

Submitter: Carrie Farrell
On Behalf Of:
Committee: Senate Committee On Health Care
Measure, Appointment or Topic: HB4028

Dear Chair Patterson, Vice-Chair Hayden, and Members of the Senate Committee on Health Care,

My name is Carrie Farrell, and I am a Licensed Professional Counselor practicing in Portland, Oregon. I am writing to respectfully urge you to prioritize and support HB 4028, the 2026 Behavioral Health Protection Bill.

I want to share one example of why this bill matters. In my practice, I experienced a prolonged insurance paperwork delay that left me unpaid for approximately six months while I continued seeing insurance clients for continuity of care. During that time, I fell behind by roughly \$20,000 in income. I continued providing care because I did not want to disrupt treatment for my clients, but the financial strain was significant and unsustainable.

Experiences like this have made me very hesitant to take on more insurance clients, even though I know how badly behavioral health care is needed. The ongoing threats and complications related to audits, clawbacks, and unclear or shifting documentation standards create constant pressure. Documentation expectations can feel unclear and punitive, and the fear of making an administrative mistake can haunt providers and threaten the stability of a small practice.

HB 4028 addresses these problems in practical, balanced ways. I support this bill because it:

- Requires insurers and CCOs to communicate more transparently about medical management practices, including what is being applied and when it may trigger audits or clawbacks.
- Reduces clawback windows, which gives providers more predictability and protects small practices from long-term financial risk.
- Creates clearer timelines for completing audits, which helps prevent prolonged uncertainty.
- Allows providers to correct clerical errors instead of being punished for administrative mistakes.
- Allows repayment plans when money is owed, rather than sudden recoupments that

can destabilize a practice.

- Increases reporting and oversight of insurer medical management practices that may restrict behavioral health access.

When providers are exposed to ongoing payment instability and audit risk, many limit the number of insurance clients they can ethically and financially take on—or leave insurance networks altogether. That directly reduces access to care for Oregonians.

HB 4028 is a practical, needed step toward protecting behavioral health access and making it more sustainable for independent providers to stay in-network. I respectfully ask for your support.

Thank you for your time and for your commitment to behavioral health in Oregon.

Sincerely,

Carrie Farrell, LPC
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