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Memorandum

To: Behavioral health providers

From: Dr. Sejal Hathi, Oregon Health Authority (OHA) Director
Ebony Clarke, Behavioral Health Division Director
Emma Sandoe, Medicaid Director

Date: June 10, 2026

Subject: Rulemaking for Board-Registered Behavioral Health Associates

On April 13, 2026, OHA held a Rules Advisory Committee (RAC) meeting related to the requirement for board-registered behavioral health associates to work for a Certificate of Approval (COA) holding agency to bill Medicaid, which is being proposed for Oregon Administrative Rules (OAR) 410-172-0660, 309-019-0124 and 309-019-0130. OHA also held a public hearing on May 19, 2026, about these rule changes.

OHA has evaluated public feedback it received about this matter. OHA has also taken into consideration that there has been an unprecedented number of outpatient COA applications since this policy decision was announced in January 2025. As a result, OHA is updating the effective date of the proposed rule.

OHA will file permanent rules July 1, 2026. While most of the discussed rule changes will go into effect that same day, the rule change that is specific to board-registered behavioral health associates and Medicaid billing policy will become effective July 1, 2027. This means board-registered associates must work for a COA-

holding agency to bill Medicaid for services beginning July 1, 2027. All other OAR changes will become effective July 1, 2026.

OHA continues to accept and consider feedback, which can be emailed to medicaid.rules@oha.oregon.gov. The last day and time to submit public comment is 5 p.m. Pacific Time on June 18.

Questions?

If you have questions or feedback about this proposed rule, please email Feedback@odhsoha.oregon.gov.

If you are a provider interested in obtaining a COA, please send request to LCApplications@oha.oregon.gov.