



Oregon

Kate Brown, Governor

Board of Licensed Professional Counselors and Therapists

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Dear Stakeholders:

Thank you for taking the time to ask important questions about why there is a proposal to modify the Rules. Please refer to the information below this note, which addresses many of the queries made to the Board.

First and foremost, why modify the Oregon Administrative Rules if they've been working perfectly well for all these years? In short: they haven't been. The OARs for the Board are clunky, lack clarity and do a poor job outlining procedures for staff. This leads to long wait times for questions to be answered as staff has to present requests to the full Board, which meets bi-monthly. In some places the Rules were vague or seemed to contradict between sections.

It was necessary to begin a focused effort to improve upon the overall effectiveness of our systems and procedures within all components of Board operations which includes: licensing, renewal of licensing, and compliance and enforcement. The Board determined to take a comprehensive approach and deal with all sections one-by-one, and to introduce one proposed rulemaking package due to the interrelatedness of the various sections. This work is foundational to the comprehensive work that will follow in improving the overall efficiencies and processes of our daily work.

The Laws and Rules Committee worked to:

- Streamline the OAR's;
- Restructure Sections for better flow;
- Eliminate grey and vague language, consistent with the State's "Plain Language" policies;
- Make the Rules easier to administer; and
- Eliminate significant redundant verbiage.

Easier to administer means clear and consistent answers for interns and licensees. Easier to administer means clear and more useful forms on the Board's website. Easier to administer means less staff time spent on routine questions and more time available for more complex licensing issues.

With this proposal, rules are updated, reorganized and reworded for clarity. A lot of redundant language was removed. Even with many important additions, this draft uses 2,977 fewer words—an 18% reduction.

This is not the most significant volume of changes the Board has made in recent times. The currently proposed changes to the rule text, which amount to 75 pages are considerably less than the 142 pages of changes that took place in 2010.

Our goal is to be transparent through all Board processes. Please refer often to the website to be up-to-date on meetings that may be of interest to you. The LRC has produced a superior set of Rules and achieved a very unique balance that takes into consideration the Profession and the Board's responsibility to protect the public. We are especially proud the full Board supported the LRC's recommendation for creating an inactive status. This will be a relief for many of our licensees who wish to retain their credentials but are choosing to not practice for a period of time. The counseling profession is growing rapidly in the state of Oregon and we strive to serve both consumers and licensees.

Best,

Charles Hill, Executive Director OBLPCT
Lindsay McGrath, LMFT Board Chair OBLPCT