

November 6, 2025

To Licensed Service Centers,

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 service center operations. 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. 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 will be sent in advance to licensees, along with an updated 303 Data Reporting Guide for Service Centers. 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.

Reporting of 303 Opt-outs

OPS amended OAR 333-333-4910 to require quarterly reporting of the number of clients who requested that their data be withheld from data submitted to OHA. This information will assist OHA to better understand the data that is received during service center’s quarterly reporting required by SB 303. The rule change is effective January 1, 2026, and service centers will begin reporting this data when the Q1 reporting portal opens on April 1, 2026. In order to comply with this reporting requirement service centers must begin collecting the data on January 1, 2026.

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

service centers to ensure that all product labels at service centers licensed premises are compliant with the amended rules on January 1, 2026.

Potency Information Document

OPS amended OAR 333-333-5000 to require that the [Psilocybin Product Potency Information Document](#) is discussed 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.

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.

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.

List of Facilitators

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.

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

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.

OAR 333-333-4200 has been amended to require prior approval when adding an individual or legal entity who qualifies as an applicant, and when changing the licensee's operational name.

OAR 333-333-4250 has been amended to remove reinspection periods and treat non-compliance discovered during a license renewal inspection identically to compliance issues discovered in other contexts.

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).

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

