

From: [Kathleen Adams](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Re: OAR 833-130-0050
Date: Wednesday, July 23, 2025 4:40 PM

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Hi,

I'm writing to register my strong opposition to Amending OAR 833-130-0050. I am a clinical supervisor with more than 40 years of clinical experience, including 20 years teaching and mentoring MFT graduate students as a university professor.

On June 11, 2025, the Board filed a Notice of Proposed Rulemaking for the following rule amendment: Registered associate supervisor requirements. • Amend OAR 833-130-0050: Allows licensees that hold an accredited doctoral degree in Counselor Education and Supervision to qualify as Supervisor Candidates on the Supervisor Registry. Allows and specifies the criteria for supervision experience and supervision of supervision completed in other states to satisfy the requirements for Approved Supervisor registry placement.

My concerns:

- It isn't clear if "licensees" refers to associates.
- If this is inclusive of associates, it means that an individual with a doctorate degree, and the supervision course hours, can become a clinical supervisor candidate without first meeting the minimum clinical experience requirements for full state licensure.
- This is not only counter~intuitive, but can result in associates receiving clinical supervision from people with less experience than they will get in their first year.
 - Doctoral grads generally seek teaching positions at universities that will support 5 to 10 hours a week being devoted to getting those hours.

There is nothing that can be substituted for the clinical hours and clinical supervision required to move from associate to full licensee. A doctorate degree, even with a supervision course, is

NOT clinical. I am speaking as a well experienced university professor and administrator, who has mentored many new doctoral level faculty.

Most recently I created and launched the MFT grad program at Oregon Tech, now in its 9th year. While nowmretired from teaching, I maintain a small private practice seeing clients and providing clinical supervision.

Thank you.

Kathleen



Kathleen M Adams, PhD

She / Hers <https://pronouns.org/what-and-why>

Licensed Marriage and Family Therapist

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From: [garyborjesson](#)
To: [STASHEK LaRee * MHRA](#)
Subject: comment on proposed Amendment
Date: Thursday, June 12, 2025 3:55:24 PM

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- Amend OAR 833-130-0050: Allows licensees that hold an accredited doctoral degree in Counselor Education and Supervision to qualify as Supervisor Candidates on the Supervisor Registry. Allows and specifies the criteria for supervision experience and supervision of supervision completed in other states to satisfy the requirements for Approved Supervisor registry placement.

I strongly object to this proposed amendment. We have already reduced the requirements for licensure, another amendment I disagreed with. Let's not further erode the quality of counselors by reducing quality of supervision. I understand the need for more supervisors, but the solution is not to amend rules to provide for unqualified supervisors. Formal education is NO SUBSTITUTE for thousands of hours of experience practicing as a licensed counselor. A good supervisor has a quality of judgment that comes only with practical experience, not book learning.

I hope the board will reconsider this, and look for other ways to make being a supervisor more inviting and tenable among those whose experience and proven success actually qualifies them. I know many of my colleagues are discouraged from stepping up because of the pronounced exposure to complaints and litigious behavior. Perhaps the board can think creatively about ways to protect and encourage a culture of supervision.

Thanks for making room for comment.

Sincerely yours,
Gary Borjesson, PhD, LPC

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



Council for Accreditation of Counseling and Related Educational Programs

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

July 16, 2025

Re: Comment on Proposed Rule Regarding Supervisor Qualification Standards

To Whom It May Concern:

The Council for Accreditation of Counseling and Related Educational Programs (CACREP) is writing to **support** the proposed amendments to OAR 833-130-0050, -0070.

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.

We appreciate the Board's efforts to expand the pool of qualified supervisors while maintaining high standards of training and consumer protection. In particular, we are pleased to see recognition of the advanced doctoral training and experience held by licensees who have graduated from counselor education and supervision doctoral programs.

Furthermore, supervision is a core component of our doctoral standards. Doctoral programs accredited by CACREP require rigorous coursework in clinical supervision theory and practice, alongside significant supervised experience conducting supervision with master's-level counselors-in-training. Graduates of these programs are therefore not only educated in supervision models and ethics but also have direct, supervised experience providing supervision prior to graduation.

We believe that allowing individuals who hold a doctoral degree from an accredited counselor education and supervision program to qualify for the Oregon supervisor registry prior to two years of independent licensure aligns well with both workforce needs and the public interest. It would remove unnecessary barriers while ensuring that supervisors possess the specialized knowledge and competencies essential for effective clinical supervision.

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.

Sincerely,

M. Sylvia Fernandez, Ph.D.

M. Sylvia Fernandez
President & CEO

From: [Andrea Hopkins](#)
To: [STASHEK LaRee * MHRA](#)
Subject: Supervisor registry comment
Date: Wednesday, June 11, 2025 2:26:44 PM

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I would like to propose that those who are dual credentialed and have been supervising in their other license field should be able to be added to the registry without the requirements as currently written. Example, I am an LPC and LCSW, I have been supervising CSWA's for the last at least 5 years but have not gotten any visibility for counseling associates because I am not on the registry. I have attended 30+ hours of supervision CEU's. I don't have time to get 2 years of supervision for supervising associates as I am already doing the work as a supervisor for social workers.

From: Tony Lai <reflectioncc@gmail.com>

Sent: Friday, June 13, 2025 12:48 PM

To: STASHEK LaRee * MHRA <laree.stashek@mhra.oregon.gov>

Subject: Comment for proposed rules

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Hi LaRee!

This is Tony Lai, former board member. Hope you are doing well and summer is off to a good start.

I just want to say thank you for the latest round of proposed rules and I am in full support of the proposed rules.

On a side note, I am currently part of a HB 2235 workgroup (through OHA) that is working on another round of legislative recommendations to help recruit and retain the behavioral workforce in community mental health settings. It appears our work does align with some of the proposed and adopted rules that the board has made or considering. I am wondering if you could forward my email and number to board members on the Education / DEI committee? I love to collaborate and share information so that we can draft realistic recommendations and also not be redundant if the changes are already being considered or made.

Thank you so much for your help,
Tony Lai

971-237-5931

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Check my availability and book a meeting with me at vyte.in/TonyLai

<https://www.linkedin.com/in/tonylaiplaytherapist/>

From: [Brian Smith](#)
To: [STASHEK LaRee * MHRA](#)
Cc: [Brian Smith](#)
Subject: Approved Supervisor - Amend 833-130-0050
Date: Saturday, July 19, 2025 3:40:07 PM

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Hello Ms. Stashek;

My name is Brian Smith and I am a Registered Associate in the state of Oregon. As a registered associate who is returning to the classroom to complete my Ph.D. in Counselor Education and Supervision (CES), I approve of the overall suggested changes and believe they will help to abate the discrepancies in the number of viable candidates to supervise Graduate Level Interns and Registered Associates. Although which components in the qualification section are a bit confusing as to whether items are "AND" or "OR" components, I believe the premise is sound.

In the process of finalizing these changes, might I suggest that the qualifications for those who hold a Ph.D. be laid out as follows:

1. Licensed in the State of Oregon.
2. Presentation of Ph.D. and/or Ph.D. transcript from an accredited CACREP college or university related to or encompassing supervision. The requirements for all CACREP Ph.D. courses are basically the same. Specifying specific components extracted from the CACREP mandates for CES (Counselor Education and Supervision) programs makes the process arduous. One example would be an hours mandate as CACREP programs for CES already have training hours built in.
3. Pass the Board's law and rules exam.
4. All applications be made retroactive to the date of filing.

If you have any other comments or need additional clarity on my thoughts in this area, please feel free to reply to this email or utilize my contact information below.

Regards - Brian Smith MABS, MACMHC, NCC
Registered Associate (State of Oregon)

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Brian Smith (he/him) Intern and LPC candidate

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[Client Portal](#) / www.sunnyskycounseling.com

All US Territories 24/7 Mental Health Support: Call 988 or text “HOME” to 741741 for text mental health support

Multnomah Mental Health Support Line, 24/7: Call 503-988-4888

Project Respond, Multnomah Mobile Crisis Services: Call 503-988-4888

Cascadia Mental Health Urgent Walk-in Clinic, no cost: 4212 SE Division St, Portland,
Open daily, 7am-10:30pm

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