

November 6, 2025

To Licensed Psilocybin Facilitators,

On October 24, 2025, new and updated administrative rules were adopted and will go into effect on January 1, 2026. This letter describes some of the important changes related to psilocybin facilitators. For a complete description of new and updated rules, please read the [2025 OPS Rules with Tracked Changes](#).

### **Dual Licensure**

[House Bill 2387](#) was passed by the Oregon Legislature in 2025 and grants specific protections and privileges for people licensed under seven specific boards:

- (A) Oregon Board of Licensed Professional Counselors and Therapists;
- (B) Oregon Board of Naturopathic Medicine;
- (C) Oregon Board of Psychology;
- (D) Oregon Medical Board;
- (E) Oregon State Board of Nursing;
- (F) State Board of Licensed Social Workers;
- (G) State Board of Pharmacy.

Beginning January 1, 2026, a facilitator licensed under ORS 475A.325 who is also licensed by one of these seven boards may provide health care services or behavioral health services to clients during preparation and integration sessions.

A facilitator who holds a license from one of the named boards will be required to notify OPS of their license status using TLC. After giving notice, a facilitator may provide additional health care or behavioral health care services during

preparation and integration sessions as long as the facilitator also notifies the client prior to providing services. The required Client Information Form and Psilocybin Product and End of Session Form will be updated to inform clients of these amended rules. Updated forms must be used by all licensees beginning January 1, 2026.

Facilitators who hold licenses issued by the boards identified in HB 2387 are encouraged to contact their licensing boards with any questions related to this new law. For more information, please see the [OPS Dual Licensure and HB2387 Fact Sheet](#).

### **303 Client Data Form Revisions - Veteran Status**

HB 2387 also amends ORS 475A to require the collection of 'veteran status' of clients. The 303 Client Data Form will be updated and will also include new categories in the racial and ethnic identity questions to reflect the REALD and SOGI Demographic Data Collection Standards (OAR 950-030- 000), developed through a rulemaking process led by the OHA Equity and Inclusion Division. The updated 303 Client Data Form must be used beginning January 1, 2026. For more information, you can [read a letter about 2026 Data Requirements](#) sent to Service Centers on September 4, 2025.

### **Facilitator Continuing Education Requirements**

OPS amended OAR 333-333-3300 to clarify requirements for psilocybin facilitators to receive and report qualifying continuing education hours. The rule states that qualifying trainings may be offered by psilocybin training programs or an organization or conference that has been approved to offer continuing education for other types of professional licenses or certification. Under the amended rule, facilitators who provide qualifying trainings on behalf of a training programs or other qualifying organization may report those hours to meet their own reporting obligation. After January 1, 2026, these hours may be reported using the updated form on the OPS facilitator webpage. OPS lacks resources to offer its own training and educational opportunities or preapprove offerings provided by outside organizations. By limiting which programs and

organizations may offer training the rule provides clarity to facilitators regarding which trainings will qualify for continuing education.

### **Individuals Present During Administration Sessions**

OPS streamlined requirements for client consent for certain individuals to be present during administration sessions at the request of licensees. OAR 333-333-5000 was amended to remove the requirement that clients provide prior written consent for licensee representatives to be present to assist with operations. OAR 333-333-5020 was also amended to remove the requirements to meet other clients who will participate in a group administration session prior to the session beginning.

### **Psilocin on Psilocybin Product Labels**

OPS made important changes to label rules to implement legislation and provide greater clarity to clients and facilitators about product potency. The Oregon Legislature amended ORS 475A to require psilocin content to be listed on psilocybin product labels, and OAR 333-333-2400 has been adjusted to reflect this requirement. OPS made additional changes to require product labels to display any other values regarding available, potential or equivalent psilocin or psilocybin that are identified by the laboratory who performed potency testing. Detailed information on compliance with revised label rules has been included in the attached Product Label and Potency Letter. We share this information with Facilitators to support conversations with clients regarding product selection and dosage.

### **Potency Information Document**

OPS amended OAR 333-333-5000 to require that facilitators discuss the [Psilocybin Product Potency Information Document](#) with clients during a preparation session. This document supports client decisions on selecting a product type and dose that aligns with their intentions for the administration session. Previously licensees were encouraged to provide this document to clients, but due to ongoing concerns about product potency safety the document is now required to be provided to clients.

### **Low Dose Administration Session Plans**

OAR 333-333-5200 was amended to address plans for low dose administration sessions. Under the revised rule, when clients intend to consume doses of less than 2.5 mg of psilocybin analyte on multiple days, they will work with Facilitators to create plans for a dosing schedule. This change is designed to ensure that clients are able to access their doses according to an agreed upon schedule.

### **Client Records**

OPS amended OAR 333-333-4820 to clarify that all client records must be incorporated promptly with other client records and stored at the service center. The records described in the amended rule are client records as defined in OAR 333-333-1010(20). Existing rules require these documents to be stored at the service center. The proposed amendment merely states that these records must be incorporated with other client records promptly. OPS is unable to address other record keeping requirements for dual licensed facilitators. OPS rules operate independently from any requirements imposed by other licensing bodies.

### **Other Changes**

OAR 333-333-4480 has been amended to require service centers to create and maintain a list of facilitators who have provided services at the licensed premises. This memorializes a practice that many service centers may already have in place, and it supports client safety and efficient investigations.

The Client Bill of Rights has been revised to remove a provision that was deleted from rule in 2024 (to receive prior notice of any service center licensee representatives who may be present in the client administration area to assist with operations).



OPS amended rules to enable efficient collection of unpaid civil penalties for administrative violations. Under the amended rules, failure to pay a civil penalty imposed by final order is a basis to deny applications for license and worker permit renewal.

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

Sincerely,  
The Oregon Psilocybin Services Section