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**Council for Accreditation of Counseling and Related Educational Programs**

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500 Montgomery Street, Suite 350 • Alexandria, VA 22314 • (703) 535-5990 • [www.cacrep.org](http://www.cacrep.org)

August 20, 2025

Re: Comment on Proposed Rule Regarding Practice in Oregon

Dear LaRee Stashek:

The Council for Accreditation of Counseling and Related Educational Programs (CACREP) is writing to **support** the proposed amendments to OAR 833-130-0071.

CACREP is the leading national accrediting body for Professional Counselor preparation programs. We accredit programs in the specialized practice areas of Addiction Counseling, Career Counseling, Mental Health Counseling, Clinical Rehabilitation Counseling, College Counseling and Student Affairs, Marriage, Couple and Family Counseling, (MCFC) Rehabilitation Counseling, and School Counseling. Additionally, CACREP accredits doctoral programs in Counselor Education and Supervision for the preparation of counselor educators and advanced practitioners.

This proposed regulation protects patients by ensuring that all individuals receiving counseling or marriage and family therapy services in Oregon, whether in person or via telehealth, are covered under Oregon's licensing and oversight structure. The rule closes potential loopholes where out-of-state Counselors could provide services to Oregon residents without adhering to Oregon's professional standards. With telemental health growing so quickly, this will help ensure that care remains ethical and safe.

It also positions Oregon well to potentially enter the Counseling Compact. By clearly defining that practice occurs where the client is located, the regulation removes potential ambiguities in the rules. This balance supports flexibility for professionals while maintaining clear oversight for the state.

Thank you for your attention to this important matter and for your ongoing work in supporting Oregon's counseling profession. Please feel free to contact us if we can provide additional information about the training and standards upheld by CACREP-accredited programs.

For any further questions, please contact CACREP's President and CEO Dr. M. Sylvia Fernandez at [sfernandez@cacrep.org](mailto:sfernandez@cacrep.org).

Sincerely,

*M. Sylvia Fernandez, Ph.D.*

M. Sylvia Fernandez  
President & CEO

**From:** [Julie Lifeisgreat](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** 833-110-0071  
**Date:** Thursday, August 7, 2025 1:00:14 PM

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Hello,

I am looking for more information about this proposed rule. I do not understand the need for this rule. Can you please share with me how this will impact licensees and associates, so that I know how to address this, as a registered supervisor. Is this pertaining to our personal statement or am I misunderstanding something?

Kind regards,  
**Julie Merchant**

When we resist change, it's called suffering. But when we can completely let go and not struggle against it, when we can embrace the groundlessness of our situation and relax into it's dynamic quality, that's called enlightenment

~Pema Chodron~

**From:** [Che Walker](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** 833-110-0071 Question  
**Date:** Thursday, August 7, 2025 11:24:43 AM

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Hello,

This reads very strangely so please forgive the question.

Is this meant to regulate if a Licensed Professional Counselor from another State can or can't give themselves that title on their personal websites, social media, etc? For instance, as I live in Oregon, if I were not licensed in Oregon but an LPC from Connecticut, is this saying I couldn't have my licensed title on my website or other elements? Or is this supposed to say I can't falsely advertise myself as available in Oregon?

Wouldn't this be a lot easier to just assume our professionals will not practice in States they aren't licensed?

Thank you for the help in understanding what you have all written. It's very confusing.

Che Walker  
C2858