



Oregon

Tina Kotek, Governor

Mental Health Regulatory Agency

Board of Licensed Professional Counselors and Therapists

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Date: January 6, 2026
To: The Board of Licensed Professional Counselors and Therapists
From: LaReé Stashek, Hearings Officer
Subject: Report on Rulemaking Hearing

Hearing Date: December 22, 2025
Hearing Location: Via Zoom Videoconference
Rule Caption: Educational requirements for unaccredited programs.

The rulemaking hearing on the proposed rules was convened at 9:03 a.m. Attendees were asked to enter their name and organization (if applicable) into the chat if they wished to comment on the proposed rules. They were informed of the procedures for taking comments, and notified that the hearing was being recorded. Before receiving comment, I summarized the proposed rules. The following attendees presented oral comments:

1. **Marie Jackson:** Marie is a qualified mental health professional and certified drug and alcohol counselor in Oregon, and a licensed mental health counselor in Washington. She has completed about 9 ½ years of public service in Oregon as a mental health professional, but is ineligible for licensure in Oregon because her school, Seattle School of Theology and Psychology, is nationally accredited but not regionally accredited.¹ She has been in the profession for about 20 years, is trained in EMDR, specializes in adolescent mental health treatment, and is bilingual in English and Spanish. She has experienced significant professional limitations due to being unlicensed. As a provider who has worked here in rural areas, it's important for her to see access to care addressed. She is appreciative of the Board's work so far to remove barriers, but would like to see more work on this specific issue.
2. **Daniel Tidwell-Davis:** Daniel is the Director of Student and Academic Services at the Seattle School of Theology and Psychology, speaking on behalf of program alumni who reside in Oregon and have been denied licensure on the basis of the existing rules governing the evaluation of degrees from unaccredited programs. He is grateful that the Board is considering the rule change, but believes additional changes are needed to avoid unintended consequences. The proposal continues to only allow regional accreditation for institutions, which does not align with 2020 guidance from the U.S. Department of Education (USDOE) that indicates regional and national accreditation are equivalent, both

¹ Your Hearings Officer notes that throughout the hearing, the term "nationally accredited" was used to describe an institution that is accredited by an institutional accrediting body that is recognized by the U.S. Department of Education (USDOE). In the case of the Seattle School of Theology and Psychology, that accreditor is the Transnational Association of Christian Colleges and Schools. The USDOE Secretary is required to maintain a published list of recognized accrediting agencies, which includes various state licensing boards that are approved as institutional accreditors.

held to the same standards defined by the Council for Higher Education Accreditation (CHEA) and the USDOE. The Board has declined to amend its rule on institutional accreditation. Daniel indicated that the Board has cited Oregon law as requiring regional accreditation², and asks that the Board either 1) produce evidence that the Legislature itself has defined regional accreditation independently of the federal DOE and CHEA, or 2) concede that when the legislation was written, the State depended on these federal bodies to define the type of accreditation, and that the current exclusion of national accreditation contradicts the federal definition that Oregon law relies on. He believes the proposed rule does not evaluate degrees equitably on the merit of the quality and content of the degree, and allows different pathways based on where the education occurred- a foreign degree does not need to meet the criteria that a program within the United States does, creating a different tiered system³. A degree from nationally accredited institution is not evaluated based on its content under this proposed rule. He would like the rule to be re-written to include nationally accredited institutions. He noted that the Board has supported the Legislature's efforts to join the Counseling Compact, but when it does pass, it will create a back door where licensed practitioners from other states with nationally but not regionally accredited degrees will be able to obtain privilege to practice in Oregon, while those who live in Oregon will not be able to become licensed or participate in the Compact. He believes this is discriminatory to qualified mental health practitioners who reside in Oregon, and would negatively impact rural Oregonians who would better benefit from in-person care and small businesses who need to hire local practitioners.

3. **Mary Jane Wilt:** Mary Jane has been practicing since 2007 in Oregon after graduating from the Seattle School of Theology and Psychology. She went through a long process of demonstrating that the curriculum matched up with CACREP standards. She submitted her information to the Office of Degree Authorization which found that her school had regional accreditation equivalency, and she believes that based on that, she was granted a license.⁴ She has since earned her doctorate in marriage and family therapy and has been in private practice for over 20 years. She believes that the process she went through to become licensed was honored and then retracted, seemingly without “due process.”
4. **Nicole Hagerty:** Nicole lives in Vancouver, WA and is a licensed mental health provider in that state, where she has practiced for about ten years. Two years ago, she was hired at a medical clinic that provides services in both states, and her employer would like her to obtain Oregon licensure. She graduated one year after Mary Jane, before the Seattle School of Theology and Psychology became regionally accredited, so she would not be eligible for licensure under the current rules and cannot serve Oregonians at her Oregon

² Your Hearings Officer is unaware of any such representation made by any Board representative. Contrarily, in an email dated February 3, 2025, I informed Daniel that “The Board has broad statutory authority to set educational standards for licensure and may accept (via rule) graduate degrees that are comparable in content and quality to CACREP- and COAMFTE-approved programs.”

³ Your Hearings Officer notes that applying the same institutional accreditation criteria for U.S. programs to foreign degrees would preclude the Board from granting a license to anyone with a degree from outside of this country. USDOE does not recognize foreign accrediting bodies, and only recognizes U.S. accrediting bodies for their activities as they apply to U.S. institutions or programs.

⁴ Your Hearings Officer notes that Mary Jane was qualified for registration in 2005 based on her second master’s degree from an institution that had been regionally accredited by the Higher Learning Commission since 1938.

clinic location. She feels that a change to the rules to follow the national changes would be beneficial because it would allow more people to serve Oregonians.

5. **Brook Jackson:** Brook is an LPC in Oregon and a certified school counselor, and is Marie Jackson's husband. Mental health practitioners are understaffed and overworked. In accordance with his code of ethics, he would like to advocate for changing the standards to allow more providers in Oregon. He wonders about the risk versus reward in expanding the definition. He understands maintaining the integrity of the profession and supports that, but would like to see things move forward to be progressive in supporting clients.
6. **Cat Gould:** Cat is a graduate student at Eastern Oregon University's clinical mental health counseling program, as is her colleague, Leah Rapaport. They are both hoping to graduate in just seven terms. Cat first read a comment from Leah, who was unable to speak at the hearing: this change would make a substantive impact on Leah's life, financially and professionally. As a clinician at Deschutes County Community Mental Health, the ability to begin working as a licensee sooner means Leah is sooner able to support a greater number of clients. She is currently the only provider certified in a specific treatment modality for OCD, exposure response prevention, but may only work with OHP clients. The two-year duration requirement does not meet the common sense test, and punishes hard-working clinicians looking to save money. Cat's comment is that she is still supporting her daughter who is in college, and is facing a break in healthcare coverage for her family because she is unable to work full time. There has been pressure to graduate as soon as possible, and seven terms was manageable, but if the eight-term requirement is upheld, she will need to drop one course in her current term and take it in the summer. This delays her entry into the workforce, creating financial weight, adding to the national changes that reduce students' ability to borrow for graduate programs. The Board's proposed change will help those willing to do the hard work and complete the required coursework in a shorter amount of time. She appreciates the Board's consideration of the rule change, which would benefit herself and many members of her cohort.
7. **Deb Montgomery:** Deb is grateful and understands that qualifying people for licensure is an important task. She was told that the Oregon Board would not license her because she went to the Seattle School of Theology and Psychology, and she didn't believe it because the program was so rigorous. She has been a licensed therapist in Washington for 15 years, and lives in Tillamook County where there is a high need for counselors. She was asked by a local clinic to run some groups because it would serve more people who are struggling, but she must tell community members that the Oregon Board won't license her. Ironically, her work involves helping clients come out of a system that is so rigid about how it interprets things, and this can cause great harm, as is what is happening in our country right now. She feels frustrated and angry, and feels that it is absurd that her school doesn't qualify, that she can't take a course or do something. She feels that her school is high quality with amazing professors. She is frustrated that Mary Jane graduated two years before her but was licensed. She listened to a Board meeting and understands that members are caring people trying to do a good job, and appreciates the opportunity to speak during the hearing. She hopes the Board will reconsider.

8. **Anya Reeser:** Anya is a licensed mental health counselor in Washington State and the Chief Operations Officer at the Tillamook County Community Health Centers, which provides integrated services in Oregon's rural north coast. She would like to add a safety net lens to the conversation, as Oregon works to provide care to its most vulnerable populations through federally qualified health centers, community mental health providers, and other public behavioral health systems. Her area faces profound access challenges. She also holds a degree from the Seattle School of Theology and Psychology, which meets the federal definition of accreditation, but she is unable to pursue licensure in Oregon because the program was not regionally accredited, despite living and working here and consideration of her training and professional experience. Safety net providers across the country face behavioral health workforce shortages. Integrated care models rely on the ability to recruit and retain qualified clinicians. Anya believes that rules that rely on historical accreditation frameworks restrict the workforce pipeline without clearly enhancing public protection. Despite her extensive leadership and operational skills, she cannot provide clinical supervision, so her employer must contract externally for supervision services. She appreciates the Board's efforts to update the rules, but believes further changes are critical to sustaining access to behavioral health services for Oregon communities.
9. **Megan Martin:** Megan works as a professional counselor associate at Mindful Therapy Northwest, which serves Medicaid patients and experiences high demand. In particular, there is a shortage of male-identified therapists. Her partner, Dave Whitener, graduated from a program in Pennsylvania that became CACREP accredited about two months after he finished, and he is running into problems getting licensed in Oregon. He is a very hardworking, motivated, and passionate person who grew up lower SES, and could provide a lot of understanding working with lower income clients frustrated with systemic forces. This situation impacts their household financially because of his inability to get licensed. He has provided extensive information on his program, but it is frustrating that he does not understand what to do.

The hearing was adjourned at 9:33 a.m. The public comment period closed on Monday, December 22, 2025 at 5:00 p.m.