

Dear Members of the Oregon Legislative Assembly,

I write in opposition to House Bill 4083 as currently drafted. While I am not opposed to regulatory consolidation in principle, nor to efforts aimed at administrative efficiency, this bill reflects a fundamental misunderstanding of the licensed social work profession—particularly the gross and non-interchangeable differences in ethical standards, statutory obligations, and supervisory requirements as compared to other behavioral health licenses.

The most concerning deficiency in HB 4083 is its implicit assumption that behavioral health licenses operate under substantially similar ethical frameworks. This is demonstrably incorrect. Social work ethics, as codified in statute and rule and grounded in the NASW Code of Ethics, impose uniquely stringent and affirmative obligations that materially exceed those required of other behavioral health licenses. One clear example is the treatment of dual and multiple relationships. For licensed clinical social workers, dual relationships are presumptively prohibited, with narrow, well-defined exceptions that require heightened justification, documentation, and risk analysis. These standards are not mirrored across other behavioral health licenses, where ethical frameworks may allow broader discretion, contextual balancing, or post-hoc justification.

These ethical differences are not academic. They directly govern daily practice in child welfare, court-ordered treatment, forensic evaluation, custody and parenting matters, mandated reporting, and systems-based interventions. Social workers are routinely embedded in overlapping systems—courts, schools, child welfare agencies, tribal governments, and medical settings—where ethical missteps can cause immediate legal harm to clients and families. Supervision in social work is therefore not merely clinical oversight; it is the primary mechanism by which ethical compliance, statutory fidelity, and public protection are maintained.

HB 4083's supervision provisions fail to account for this reality. Allowing cross-licensure supervision without explicit, enforceable safeguards disregards the fact that many licensed professionals outside social work are neither trained in nor accountable to social work's ethical prohibitions and mandates. A supervisor who does not operate under social work ethics cannot reliably supervise compliance with those ethics. This creates foreseeable risk to clients, supervisees, and the public, particularly in high-stakes, court-involved, and child-related matters.

Equally troubling is the proposed transfer of regulatory and administrative authority over the State Board of Licensed Social Workers to the Mental Health Regulatory Agency. While consolidation may be administratively attractive, HB 4083 provides no assurance that social work's distinct ethical framework will be preserved, understood, or enforced within a consolidated structure. Ethics enforcement is not interchangeable across professions. Without license-specific expertise and authority, social work regulation risks being diluted by mental health models that do not share its statutory and ethical foundations.

I am open to structural reform, including consolidation or dissolution of existing boards, provided that any successor entity fully understands and preserves the profound differences among behavioral health licenses. HB 4083 does not meet that standard. As written, it treats ethical and statutory distinctions as minor administrative variations rather than as core public-protection mechanisms.

For these reasons, I oppose HB 4083 in its current form and urge the Legislature to substantially revise the bill to explicitly recognize and safeguard the unique ethical, supervisory, and statutory obligations of licensed social workers.

Respectfully,

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