Other formats and languages
You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact External Relations at oha.externalrelations@oha.oregon.gov or 503-947-2340 (voice/text). We accept all relay calls.

Frequently Asked Questions: Medicaid Rule Changes for Board-Registered Behavioral Health Associates

Updated: July 2, 2026

What is changing?

On July 1, 2026, Oregon Health Authority (OHA) implemented a rule change to clarify which types of unlicensed behavioral health providers must be physically located in Oregon while working for an agency with an OHA-issued Certificate of Approval (COA). As noted in this rule change:

- Board-registered behavioral health associates, peer support specialists, qualified mental health associates, qualified mental health professionals, certified alcohol and drug counselors, and problem gambling addition specialists are all considered unlicensed behavioral health providers.
- OHA has always required these professionals to be physically located in Oregon while working for a COA-holding agency.
- OHA is making this rule change to further clarify this point. This is reflected in the changes to Oregon Administrative Rules (OAR) 309-019-0125 and 309-019-0130.

One year later, on July 1, 2027, board-registered behavioral health associates must also either become licensed or work for an agency that has an OHA-issued COA in order to serve Medicaid members.

- This will end the current policy, which has allowed behavioral health associates to bill Medicaid while working in private practice and in settings that do not have a COA.
- This will be reflected in changes made to OAR 410-172-0660.

Why are these changes needed?

OHA is making these changes to ensure Medicaid members with the most complex behavioral health conditions can receive the care they need and deserve.

The rule changes will:

- Help community mental health programs, which serve a large volume of OHP members with complex behavioral health conditions, have the workforce needed to serve their clients.
- Ensure unlicensed behavioral health professionals receive the consistent training and experience needed to serve all OHP members – and particularly members with more complex conditions.

What is a Certificate of Approval (COA) for outpatient treatment?

Per Oregon Administrative Rule (OAR) 309-108, a COA allows outpatient behavioral health providers to employ and utilize unlicensed staff like qualified mental health professionals (QMHP), qualified mental health associates (QMHA), certified alcohol and drug counselors (CADC), certified recovery mentors (CRM), peer wellness specialists (PWS), peer support specialists (PSS), and family support specialists.

The process of certification ensures outpatient treatment programs meet minimum requirements by completing a screening, application, and compliance process that includes, but is not limited to assessment of the following:

- Program overview
- Organizational structure and staff qualifications
- Policy and procedure review
- Personnel records review
- Chart review
- Facility inspection
- Building and fire codes
- Liability insurance

COAs are granted to agencies. COA requirements are separate from the licensing or credentialing requirements that individual providers must obtain to work in Oregon.

What are board-registered behavioral health associates?

Board-registered behavioral health associates are behavioral health professionals who have earned a master's degree and are registered with a state professional board, but aren't licensed in their respective field.

Behavioral health associates provide treatment services and receive clinical supervision from a licensed, more experienced health care professional.

To work toward becoming licensed, behavioral health associates must be supervised by clinical supervisors who are registered and approved by a state professional board. These supervisors are officially known as board-registered clinical supervisors.

OHA is focusing on three types of associates for these rule changes: clinical social work associates; board-registered marriage and family therapist associates; and board-registered professional counselor associates.

How long does Certificate of Approval (COA) application processing take?

Unprecedented increased interest in COAs means OHA needs more time than usual to review and approve applications. OHA is processing COA applications as quickly as possible.

OHA is providing more time for everyone to prepare for this policy change. While the rule changes were finalized July 1, 2026, the COA requirement's effective date will be one year later. Starting July 1, 2027, board-registered associates will be required to work for a COA-holding agency in order to care for Medicaid members.

If you are a provider interested in obtaining a COA, please email LCApplications@oha.oregon.gov to be guided through the process.

Which providers and care settings are exempt from OAR 410-172-0660 rule changes?

While behavioral health associates will be required to work for a COA-holding agency in order to bill Medicaid starting July 1, 2027, the following provider types and care settings will be exempt:

- **Psychology interns**
    - Psychology interns often conduct administrative examinations to help determine which benefits clients can receive and to help manage

patient cases. Administrative examinations are different from directly providing behavioral healthcare.

- **Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs) and Tribal Health Clinics (THCs)**
  - These types of clinics already follow federal regulations that ensure staff are properly supervised and clients receive appropriate health care.
- **School-based health centers**
  - The new policy will not apply to clinics that operate on school grounds because another pre-existing certification process ensures these safety net clinics are providing appropriate care for patients and training for staff.
  - To receive OHA funding, school-based health centers must already be certified by OHA's School-Based Health Center State Program Office. This type of certification's requirements include clinical oversight and ongoing staff training.
- **Hospital-based primary care homes practicing integrated behavioral health**

Can coordinated care organizations (CCOs) choose to implement OAR 410-172-0660 rule changes before OHA's statewide rule change goes into effect?

Oregon's Medicaid State Plan provides CCOs with some flexibility to determine how they connect their members with timely, quality and equitable health care. This flexibility means individual CCOs can make this policy change for their enrolled members.

Can CCOs choose to allow board-registered behavioral health associates in private practice to see Oregon Health Plan (OHP) members?

When Oregon Administrative Rules (OAR) 410-172-0660 rule changes go into effect statewide on July 1, 2027, only behavioral health associates who work at a COA-holding agency will be able to care for OHP members, regardless of a member's assigned CCO.

Are health care professionals required to be physically located in Oregon while caring for people in Oregon?

Yes. Providers have always been required to be physically located in Oregon while caring for people in Oregon.

On July 1, 2026, OHA implemented a rule change to clarify which types of unlicensed behavioral health providers are required to physically be present in Oregon while working for an agency with an OHA-issued Certificate of Approval (COA). As noted in this rule change, board-registered behavioral health associates, peer support specialists, qualified mental health associates, qualified mental health professionals, certified alcohol and drug counselors, and problem gambling addition specialists are all considered unlicensed behavioral health providers. This will be reflected in changes made to Oregon Administrative Rules (OAR) 309-019-0125 and 309-019-0130.

Can behavioral health associates be physically located outside of Oregon while billing Medicaid and working for an agency with an OHA-issued Certificate of Approval (COA)?

No. Providers have always been required to be physically located in Oregon while caring for people in Oregon.

On July 1, 2026, OHA implemented a rule change to clarify which types of unlicensed behavioral health providers are required to physically be present in Oregon while working for an agency with an OHA-issued Certificate of Approval (COA). As noted in this rule change, board-registered behavioral health associates, peer support specialists, qualified mental health associates, qualified mental health professionals, certified alcohol and drug counselors, and problem gambling addition specialists are all considered unlicensed behavioral health providers. This will be reflected in changes made to Oregon Administrative Rules (OAR) 309-019-0125 and 309-019-0130.

Medicaid Division
Policy and Fee-for-Service Operations
500 Summer St NE, E35
Salem, OR 97301
Oregon.gov/OHA