

Oregon Psilocybin Services

2025 Public Listening Sessions

Summary with Questions and Answers

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Background

Oregon Psilocybin Services (OPS) held two virtual public listening sessions on June 3 and June 5, 2025. The listening sessions were 90 minutes in length and open to the public. Spanish and American Sign Language (ASL) interpretation were provided, as well as CART captioning. The sessions were recorded and can be found on our [2025 Public Listening Sessions](#) webpage in English, Spanish, and American Sign Language (ASL).

OPS does not answer questions during public listening sessions. Instead, the purpose of the listening sessions are to provide an opportunity for members of the public to provide feedback on the ongoing administration of the Oregon Psilocybin Services Act ([ORS 475A](#)).

The OPS team compiled themes and questions asked across the two listening sessions. This document summarizes themes heard and provides answers to the questions asked.

Input from the public listening sessions will continue to inform program development within the statutory container of ORS 475A, educational materials, and future community engagement.

Definitions

OHA = Oregon Health Authority, the state agency that licenses and regulates psilocybin services in Oregon under ORS 475A.

OPS = Oregon Psilocybin Services, the section within OHA's Public Health Division that administers psilocybin licensure and regulation.

Statute = A statute is a law adopted via ballot measure or passed by the Oregon Legislature and signed by the Governor. The Oregon Psilocybin Services Act was passed in November 2020 by Oregon voters as Ballot Measure 109 and is now codified in Oregon Revised Statutes, Chapter 475A ([ORS 475A](#)). OPS does not have the authority to amend statute. Making any changes to a statute requires passage of legislation by the Oregon Legislative Assembly and signing into law by the governor.

Rule = Administrative rules are adopted by agencies to implement statute. OPS is required to adopt administrative rules to administer ORS 475A within the statutory directives. Every Oregon Administrative Rule (OAR) uses the same numbering sequence of a three-digit chapter number, followed by a three-digit division number and a four-digit rule number. All psilocybin rules are in Chapter 333, division 333: [OAR 333-333](#).

Rulemaking = The OPS rulemaking process is informed by recommendations from the Oregon Psilocybin Advisory Board (OPAB), information from complaints, investigations, product tracking, and auditing by OPS, input from Rules Advisory Committees (RACs), and comments received during public comment periods. For more information, please see the [OPS Administrative Rules webpage](#).

Public Comment Themes

OPS received multiple comments during the 2025 Public Listening Sessions on the key themes listed below.

Concerns related to OPS budget and OPS license fees

Many participants voiced concerns about the sustainability of the OPS budget. Many spoke to the possibility of increased licensing fees, which may result in licensees exiting the regulated space.

Oregon Psilocybin Services is a fee-based section, which means that the license fees must cover the costs of administering the work. The cost of compliance is required by law and only one factor that contributes to the overall costs of operating a psilocybin business. OPS strives to balance administrative flexibility with the statutory requirement in ORS 475A to protect public health and safety as directed by ORS 475A

Safety and effectiveness have been demonstrated

Many commentors referenced the infrequency of reports to emergency services or shared first-hand experiences, when talking about the public safety and effectiveness of psilocybin services. Commentors expressed concern that some rules intended for public safety may be excessive.

OPS weighs many diverse priorities and viewpoints received throughout the rulemaking process while considering equity, public health and safety, and statutory authority under the Oregon Psilocybin Services Act. The regulated market for psilocybin services is still evolving, and OPS rules create a client-centered model that emphasizes client and public safety.

Concerns related to affordability and cost of services

Many commentors were concerned about cost being a barrier for people to access services.

Oregon Psilocybin Services does not have the authority to regulate the costs of psilocybin products or services.

Low-dose administration session requirements

Many comments were related to low dose sessions (< .25 mg psilocybin analyte). Some said that a low dose is sub-perceptual and should be treated differently in the rules. Some requested even lower minimum duration requirements for low dose sessions. Some requested that certain client forms no longer be required for every low dose session. Some proposed removing the requirement that preparation paperwork be completed 24 hours in advance of a low dose administration session.

Low dose administration sessions are not described in ORS 475A; however, OPS has made efforts to accommodate these sessions in administrative rules that are consistent with statute and client and public safety. In response to public feedback, the adopted 2024 rules shortened the minimum duration of these sessions to 30 minutes for the first session and 15 minutes for subsequent sessions. The Oregon Health Authority has determined that a transportation plan is required to protect public health and safety and to comply with intersecting laws, regardless of the dose consumed.

Some proposed expanding access to low-doses through a retail model similar to cannabis. It is important to understand that this is currently not allowable by law and would require a change in statute.

Maximum dose set in rule

We received some comments regarding the maximum dose allowable, currently set at 50 mg of psilocybin analyte. Some said that certain clients may require a higher dose for effectiveness, others felt that the current maximum dose was appropriate, while others expressed concern about clients potentially receiving too high of a dose.

As stated in the OPS Informed Consent document, the risks and benefits of consuming higher doses of psilocybin analyte are still not fully understood. OPS rules on maximum doses are designed to protect client and public safety and to provide flexibility for those clients who may require a higher dose.

Concerns related to required data collection

Several commenters referenced Senate Bill 303 (SB 303) and expressed concern with the required data collection.

Collection of data pursuant to SB 303 is required by statute. OHA provided testimony during the 2023 Legislative Session regarding concerns about SB 303, which can be reviewed [here](#). OHA also requested funds to support implementation, but additional funds were not included. OPS understands client confidentiality concerns and included a client opt-out option on the 303 Client Data form. OPS is aware of data limitations and includes a section on data limitations for each of the data pages within the OPS Data Dashboard.

Administration session minimum duration requirements

We received comments regarding minimum duration requirements for administration sessions.

Minimum durations specified in rule are designed to protect client health and safety. An administration session cannot end before the minimum time required for the dose that was consumed. After the dose-dependent minimum period elapses, OPS rules require facilitators to consult with clients and determine whether the administration session should be concluded. Licensed facilitators rely on their training and expertise, in addition to input from clients, in making this determination.

Alternative use of a service center's licensed premises

OPS received comments requesting that rules be changed to allow for more flexibility regarding the use of a service center's licensed premises. Some commentors would like the rules to be expanded to allow service centers to serve alcohol and some would like minors, persons under 21 years of age, to be allowed on the licensed premises.

Current rules provide flexibility for the temporary use of facilities for activities that are unrelated to the licensed privileges. ORS 475A.495 prohibits persons under 21 years of age from entering licensed premises and service centers are not licensed to sell alcoholic beverages.

House Bill 2387 and dual licensure

A few commentors referenced HB 2387, signed by the Governor on May 22, 2025, and voiced support for practitioners licensed under other Oregon boards to also serve as psilocybin facilitators.

HB 2387 is now signed into law, which means that OPS will be required to implement. OPS will address implementation issues around HB2387 in 2025 rulemaking, which may include feedback from the boards cited in the bill.

Need for more public education

OPS received a few comments regarding the need for more public education. Reasons were related to public safety and also for generating more demand for services to support the industry.

If you have ideas for how the Oregon Psilocybin Services section can continue to expand outreach and education about Oregon Psilocybin Services, please email: OHA.Psilocybin@oha.oregon.gov. Although ORS 475A does not include public education requirements, OPS works to provide information to the public through meetings, presentations, and other opportunities.

Other comments

We received comments on several other topics and issues that did not rise to the level of a “theme”. These include comments related to:

- **Secondary dose requirements**

Some commenters expressed views on regulations related to secondary doses of psilocybin products.

Under OPS rules, service centers may provide multiple secondary doses to clients as long as the total amount consumed is less than 50 mg of psilocybin analyte, and they are compliant with all other rules. All psilocybin products must be transferred to the client prior to beginning their administration session. ORS 475A.504 requires that service centers may not sell, give or otherwise make available a psilocybin product to a person who is visibly intoxicated and OPS rules on secondary doses are consistent with this requirement. For

more information about storage and retrieval of secondary doses, please see the [OPS Guidance on Administrative Rules](#).

- **Religious organization protections**

Some commenters raised issues related to religious organizations.

OPS is a state regulatory model. The Federal Religious Freedom Restoration Act (RFRA) does not compel OHA to treat applications from religious or entheogenic organizations differently from other applications. Making less restrictive standards for religious/entheogenic practitioners would likely violate the establishment clause protections of the Oregon and United States constitution. Applying fewer restrictions on religious/entheogenic practitioners would likely be viewed as granting a privilege to religion that is not available on a secular basis. For more information, you can review the [Legal Memorandum on the subject of Licensure and regulatory requirements for religious/entheogenic psilocybin practitioners](#) provided by the Oregon Department of Justice on May 25, 2022.

- **The provision that allows local jurisdictions to ban psilocybin businesses**

Some commentors expressed views about the provision that allows local jurisdictions to ban psilocybin businesses.

ORS 475A allows the governing body of a city or county to adopt ordinances that prohibit psilocybin establishments. Cities and counties may also repeal ordinances. (475A.530) Legislative action would be required in order to change this provision. For more information, please go to the [OPS Local Government Information webpage](#).

- **Facilitators should be required to have personal experience with psilocybin**

Some commenters shared that facilitators should have personal experience with psilocybin. Under OPS rules this is not required; however, OPS rules allow for students to participate in psilocybin

services as part of their practicum training experience, as long as they are treated as clients.

Facilitators must complete all required training, including practicum requirements. Training includes placement at a licensed service center where students can observe psilocybin services under the supervision of a practicum site supervisor. Training programs provide students with a minimum of 40 hours of practicum training, with up to four hours of credit for participating in an administration session at a practicum site as a client. For more, please see [Psilocybin Facilitator Practicum Requirements](#) in rules.

- **Advertising requirements should be reduced to promote travel tourism**

While some commenters suggested lifting advertising restrictions, specific requirements were not referenced.

OPS has adopted rules that specify advertising requirements for licensees which are summarized in the Advertising Requirements section of the [OPS Guidance on Administrative Rules](#) document. Advertising in television, radio, billboard, print media or internet is allowed as long as no more than 30 percent of the audience is under 21 years of age. Companies that sell advertising are usually able to provide demographic information on the target audience. Although OPS enforces administrative rules on advertising, other states may have laws that restrict psilocybin related advertising. Also, OPS does not have control over content policies of social media platforms or other media and advertising companies.

- **Facilitators with certain identities need financial assistance to serve their communities**

Commenter expressed the need for financial assistance to effectively serve certain communities.

Because ORS 475A creates a fee-based structure, licensing fees must cover the costs of the administration of OPS. Affordability is a concern for both licensees and clients; however, no other funding

exists to subsidize these costs. Under OPS rules, licensee applicants who are veterans, receiving Supplemental Security Income, receiving food stamp benefits, or are enrolled in the Oregon Health Plan may qualify for 50% reduction in their annual licensure fee. There are also some non-governmental organizations offering financial assistance to students pursuing facilitator training and to clients interested in accessing psilocybin services. All OPS licensees are required to create and follow Social Equity Plans. Some of these plans include sliding scale prices or other options to support access and affordability.

Questions and Answers

What is the budget shortfall?

Oregon Psilocybin Services is a fee-based section, which means that the license fees must cover the costs of administering the work. The cost of compliance is required by law and only one factor that contributes to the overall costs of operating a psilocybin business. OPS strives to balance administrative flexibility with the statutory requirement in ORS 475A to protect public health and safety as directed by ORS 475A

Here is some background information about the OPS budget:

2021-23 Biennium

OPS received General Fund (GF) for start-up costs and staff positions for the 2021-23 biennium to begin implementation of ORS 475A. OPS had an excess of unspent GF from 2021-23 of \$3,092,885 that was unable to be carried over or to be invested back into the section.

Budget considerations:

- OPS was established during COVID response. OHA's Public Health Division (PHD) has experienced significant infrastructure challenges, including delays in hiring, which created challenges for OPS in hiring its section during the 2021-23 biennium.

Cost containment strategies for the 2021-23 biennium included:

- Moved background checks to Oregon Background Check Unit (BCU) which reduced workload and overall costs of implementation
- Moved fee payment receipting to Office of Financial Services (OFS) which reduced workload and overall costs of implementation
- Developed training program, licensing, compliance, and product tracking into a single, cloud-based system. The Training Program, Licensing, and Compliance (TLC) system, developed in partnership with OIS, reduced costs associated with vendor contracts and created efficiencies in licensing and compliance program work, including for licensing, compliance, product tracking, and data reporting
- Organized section into hybrid model with drop in cubes at the office to reduce overhead and operational costs while establishing secure office space

2023-25 Biennium

OPS received \$3,139,672 General Fund (GF) and \$4,115,500 Other Fund (OF) limitation in the 23-25 biennium for a total of \$7,255,172. Despite cost increases, including SB 303 (2023) implementation, Cost of Living Adjustment (COLA) increases, internal cost allocation increases, and increased legal fees, OPS decreased its expenses for 2023-25 by over \$600,000.

Current OPS operating costs are based upon the program meeting **minimum legal requirements** of regulating psilocybin according to statute. Absent a significant increase in licensees, sustainability of the program continuing to meet statutory requirements would be dependent on other revenue streams, such as GF, or additional solutions, such as creation of new revenue streams.

Cost containment strategies for the 2023-25 biennium included:

- OPS reduced positions from 23 FTE to 17 FTE, which is the minimal number of positions required to administer ORS 475A.

Revenue-generating strategies for the 2023-25 biennium included:

- Increasing Training Program and Worker Permit Fees. OPS made the following changes to fees, which were adopted in administrative rules in November of 2024 and effective January 1, 2025:

- Changed 5-year worker permits (\$25 for 5-year approval) to annual worker permits (\$25 for annual approval).
- Changed 5-year training program curriculum approval (\$500 application fee for 5-year approval) to annual curriculum approval (\$500 for annual curriculum approval).

Licensing fees have not covered the costs of administering the minimal requirements of ORS 475 for several reasons:

- The regulated psilocybin industry is still growing in Oregon, and licensure takes time and resources for applicants.

- The slow growth of the industry is partly due to property challenges that applicants are experiencing due to local government ordinances that prohibit OPS from issuing licenses and restrictive zoning requirements for psilocybin businesses.
- Licensees face high costs related to insurance, banking, tax filing, and other constraints.

- **Unanticipated increases in costs** during the 2023-25 biennium included:

- The Oregon Legislature passed SB 303 in 2023 with no additional resources for the implementation of new data collection and reporting work added to ORS 475A. Implementation created significant costs for OPS, including: legal costs, development of the Training Program, Licensing, and Compliance (TLC) system for data collection and reporting, and hiring (1) RA3.
- Increased legal costs due to administrative hearings and DOJ time spent to address legal challenges.
- Cost of Living Adjustment (COLA) increases.
- Costs associated with Oregon Environmental Laboratory Accreditation Program (ORELAP) contract and compliance related work.
- Costs associated with Oregon Department of Agriculture (ODA) for third party validation testing for psilocybin products, including speciation, potency, microbials, pesticides, and heavy metals in accordance with statutory and rule requirements.
- Oregon Psilocybin Advisory Board Compensation will require more budget funds based on implementation of HB 2992 (2021), which increases compensation amounts for each meeting and will include

compensation for qualified non-governor appointed subcommittee members. New OPAB board members were appointed by the governor in March of 2025.

2025-27 Biennium

OHA Current Service Level (CSL) did not include support for OPS, and OHA did not approve a Policy Option Package (POP) for the 2025-27 biennium. OPS has projected a budget gap for the 2027-25 biennium. Current forecasting is based on limited information available as the OPS budget continues to shift. The 2023-25 biennium will close out on June 30, 2025, and once reconciled OPS will better understand the true costs of the biennium for future forecasting.

OPS understands that increasing licensing fees may be counterproductive, pricing out licensees and resulting in fewer licensees, significant decreases in revenue, and increased need for GF support. Current OPS operating costs are based upon the program meeting minimum legal requirements of regulating psilocybin according to statute.

Why is OPS collecting so much data?

Senate Bill 303 (SB 303) was passed by the Oregon Legislature in 2023 and is now codified in [ORS 475A.372](#) and [ORS 475A.374](#). SB 303 requires service centers to collect and report certain client and service center data. It also requires OPS to compile and publish specific service center, licensing, and compliance data.

For context, you can read the [testimony OPS submitted](#) during the 2023 Legislature for Senate Bill 303. In our feedback about the proposed bill, we suggest considering equity impacts of data collection and also suggest a dedicated funding source to support implementation.

OPS has published additional data on the OPS Data Dashboard to support public transparency and accountability, which are part of the Oregon Health Authority's Oregon Health Forward strategic plan.

OPS continues to prioritize data privacy and security. OPS follows data standards set by the Oregon Health Authority, including de-identification standards, before

publishing SB 303 data. For more information, please see the [OPS Data Privacy and Security Fact Sheet](#).

Will there be reciprocity for those who hold a Colorado Natural Medicine license? For instance, if someone is trained and licensed in Colorado, can they become a licensed facilitator in Oregon (even if their training program was not HECC-approved)?

No, there is no reciprocity under ORS 475A. To become a licensed facilitator in Oregon, a person must apply for a license and fulfill all Oregon licensing requirements. To learn more, please see the [OPS Facilitator License Fact Sheet](#).

Under Oregon law, individuals who plan to apply for facilitator licenses must complete a psilocybin facilitator training program that has curriculum approval by OPS and is licensed by the [Higher Education Coordinating Commission \(HECC\) if required](#).

OPS publishes the [List of Training Programs with Approved Curriculum](#) on the OPS website.

Can other wellness services like massage and other therapies take place at a service center?

Under [OAR 333-333-4300](#), a service center may authorize the temporary use of the licensed premises for activities that are unrelated to the exercise of license privileges, including wellness services. During the authorized temporary use, all rules remain in effect and a licensee representative must be present for the duration of the temporary use. A service center must provide advance written notice of the authorized temporary use to Oregon Psilocybin Services. Service centers may use a single written notice to provide advance notice of multiple and reoccurring events occurring within 90 days following the date of the notice. OPS has regulatory oversight over the licensed premises during the temporary use event and will investigate complaints.

Under [OAR 333-333-4300](#), a service center is prohibited from subletting any portion of the licensed premises. For more information, please review the [OPS](#)

[Guidance on Administrative Rules](#) under Requirements for Temporary Use of a Licensed Premises.

Can you share an update about HB 2387? What is dual licensure?

[House Bill 2387](#) (HB 2387) was recently passed in the 2025 legislature and signed by the Governor on May 22, 2025. HB 2387 contains a number of provisions related to psilocybin, including changes that affect facilitators who hold other types of professional licenses. The legislation identifies seven boards and grants specific protections and privileges for people licensed by those boards: (A) The Oregon Board of Licensed Professional Counselors and Therapists; (B) The Oregon Board of Naturopathic Medicine; (C) The Oregon Board of Psychology; (D) The Oregon Medical Board; (E) The Oregon State Board of Nursing; (F) The State Board of Licensed Social Workers; and (G) The State Board of Pharmacy. It allows psilocybin facilitators who hold a license from one of those boards to exercise the privileges of that license during integration and preparation sessions. It also prohibits those boards from disciplining their membership for lawfully providing psilocybin services as a licensed facilitator.

Although OPS is not a medical or clinical model, this provision creates opportunities for psilocybin services to be integrated into the healthcare system.

Thank you for your continued engagement

Thank you for participating in the 2025 OPS Public Listening Sessions, sharing your feedback and asking important questions.

Draft rules will be posted and discussed during the Rules Advisory Committee (RAC) meetings, scheduled to meet between July 14 and July 18, 2025. The next version of proposed rules will then be made available for public comment in September. The public comment period will be from September 1 to September 22, 2025. For more information, please go to the [OPS Administrative Rules](#) webpage.

We are always interested in learning from you. If you have any additional comments or questions, please contact the Oregon Psilocybin Services section at: OHA.psilocybin@oha.oregon.gov