

**From:** [Tracy Chisholm](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Proposed rules  
**Date:** Friday, March 20, 2026 2:49:23 PM

---

You don't often get email from dr.tburkhart@gmail.com. [Learn why this is important](#)

Hi,

This request is related to economic limitations caused by current board rules, but is not related to proposed amendments in the latest email (which I currently support).

I would appreciate the board to please reconsider participating in PsyPACT. OR is one of only 2 states that refuse to participate. This limits economic opportunity for OBOP members and disincentivizes getting licensed in OR. Several other psychologists have indicated an interest in PsyPact.

Also, our license renewal fees are outrageously high. I would appreciate the board taking a hard look at the reasons for this and consider fiscal conservation efforts to substantially reduce these costs. There is simple NO reason for it when other states are able to operate their psychology boards for significantly less.

PLEASE consider passing along these questions to the board for consideration. Thank you!

**From:** [Kurt Freeman](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Public Feedback on AMEND: 858-020-0045  
**Date:** Wednesday, April 1, 2026 9:45:44 AM  
**Attachments:** image001.png

---

You don't often get email from [freemaku@ohsu.edu](mailto:freemaku@ohsu.edu). [Learn why this is important](#)

I am writing to express my concern of the proposed change in Rule 858-020-0045 (2) from “the supervising psychologist(s) shall be notified” to “may be notified”. As the supervising psychologist responsible for the work of a resident, I am concerned that an investigation can be initiated of the resident I supervise without being notified. This places supervisors in a position of continuing to operate without full knowledge of alleged concerns. I strongly disagree with this proposed change.

Respectfully,



**Kurt A Freeman, PhD, ABPP** (he, his, him)\*  
*Director, Institute on Development and Disability*  
Fred Fax Endowed Professor of Pediatric Excellence  
Department of Pediatrics, OHSU  
707 SW Gaines Street  
Portland, OR 97239  
office 503 494-0360 | fax 503 494-6868

Executive Specialist  
Janet Tanney  
503 494-0102  
[tanney@ohsu.edu](mailto:tanney@ohsu.edu)

*~Together we: Imagine, Inspire, Engage, Excel~*

\* Note, these are individual views expressed and are not to be construed as representing the views of any organization with which I am affiliated

**From:** [Kurt Freeman](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Public Feedback on AMEND: 858-010-0036  
**Date:** Wednesday, April 1, 2026 9:52:56 AM  
**Attachments:** image001.png

---

You don't often get email from [freemaku@ohsu.edu](mailto:freemaku@ohsu.edu). [Learn why this is important](#)

I am writing to express my continued concern about the expectation that “The 12 months must include at **least 50 total weeks** (emphasis added) during which psychological services were performed in accordance with this rule.” While I appreciate the intent is to protect against high numbers of work occurring in a small number of months, I find this expectation overly prescriptive and burdensome. Shifting this to “at least 48 total weeks” would be beneficial.

Further, I strongly recommend the board include language specifying that, for a week to count toward the 50 total weeks (or 48 if changed), it can include any # of hours. As it stands, it is unclear if there is a threshold of hours that must be met in order for a week to count.

Respectfully,



**Kurt A Freeman, PhD, ABPP** (he, his, him)\*  
*Director, Institute on Development and Disability*  
Fred Fax Endowed Professor of Pediatric Excellence  
Department of Pediatrics, OHSU  
707 SW Gaines Street  
Portland, OR 97239  
office 503 494-0360 | fax 503 494-6868

[Executive Specialist](#)  
Janet Tanney  
503 494-0102  
[tanney@ohsu.edu](mailto:tanney@ohsu.edu)

*~Together we: Imagine, Inspire, Engage, Excel~*

\* Note, these are individual views expressed and are not to be construed as representing the views of any organization with which I am affiliated

**From:** [Marcy Hunt](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Comments on proposed rulemaking  
**Date:** Wednesday, April 22, 2026 4:57:57 PM

---

You don't often get email from mhun2@pdx.edu. [Learn why this is important](#)

We are writing to comment on the recent proposed rulemaking. We appreciate the efforts of the board to take a more active approach in residency situations in which there are competency concerns, and to change or eliminate burdens on applicants. In regards to the latter, we appreciate the thoughtfulness of eliminating the three exam threshold in favor of supportive measures that would better reflect values related to equity and access.

We were unsure of how to understand some of the proposed changes to the residency notice and investigation process (858-020-0045) and hoped that there would be further clarification prior to the implementation of the rules. In particular we wondered about the following:

1. Will this rule change apply to exempt sites?
  - a. If so, we are concerned about how board recommendations around residency competency considerations (858-020-0045 (9)) would intersect with employment contracts (e.g. a resident signs a 1-year employment contract with a site and Board, after investigation, extends residency by 3 months – what are the implications for the site? – especially since there are restrictions on position types and numbers in an organization (per HR), as well as potential financial limitations).

2. We are hesitant about the proposed shift to NOT automatically inform supervisors when the conduct of their supervisee may affect their license (858-020-0045 (2)). In instances of this kind, we support the existing practice of notification of supervisors at the same time that their resident is notified.

Thank you for your thoughtfulness in working to formulate updates so that the rules that govern the practice of psychology in Oregon can continue to protect both clients and those who practice the profession in this state. We appreciate your attention to these comments and look forward to any clarification that would help us better understand the implications of what is proposed.

Thank you,

Marcy Hunt, PhD  
Cheryl Forster, PsyD  
Jen Dahlin, PsyD  
Kyle Isaacson, PhD  
Vivien So, PhD  
Maya Williams, PhD

--

**Marcy C Hunt, PhD**  
Director, Counseling Services  
Center for Student Health and Counseling  
Portland State University  
Pronouns: she, her, hers  
503-725-2800  
<https://www.pdx.edu/health-counseling/>

*Because email is not a confidential medium, please be aware that confidentiality cannot be guaranteed.*

**From:** [Meghan Kelley, PsyD](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Feedback on Proposed Rule Making  
**Date:** Thursday, April 23, 2026 8:03:57 AM

---

You don't often get email from meghan@drmeghankelley.com. [Learn why this is important](#)

Hi Laree,

I just wanted to share my support for the changes noted for the OARs in the spring board newsletter. I appreciate that these changes give the board more flexibility in making their decision making and allows for less punitive penalties if appropriate.

Thank you,  
Meghan

Meghan Kelley, PsyD  
Pronouns: She/Her  
Inner Wellness, LLC  
3310 SE Division Street  
Portland, OR 97202  
(503) 729-4205 (p)  
(503) 893-3068 (f)  
[www.drmeghankelley.com](http://www.drmeghankelley.com)

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message, including attachments.

Sent with [Proton Mail](#) secure email.

**From:** [Eric Morrell](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** OBOP proposed rule changes  
**Date:** Friday, March 20, 2026 4:04:59 PM

---

You don't often get email from ericmorrell@gmail.com. [Learn why this is important](#)

I'm appreciative to the Board for the revisions. In general they appear to reflect an intent to be thoughtful and deliberative rather than reflexive and lock step.

Thank you

*Eric M. Morrell, Ph.D.  
Clinical Psychologist  
Certified Forensic Evaluator*

*724 Cardley Ave  
Medford OR 97504  
Work Phone (541) 770-2469  
Work Fax (541) 770-3253  
Work Cell (516) 515-1281*

**From:** [Kat Selah](#)  
**To:** [STASHEK LaRee \\* MHRA](#)  
**Subject:** Re: Comment on New OBOP updates regarding 50 week requirement  
**Date:** Saturday, March 21, 2026 10:28:34 AM

---

You don't often get email from [katbselah@gmail.com](mailto:katbselah@gmail.com). [Learn why this is important](#)

Hi LaRee,

Well, that's embarrassing! Sorry about that. Somehow it being formatted as an additive rule in the text, rather than in the context of the existing rule, drew attention to it in a way it hadn't before. I maintain what I said however, and would like my comment shared with the Board, albeit perhaps in a way that includes this comment as well. Licensed psychologists regularly take 4-6 weeks off in the summer to rejuvenate. Post-docs who have high levels of responsibilities with lower compensation deserve to also be able to take our PTO as we and our employers see fit (perhaps up to 4 weeks as that is the maximum we see offered, so hours within 48 rather than 50 weeks.) This rule also does not honor international or immigrant post-docs, for whom visiting their family may rely on taking longer trips, so this rule significantly impacts their access to visit and spend time with their families.

Thank you for your consideration,  
Kat Selah

On Fri, Mar 20, 2026 at 3:06 PM STASHEK LaRee \* MHRA  
<[laree.stashek@mhra.oregon.gov](mailto:laree.stashek@mhra.oregon.gov)> wrote:

Thank you for submitting a public comment on the proposed rulemaking. Your feedback is much appreciated. The Board will review all comments received at the May 8, 2026 meeting.

Also, for your knowledge, the 50 weeks has already been a requirement for many years. [Post-Doctoral Supervised Work Experience Policy](#)

### **LaRee Stashek**

Policy Advisor

MENTAL HEALTH REGULATORY AGENCY

3218 Pringle Road SE, Suite 130 | Salem, OR 97302-6309

[laree.stashek@mhra.oregon.gov](mailto:laree.stashek@mhra.oregon.gov)

Data Classification: Level 1, Published

---

**From:** Kat Selah <[katbselah@gmail.com](mailto:katbselah@gmail.com)>  
**Sent:** Friday, March 20, 2026 2:57 PM  
**To:** STASHEK LaRee \* MHRA <[laree.stashek@mhra.oregon.gov](mailto:laree.stashek@mhra.oregon.gov)>  
**Subject:** Comment on New OBOP updates regarding 50 week requirement

You don't often get email from [katbselah@gmail.com](mailto:katbselah@gmail.com). [Learn why this is important](#)

To the Oregon Board of Psychology,

I am writing as a current post-doctoral fellow to formally express my strong opposition to the proposed rule requiring that post-doctoral residents complete psychological services during at least 50 of their 12 months' required weeks.

This requirement fails to account for the unique and demanding context in which post-doctoral residents practice. Oregon residents are frequently assigned the most complex and high-acuity cases in the state, largely because many of us are restricted to serving Medicaid populations — patients who often present with severe, chronic, and co-occurring conditions. We carry these caseloads while functioning with a high degree of clinical independence, yet doing so for compensation that does not reflect that level of responsibility.

Paid Time Off is not a luxury in this context — it is a professional necessity. It is one of the few meaningful ways our organizations can offset the emotional and psychological toll of this work. Mandating that residents work 50 out of 52 weeks will not enhance the quality of psychological services in Oregon. What it will do is accelerate burnout, reduce the quality of care provided to already-vulnerable patients, and make Oregon post-doctoral positions less sustainable and less competitive nationally.

It is well-established in the psychological literature that clinician burnout directly compromises patient care. Requiring residents — who are already managing exceptionally demanding caseloads under supervision and for comparatively modest pay — to forgo meaningful rest periods runs counter to the very outcomes the Board presumably seeks to protect.

There is no clinical or ethical rationale that justifies requiring what amounts to requiring providers to provide patient care for the full year with only a two week break. The proposed rule appears to impose a significant burden on residents without any corresponding benefit to public safety or patient outcomes.

I respectfully urge the Board to reconsider this requirement and to preserve residents' right to take Paid Time Off as negotiated within their individual employment contracts. I would welcome the opportunity to provide additional input and am happy to participate in further discussion during the public comment period.

Thank you for your time and consideration.

--

Kat Selah, PhD ([they/them](#))

Psychologist Resident

917.951.1437

[katbselah@gmail.com](mailto:katbselah@gmail.com)

--

Dr. Kat Selah, PhD ([they/them](#))

917.951.1437

[katbselah@gmail.com](mailto:katbselah@gmail.com)