

Submitter: Bax White  
On Behalf Of:  
Committee: House Committee On Behavioral Health  
Measure, Appointment or Topic: HB4028

Dear Chair Pham and Members of the Committee,

My name is Bax Wilder White, and I am a Licensed Clinical Social Worker (LCSW) in practice in Portland, Oregon. I have been practicing in Oregon since 2022, specializing in trauma treatment and Internal Family Systems (IFS) therapy. I am writing to express my strong support for HB 4028.

I believe specialized trauma care should be accessible to everyone, not just those who can afford to pay out-of-pocket. However, the current system places an undue burden on providers who are often required to draft documentation without clear expectations from insurance providers, only to face the risk that they will later audit those notes and subjectively determine they do not meet their internal standards.

IFS is a highly specialized therapy that is already difficult for patients to find within insurance networks. The current administrative burdens and financial risks threaten access to these specific services.

Clarity of Standards: We need direct expectations articulated by insurance payers regarding what clinical documentation must include. Operating without this guidance creates a constant fear of retroactively denied claims for the ethical and evidence-based care clinicians have already provided.

The "Clawback" Threat: Without protection around time limitations for recoupment demands ("clawbacks"), the financial risk of providers staying in-network is becoming too high to justify.

If specialized providers leave insurance networks, effective trauma treatment becomes a luxury accessible only to the wealthy, rather than a resource for all Oregonians. HB 4028 would change this calculation. By establishing clear documentation standards and reasonable audit timeframes, this bill would provide the stability providers need to feel confident remaining in-network with insurance providers and accepting more insurance clients. HB 4028 helps providers remain financially stable and keeps the focus on delivering high-quality mental health care.

Thank you for your leadership and for your support of HB 4028.

Sincerely,  
Bax Wilder White, LCSW