

December 6, 2024

To Licensed Psilocybin Facilitators and Service Centers,

In November 2024, new and updated administrative rules were adopted and will go into effect on January 1, 2025. This letter describes some of the important changes related to service center and facilitator operations. For a complete description of new and updated rules, please read the [2024 OPS Rules with Tracked Changes](#).

New Term Limits for Worker Permits

The term for new worker permit applications and renewals has been changed from five years to one year. If approved, applicants will now pay the annual \$25 non-refundable permit fee for an annual worker permit. For worker permits approved prior to January 1, 2025, the permit will continue to have a term of five years from the date of initial approval. For all new or renewal permit applications approved on or after January 1, 2025, worker permits will have a term of one year from the date of initial approval.

Record Keeping and Client Confidentiality

The rules were amended to clarify requirements for storing client records and now specify that facilitators must transfer client records to a service center within 15 calendar days and inform the client of the service center where the records are being stored. As a reminder, no client records, nor copies of client records, may be stored at a location other than the service center where the client participates or intends to participate in an administration session. Storage at a service center includes storage on cloud-platforms that prevent unauthorized access and protect client confidentiality. If the service center where the client intends to participate in an administration session is unknown at the time a facilitator

creates the records, the facilitator must transfer these records to a service center that has agreed to receive them.

Service centers must create and retain a confidentiality plan that describes practices and procedures for storing and maintaining records on the licensed premises in a manner that prevents unauthorized access, protects client confidentiality, and prevents alteration of client records. This plan is not required to be submitted in every case but must be provided to OPS upon request.

A service center or facilitator may not disclose any information that may be used to identify a client, nor disclose any communication made by a client related to psilocybin services to any person including other clients, except with a client's written consent by using the [Notice and Opt-Out of Disclosure of De-identified Data](#) and [Authorization to Disclose Personal Identifiable Information](#) forms. Only the total number of clients who were provided psilocybin services can be publicly shared by a service center without receiving prior written consent using the data disclosure forms. Service centers are not required to complete consent forms when releasing a client's own records to a client who received services.

SB 303 Client Data

Beginning January 1, 2025, every client who will participate in an administration session is required to complete a [303 Client Data Form](#) in accordance with ORS 475A.372. Clients should receive this form prior to or during a preparation session.

Clients may choose not to have their data submitted to OPS. When a client checks the box on their 303 Client Data Form indicating that they do not want their responses submitted, service centers will exclude their responses from the client data compiled and reported to OPS. When clients opt out of submitting their responses, the service center is still responsible for storing the 303 Client Data Form in the client's file. Service Centers may not share data collected using the 303 Client Data Form with third parties regardless of client consent.

For more information about SB 303 implementation, please see the updated [Senate Bill 303 and Data Collection Information webpage](#) and the [303 Data Reporting Guide for Service Centers](#) that was sent to licensed service centers on November 22, 2024.

Selected Updates Related to Administration Sessions

Beginning January 1, 2025:

- An on-call backup facilitator is no longer required for administration sessions.
- Service centers are no longer required to provide clients with a list of licensee representatives who may be present during an administration session.
- Minimum Duration of Administration Sessions has been updated to allow clients who consume equal or greater to 10 mg but less than 15 mg a minimum duration of 3 hours. Clients who consume equal or greater than 15 mg and less than 25 mg of psilocybin analyte have a minimum duration of 4 hours.
- For clients consuming less than 2.5 mg of psilocybin analyte, the minimum duration of the administration session will now be 30 minutes for the client's initial administration session and 15 minutes when the client participates in any subsequent administration sessions at the same service center within a 12-month period.
- Existing rules require that every service center must create and maintain a service center Safety and Emergency Plan which documents procedures for clients who attempt to leave an administration session prior to the minimum duration for the session (specified in OAR 333-333-5250), however the updated rules specify that the plan does not need to require calling the clients' personal emergency contact.

Facilitation at Unlicensed Locations

Amended rules refine requirements for facilitation at service centers and duty to report misconduct. ORS 475A requires licensed facilitators to conduct psilocybin administration sessions at licensed psilocybin service centers without exception. The 2024 rules clarify this statutory requirement while also describing certain activities that do not apply, such as

harm reduction activities, work at locations outside of Oregon, or participation in research if they hold the necessary license or authorization or it is otherwise lawful to do so. The rules also expand licensees' duty to report misconduct to include violations involving psilocybin products or facilitator conduct.

Psilocybin Product Potency Update

OPS has published [Psilocybin Product Potency Information](#) and encourages service centers and facilitators to share this information with their clients. This information supports client decisions on selecting a product type and dose that aligns with their intentions for the administration session. The information can also be found on the [Access Psilocybin Services](#) webpage and was added to the Facilitator and Service Center License webpages.

Culturally and Linguistically Responsive Services Requirement

The purpose of this new requirement is to support clients and prospective clients in making informed decisions about choosing a service center and facilitator that meets their individual needs.

If requested by a client, service centers and facilitators must be able to provide information regarding any culturally or linguistically responsive services they offer to clients to support client safety and access to services. This may include translation and interpretation resources or referring clients to other facilitators or service centers if the licensee is not able to provide culturally and linguistically responsive services requested by a client.

Updated Social Equity Plan Requirement

Amended rules now require licensees to make their social equity plans and evaluation reports available to clients and perspective clients upon request.

Support Person Update

The rules now allow clients an option to request a client support person over 21 years of age to attend their administration session as an observer. Service centers and facilitators may choose to decline this request. Client support persons who attend administration

sessions as observers must comply with all of the requirements for client support persons described in the rules, including completing and signing a [Client Support Person Plan](#).

Like all client support persons, observers are required to meet with the client and facilitator prior to being present during an administration session. Client support persons are limited to touching clients by giving hugs or placing their hand on a client's hands, feet or shoulders with the client's prior written consent.

New Continuing Facilitator Education Requirement

For renewal applications received on or after January 1, 2026, facilitator licensees must have completed four hours of continuing education during their annual license period. To meet this requirement, facilitators must complete the continuing education hours before their renewal date. Continuing education must consist of skills and knowledge that are relevant to the core curriculum described in [OAR 333-333-3050](#) and [OAR 333-333-3060](#).

The continuing education must be provided by either:

- (a) Training programs with curricula approved by the Authority, or
- (b) Organizations or conferences that have been approved to offer continuing education for other types of professional licenses or certifications.

As part of their renewal application, licensed facilitators will need to be able to provide documentation that describes the education received, who provided the training, and number of hours completed. This can be achieved by submitting a certificate of completion or other documentation that provides proof of registration and attendance.

Changes in Practicum Site Requirements

Beginning January 1, 2026, all practicums must take place at a licensed service center in Oregon. Alternative practicum may not be used to satisfy practicum requirements after January 1, 2026.

Expanded practicum rules allow licensed service centers in Oregon to function as practicum sites not only for training programs approved in Oregon, but for any training program authorized to provide psilocybin training in the United States.

A training program may provide students up to four hours of credit towards the direct practice requirement for participating in an administration session at a practicum site as a client. Students who consume psilocybin during practicum are considered clients and licensees must comply with all rules when selling psilocybin products and providing psilocybin services to clients who are also students.

A 'Practicum Site Supervisor' is now defined as the onsite practicum supervisor of assigned trainees, who is affiliated with a training program practicum site or who is affiliated with a service center acting as a practicum site and who does not act as a facilitator while supervising students. If a practicum site supervisor is affiliated with a practicum site rather than affiliated with a training program, the service center must share the name of the practicum site supervisor with OPS, prior to students participating in practicum at the practicum site.

New and Updated Operational Forms

New and updated forms will need to be used beginning January 1, 2024. The new and updated forms will be published and available on the OPS website beginning December 31, 2024, and we will send another communication notifying you of these updates. If a client has completed forms during a preparation session prior to January 1, 2025, those forms will not need to be redone.

How to Surrender a License

A licensee may request to surrender a license by submitting a [License Surrender Request](#). Each individual person identified as a licensee must submit a separate request, including a product plan and client record plan if applicable. The license remains in effect until OPS accepts the surrender. OPS may request additional information and require additional site inspections prior to accepting the surrender.

OPS will review product plans and client record plans and may require revisions to plans prior to accepting a surrender request. If OPS accepts a surrender request, OPS will notify the licensee in writing of the date of acceptance. The licensee must cease all license privileges on this date through the remainder of the licensing period. The licensee must receive a new license before engaging in any licensed activities.

Thank you for your partnership in the continued administration of the nation's first regulatory framework for psilocybin services. We appreciate your partnership.

Sincerely,
The Oregon Psilocybin Services Section