, reducing administrative burden, and improving equity are urgent goals, and ones I support wholeheartedly. The spirit of the bill is commendable.

But HB 4083 is not the appropriate pathway to achieve these aims.

### **1. Merging the Oregon Board of Licensed Social Workers With Other Mental Health Boards Misrepresents Social Work and Its Full Scope**

HB 4083 brings the State Board of Licensed Social Workers (SBLSW) under the Mental Health Regulatory Agency, implying that social work is simply one category within mental-health treatment.

This assumption is incorrect.

Social work is a profession defined by its ability to operate on the micro, mezzo, and macro levels.

Social workers serve individuals, families, groups, communities, and systems. Our work spans:

- direct client services
- community organizing
- policy development
- administration and leadership
- social justice and equity work
- healthcare and public health
- crisis response and safety planning
- system redesign and advocacy at the population level

Not all social workers become clinical social workers, and not all social work is mental-health treatment.

The Oregon BLSW licenses *all* social workers, not just those whose practice includes behavioral health services.

Bringing the SBLSW under a mental-health-specific regulatory body narrows the public's understanding of the field and diminishes a profession designed to operate across societal, organizational, and community systems, not solely within clinical encounters.

This change risks erasing the very breadth that makes social work essential in addressing the social drivers and systemic inequities that shape Oregonians' health and well-being.

### **2. Allowing Non–Social Work Providers to Supervise Social Workers Endangers Ethical and Professional Integrity**

HB 4083 requires licensing boards to allow supervision of social workers by professionals outside the field. This raises significant concerns:

- a. Distinct Ethical Frameworks

Social workers are trained and regulated through the NASW Code of Ethics, which places strong expectations on:

- social justice
- dignity and worth of the person
- professional and organizational integrity
- complex boundary management
- advocacy and systemic intervention
- cultural responsiveness
- ethical decision-making within unequal systems
- responsibilities to vulnerable populations

Other behavioral-health professions have ethical frameworks too, but they are not interchangeable.

If a social worker is supervised by someone outside the profession, they cannot be adequately trained or evaluated in the ethical standards they are legally required to uphold. This is not a small technicality; it goes to the heart of client protection and professional competence.

#### b. Public Protection and Professional Identity

Clinical supervision is not simply oversight; it is the mechanism through which a profession transmits its standards, values, and obligations.

A supervisor who has never practiced social work is not positioned to:

- evaluate whether the supervisee is meeting social-work-specific ethical requirements
- guide the supervisee through ethical dilemmas unique to social work practice
- ensure integration of systems-level thinking, advocacy expectations, cultural-responsiveness standards, and macro-level obligations

This weakens professional identity, jeopardizes the development of competent practitioners, and ultimately compromises client safety.

### 3. Workforce Shortages Cannot Be Solved by Reducing Standards

Oregon desperately needs a larger behavioral health workforce.

But expanding the pool of “eligible supervisors” by lowering standards does not solve the shortage; it transfers risk to clients and erodes professional rigor.

If the Legislature wants more qualified social work supervisors, there are far more appropriate strategies:

- fund supervisor-training programs
- provide loan-repayment incentives for LCSWs who supervise
- reduce administrative barriers to supervisor certification
- support workforce pipelines without diluting professional oversight

Oregonians deserve more providers, not less qualified ones.

### 4. Consolidation Threatens Cultural Responsiveness, Systemic Perspective, and Quality of Care

Social work education is built upon:

- trauma-informed practice
- equity and anti-oppressive frameworks
- systems-level analysis
- advocacy within unequal power structures
- cultural humility
- understanding social and structural determinants of health

These elements are core to the profession, not peripheral enhancements or optional modules. They provide the foundation that ensures social workers can navigate complex social, cultural, and systemic landscapes affecting vulnerable populations. Collapsing regulatory structures risks diminishing these essential, foundational components of practice.

## 5. Administrative Streamlining Is Possible Without Restructuring the Social Work Profession

The bill's stated aims, uniform credentialing, centralized portals, reduced administrative redundancy, are laudable and necessary.

But these goals can be achieved without:

- merging the SBLSW with other mental health boards
- altering supervision requirements
- blurring the lines between distinct behavioral health professions

These components should not be tied together.

The state can reduce administrative burden without weakening professional integrity or public protection.

## Conclusion

I deeply respect the Legislature's efforts to address workforce gaps and reduce barriers to care. Oregon must modernize behavioral health infrastructure and support providers in practicing efficiently and effectively. However, HB 4083 inadvertently undermines the integrity, autonomy, and ethical grounding of the social work profession.

For these reasons, I respectfully urge the Committee not to advance HB 4083 in its current form, and to consider alternative strategies that strengthen the workforce without diminishing the protected standards, ethical foundations, and broad societal role of social workers.

Thank you for your time and thoughtful consideration.

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