

From: [Christian Colton](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Public Comment in support of change in OAR 833-050-0131 and OAR 833-075-0020
Date: Wednesday, February 26, 2025 2:15:39 PM

You don't often get email from christian.colton@gmail.com. [Learn why this is important](#)

To the board, and fellow therapists and counselors,

My name is Christian Colton, LPC, and I am writing in support of the changes to OAR 833-050-0131 and OAR 833-075-0020. I have seen the impact on clients, associates in training, and our profession's reputation from unregistered individuals continuing to use fraudulent credentials. We need a more robust ability to deter and punish those who would seek to continue to take advantage of the trust we cultivate for our clients and amongst each other. While there are cases that may be due to misunderstanding, there is a line between negligence and intentional exploitation. I agree with the proposed rule change as it allows more distinction between the two, while still adding an additional deterrent and restitution for more severe cases of abuse.

Thank you,
Christian Colton, LPC,
Eugene, OR

From: [Amy Isler Gibson](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Public comment new rule
Date: Wednesday, February 26, 2025 12:45:00 PM

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Hello. If I understand right, you are proposing to change the rule that says if a person hasn't, for instance, paid to reup on time, you won't cancel their entire license.

This happened to me in 2022. After years of being licensed, I was that summer completing an mfa in art and doing my solo thesis show up at PNCA in Portland. By the time I got to pay my (first time late ever) they made me start my entire license over. Which I did, but I was so upset I actually went to Salem to talk to the Board, but the people there were not only unresponsive they were unfriendly and cold.

So now when I apply for jobs I have to explain that I have been licensed for years and years, though my current license shows only since 2022.

I would love to have this fixed!

That is my comment.

Thanks for listening.

Amy Isler Gibson
Current LPC license C7138
Former LPC license C1876

From: [Martha Shimeall](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Support
Date: Wednesday, February 26, 2025 8:22:17 PM

You don't often get email from martha.shimeall@gmail.com. [Learn why this is important](#)

I support proposed amendments!

Thankyou

From: [Jupiter Townley](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Comment on proposed rulemaking
Date: Wednesday, February 26, 2025 12:25:11 PM
Attachments: PermOAR_Notice_2-26-25.pdf

You don't often get email from jupiter@secondheartcounseling.com. [Learn why this is important](#)

Hello,

I wanted to respond to the proposed rule-making outlined in the forwarded email. I wanted to voice my support of this change as I believe minimum sanctions & punishments hamper the ability for a bureaucracy to be equitable & consider exceptional circumstances. Thank you for making this change.

Jupiter (Elliot) Townley, LPC, NCC

Pronouns: They/them

Second Heart Counseling

(503) 862-9565 | <https://www.secondheartcounseling.com> | Fax (503) 308-1825

Response Times: I am available for work-related responses Monday, Tuesday, and Wednesday, and sporadically on other days of the week. If you contact me Thursday - Sunday, please anticipate waiting until the following Monday to hear back from me!

Please Note - Email is not a secure method of communicating about private or personal health information. Any medical or mental health information should be communicated by phone, fax, or through the Client Portal. Email is best used for scheduling or general information only.

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The information contained in this email is legally privileged and confidential and intended only for the use of the person(s) addressed above. If the recipient(s) of this email is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this is strictly prohibited. If you have received this in error, please notify me immediately by telephone (503-862-9565) and delete the correspondence. Thank you.

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: OBLPCT Updates <oblpcenews@omls.oregon.gov>
Date: On Wednesday, February 26th, 2025 at 12:10 PM
Subject: [OBLPCTeNews] Notice- Proposed Board Rulemaking
To: OBLPCT Listserv (oblpcenews@omls.oregon.gov) <oblpcenews@omls.oregon.gov>

NOTICE: BOARD PROPOSED RULEMAKING, PUBLIC COMMENT OPEN

Please find attached a rulemaking notice document from the Board of Licensed Professional Counselors and Therapists.

Rule Caption: Repeals sanction schedule and adds incremental violation

provision for continued practice following license/registration lapse.

Rule Summary

- Amend OAR 833-050-0131: Removes the schedule that sets forth minimum disciplinary action the Board will take when a former registered associate allows their registration to lapse and continues to practice unregistered in violation of the law. Adds a provision that the Board may treat each 90-day increment of unlicensed practice (or any part thereof) as a separate violation for purposes of imposing a sanction.
- Amend OAR 833-075-0020: Removes the schedule that sets forth minimum disciplinary action the Board will take when a former licensee allows their license to lapse and continues to practice unlicensed in violation of the law. Adds a provision that the Board may treat each 90-day increment of unlicensed practice (or any part thereof) as a separate violation for purposes of imposing a sanction.

Need for the Rule(s)

The Board determined that the sanction schedule- which was adopted to encourage timely renewal and prevent licensees and registrants from practicing unlicensed following license or registration lapse- did not result in the intended deterrent effect and reduced the Board's flexibility to consider unusual circumstances or negotiate stipulations. The new proposed language supports the Board's original desire for consistency and transparency in sanctions that involve the same type of conduct while allowing greater flexibility to ensure equitable administration of discipline.

PUBLIC COMMENT

The agency requests public comment on whether other options should be considered for achieving the rule's substantive goals while reducing negative economic impact of the rule on business. Please email your comments to laree.stashek@mhra.oregon.gov or mail them to the Board's office at 3218 Pringle Road SE, Ste. 120, Salem, OR 97302. All comments must be received no later than 5:00 p.m. on March 26, 2025.

WEBSITE

The above documents, along with rule text, are available on the Board [Rulemaking Webpage](#).

You are receiving this email because you are either a licensee, applicant, registered associate, or an interested person who has requested to be on the Board's mailing list. **This listserv does not allow replies.**

Thank you,

BLPCT Staff

MENTAL HEALTH REGULATORY AGENCY

3218 Pringle Road SE, Suite 120 | Salem, OR 97302-6309

Data Classification: Level 1, Published