

Submitter: Erin Howe  
On Behalf Of:  
Committee: House Committee On Behavioral Health  
Measure, Appointment or Topic: HB4028

My name is Erin Howe, and I am a licensed therapist practicing independently in Portland, Oregon through my small private practice. I am writing to express my strong support for HB 4028.

As a solo mental health provider who serves insured clients, I have firsthand experience with the increasingly aggressive and punitive nature of insurance audits. Each year, these audits become more frequent, more opaque, and more time-consuming, requiring extensive unpaid labor to defend documentation that reflects ethical, medically necessary, and clinically appropriate care. Standards often shift without clear guidance, leaving providers vulnerable to retroactive denials or repayment demands over minor technicalities rather than quality of care.

The constant threat of recoupment creates real financial instability and chronic stress. Time spent responding to audits is time taken away from client care, clinical supervision, and professional sustainability. Like many therapists across Oregon, I have seriously considered limiting my acceptance of insurance, or leaving insurance panels altogether, because of this ongoing pressure. When independent providers are pushed out in this way, access to care for insured clients, including those with complex or long-term needs, is directly harmed.

HB 4028 appropriately recognizes the disproportionate power insurance companies currently hold over small and solo mental health providers. It addresses the growing pattern of retroactive audits and recoupments for legitimately delivered services and takes meaningful steps to rebalance this dynamic by establishing clearer standards and reasonable protections.

By reducing unnecessary administrative burden and financial risk, HB 4028 will help sustain the independent mental health workforce that Oregon relies on. It will allow providers like me to remain in network, continue serving insured clients, and focus our energy where it belongs: on providing high-quality, ethical mental health care to Oregonians.

Thank you for your leadership and for your consideration of this critical legislation. I appreciate your commitment to protecting access to mental health care and the providers who deliver it.

Sincerely,

Erin Howe, LMFT  
Portland, Oregon