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BEFORE THE  
BOARD OF PSYCHOLOGY  
STATE OF OREGON

In the Matter of the Conduct of ) AGENCY NO: OBOP #2019-064  
)  
)  
NANCY BLUM ) DEFAULT ORDER  
RESPONDENT )

1.

The Board of Psychology (Board) is the state agency responsible for licensing and disciplining psychologists, and for regulating the practice of psychology in the State of Oregon. The Board is also responsible for enforcing the laws against the unlicensed practice of psychology in the State of Oregon. Nancy Blum (Respondent) is not licensed by the Board to practice psychology in the State of Oregon.

2.

On December 2, 2020, the Board sent to Respondent by regular and certified mail a Notice of Proposed Civil Penalty [Notice] to impose a civil penalty of \$5,000 against Respondent, pursuant to ORS 675.010(4), ORS 675.020(1)(a), (b), and (2); ORS 675.070(2)(h) and ORS 675.070(3)(b), for engaging in the unlicensed practice of psychology in Oregon by offering or rendering services included in the practice of psychology and representing herself to be a psychologist. The Notice informed Respondent that should she fail to submit a request for hearing within thirty (30) days or fail to appear at a scheduled hearing, the Board may issue a final order by default. Respondent did not respond to this Notice and did not request a hearing. As a result, Respondent has waived her right to a hearing and now stands in default. The Board elects in this case to designate the record of proceedings to date, which consists of Respondent's file with the Board as the record for purposes of proving a prima facie case, pursuant to ORS 183.417(4).

FINDINGS OF FACT

1  
2  
3 Respondent's acts and conduct that form the basis for the Board's action are described  
4 below:

5 3.1 Respondent, who is also known as (aka) Nancy Bloom, does not hold a license to  
6 practice as a mental health professional in Oregon. From 1973 to present, Respondent has  
7 worked as an ordained minister through the Church of the Gentle Brothers & Sisters, providing  
8 spiritual counseling and spiritual healing, along with officiating at weddings in Southern Oregon  
9 and Northern California. In 1983, Respondent received a Master's degree in psychology from  
10 Sonoma State University in California. From 1990 until 2014, Respondent worked at the  
11 Rosewood Institute, which was established in 1990 as an Oregon state certified mental health  
12 center. Individuals with a master's degree worked under the regular supervision of supervisors,  
13 such as LCSWs, as well as licensed psychologists and psychiatrists. From 2000 until 2014,  
14 Respondent also served as the Assistant Director at Rosewood Institute. In 2014, the Rosewood  
15 Institute, and over 50 other agencies and institutes like the Rosewood Institute, lost their  
16 certification in Oregon. Rosewood Institute was never re-certified. Nevertheless, Respondent  
17 continued to provide mental health services to clients and used the website  
18 "<https://spiritinbloom.com/>." Respondent's Master's level degree in psychology did not fulfill  
19 the educational requirements under ORS 675.825 (4)(a) to qualify for an exemption and  
20 therefore, she is not qualified to practice psychology in the State of Oregon, neither is she  
21 qualified for licensure as a licensed professional counselor or therapist.

22 3.2 Respondent provided outpatient mental health services to Patient A from July 13,  
23 2017 to February 28, 2019 even though she is not licensed to practice as a mental health care  
24 provider in Oregon, to include practicing as a psychologist. Respondent began to provide mental  
25 health care services to Patient A on July 13, 2017. Respondent later characterized this work as  
26 "alternative modalities of spiritual healing, life coaching, hypnotherapy, soul work and energy

1 work.” The records reviewed by the Board reflect that after several sessions, Patient A requested  
2 that Respondent accept her new Oregon Health Plan Insurance (OHP) for payment. After  
3 Respondent refused, stating that she was not an OHP provider, Patient A arranged with OHP  
4 through CareOregon for a “Single Case Agreement.” Respondent entered into such an  
5 agreement on September 18, 2017. The services Respondent was to provide to Patient A were as  
6 follows:

7 “The intent of this Agreement is to ensure continuity of care for •the CareOregon Jackson  
8 Care Connect (JCC) member [Patient A] who has been receiving outpatient mental health  
9 services from Provider. Provider agrees to continue to provide outpatient mental health  
10 services, as listed in Attachment A for the remainder the member’s treatment plan. Services  
must be preauthorized by Company’s Medical Benefits Assurance Department in advance.”

11 Respondent’s report contains some disclaimers, such as: “Archival data cannot make a diagnosis,  
12 only clinical interviews informed by data can make a diagnosis.” Nevertheless, Attachment “A”  
13 to the agreement, under authorization #714332 provided a list of services that were to be  
14 provided. The “List of Outpatient Mental Health Services” were as follows:

15 Company will reimburse Provider in accordance with the compensation set forth in this  
16 Agreement for the following outpatient mental health services provided to CareOregon  
17 Jackson Care Connect member AH301K4G with the dates of service period from September  
18 18, 2017 to September 17, 2018. Services will be limited to services authorized based on the  
Authorization 714332. Changes to Attachment A will require written approval from both  
parties.

19 Service Code(s): 90791<sup>1</sup> / 90792<sup>2</sup> / 90785<sup>3</sup> / S9453 / 9832 to 90834 / 90836 to 90840 / 90846  
20 to 90847 / T1016 / 90849 / 90853 / 90882 / 90887 / G0176 / H0023 / H0031 and H0032 / H0004  
21 / H0034 / H0036 / H0038 / H2000 / H2010 and H2011 / G0177 / H0002 / T1023 / H2014 /  
H2021 / H2023 / H2032

22 The above codes are part of a fee schedule maintained by the Oregon Health Authority (OHA).

23 None of the above codes describe “*alternative modalities of spiritual healing, life coaching,*  
24 \_\_\_\_\_

25 <sup>1</sup> For purposes of illustration—Current Procedural Terminology (CPT) code 90791 refers to a Psychiatric Diagnostic  
Evaluation. This code is used for an initial diagnostic interview exam that does not include any medical services.

26 <sup>2</sup> CPT code 90792 refers to Psychiatric Diagnosis Interview Examination (PDE) performed by a licensed mental  
health provider.

<sup>3</sup> CPT code 90785 is an add-on code specific for psychiatric services and refers to communication difficulties during  
the psychiatric procedure.

1 *hypnotherapy, soul work and energy work.*” On October 8, 2018, Respondent submitted a  
2 “Mental Health Notice of Treatment Request” form to CareOregon. The form was used to  
3 request an extension to Patient A’s original “Single Case Agreement.” The form was filled out  
4 by Respondent. It indicates she was requesting to continue “Outpatient Mental Health” for  
5 Patient A. The form has the following boxes checked:

- 6
- 7 > “Assessment updated within 60 days prior to the date of request that includes:”
    - 8 ✓ “Individualized plan that describes the members condition and services that will  
9 be needed\*”
    - 10 ✓ “Specific and measurable goal(s) of services\*”
    - 11 ✓ “Expected outcome(s) and duration of the services\*”

12 \* Service types denoted with a “\*” require submission of relevant clinical information such  
13 as a current and valid assessment and treatment plan. Authorization is dependent upon  
14 clinical review by JCC UM Team.

15 Respondent also provided an “Updated Assessment” of Patient A which includes two (2)  
16 Diagnostic and Statistical Manual of Mental Disorders (DSM–5) diagnoses as follows;  
17 “(309.28)-F43.23 Adjustment Disorder with Depression and Anxiety – Chronic” and “(309.4) -  
18 F43.25 Adjustment Disorder with Depression, Anxiety and Disturbances of Conduct.”  
19 Respondent also provided the “Goals” and “Objectives” for Patient A’s continued Outpatient  
20 Mental Health Services.

21 3.3 In January 2019, Respondent had a website that presented information about  
22 herself to the public, to include on the first page the following:

23 “Nancy Bloom is a Counselor with a Master’s Degree in Psychology, and a Certified Clinical  
24 Hypnotherapist and Life Coach. She is in private practice in Southern Oregon, and for 26 years  
25 also worked as a psychotherapist at the Rosewood Institute, a State Certified Outpatient Mental  
26 Health Facility, where she served as Assistant Director and Director, as well.”

On the seventh (7<sup>th</sup>) page of the website, Respondent’s website stated the following:

1 "Nancy has a Master's Degree in Psychology, and continues her work as a psychotherapist in  
2 private practice, having also worked as a counselor for 26 years at the Rosewood Institute, a  
State Certified Outpatient Mental Health Institute in Southern Oregon, where she also served  
as its Assistant Director and then Director."

3 Respondent also listed the following on the website as things she can "help" with:

4 Stress Management, Goal Setting, Fears & Phobias, Anxiety & Panic Attacks, Weight  
5 Loss & Management, Coping with Grief, Pain Management, Self-Confidence,  
6 Motivation, Performance Anxiety, Self-Forgiveness, Sports Performance, Healing  
childhood trauma, And more...

7 By making representations that she worked as a psychotherapist, Respondent represented herself  
8 to be a psychologist in the context of providing services included in the practice of psychology,  
9 and those services referred to rendering or offering to render consultation, evaluation or therapy  
10 services to individuals for the purpose of diagnosing or treating behavioral, emotional or mental  
11 disorders.

12 4.

13 CONCLUSIONS OF LAW

14 Respondent's above described conduct violated the following statutes, as set forth below:

15 4.1 Respondent's above described conduct violated ORS 675.020(1)(a), in that she  
16 engaged in the unlicensed practice of psychology, as defined by ORS 675.010(4) by rendering or  
17 offering consultation, evaluation or therapy services to Patient A for the purpose of diagnosing or  
18 treating behavioral, emotional or mental disorders.

19 4.2 Respondent's above described conduct also violated ORS 675.020(1)(b), as defined by  
20 ORS 675.020(2), in that Respondent represented herself to be a psychologist by using any title or  
21 description of services incorporating the words "psychology," "psychological," "psychotherapy," or  
22 "psychologist," or to offer or render to individuals or groups of individuals services includes in the  
23 practice of psychology, as defined by ORS 675.010(4).

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ORDER

IT IS HEREBY ORDERED THAT Nancy Blum, Respondent, having been found to have engaged in the unlicensed practice of psychology and unlawfully representing herself to be a psychologist; Respondent must pay a civil penalty of \$5,000 within 90 days from the signing of this Order. This Order is a public record and is a disciplinary action that is reportable to the National Practitioner Data Bank.

DATED this 16<sup>th</sup> day of March, 2021.

BOARD OF PSYCHOLOGY  
State of Oregon

  
CLIFFORD JOHANNSEN, Ph.D.  
Board Chair

Right to Judicial Review

NOTICE: You are entitled to judicial review of this Order. Judicial review may be obtained by filing a petition for review with the Oregon Court of Appeals within 60 days after the final order is served upon you. See ORS 183.482. If this Order was personally delivered to you, the date of service is the day it was mailed, not the day you received it. If you do not file a petition for judicial review within the 60 days' time period, you will lose your right to appeal.

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BEFORE THE  
BOARD OF PSYCHOLOGY  
STATE OF OREGON

In the Matter of the Conduct of ) AGENCY NO: OBOP #2019-064  
)  
)  
NANCY BLUM ) NOTICE OF INTENT TO IMPOSE CIVIL  
RESPONDENT ) PENALTY

1.

The Board of Psychology (Board) is the state agency responsible for licensing and disciplining psychologists, and for regulating the practice of psychology in the State of Oregon. The Board is also responsible for enforcing the laws against the unlicensed practice of psychology in the State of Oregon. Nancy Blum (Respondent) is not licensed by the Board to practice psychology in the State of Oregon.

2.

The Board proposes to impose a civil penalty of \$5,000 against Respondent, pursuant to ORS 675.010(4), ORS 675.020(1)(a), (b), and (2); ORS 675.070(2)(h) and ORS 675.070(3)(b), for engaging in the unlicensed practice of psychology in Oregon by offering or rendering services included in the practice of psychology and representing herself to be a psychologist. Respondent's acts and conduct that form the basis for the Board's action are described below:

2.1 Respondent, who is also known as (aka) Nancy Bloom, does not hold a license to practice as a mental health professional in Oregon. From 1973 to present, Respondent has worked as an ordained minister through the Church of the Gentle Brothers & Sisters, providing spiritual counseling and spiritual healing, along with officiating at weddings in Southern Oregon and Northern California. In 1983, Respondent received a Master's degree in psychology from Sonoma State University in California. From 1990 until 2014, Respondent worked at the Rosewood Institute, which was established in 1990 as an Oregon state certified mental health

1 center. Individuals' with a master's degree worked under the regular supervision of supervisors,  
2 such as LCSWs, as well as licensed psychologists and psychiatrists. From 2000 until 2014,  
3 Respondent also served as the Assistant Director at Rosewood Institute. In 2014, the Rosewood  
4 Institute, and over 50 other agencies and institutes like the Rosewood Institute, lost their  
5 certification in Oregon. Rosewood Institute was never re-certified. Nevertheless, Respondent  
6 continued to provide mental health services to clients and used the website  
7 "https://spiritinbloom.com/." Respondent's Master's level degree in psychology did not fulfill  
8 the educational requirements under ORS 675.825 (4)(a) to qualify for an exemption and  
9 therefore, she is not qualified to practice psychology in the State of Oregon, neither is she  
10 qualified for licensure as a licensed professional counselor or therapist.

11 3.2 Respondent provided outpatient mental health services to Patient A from July 13,  
12 2017 to February 28, 2019 even though she is not licensed to practice as a mental health care  
13 provider in Oregon, to include practicing as a psychologist. Respondent began to provide mental  
14 health care services to Patient A on July 13, 2017. Respondent later characterized this work as  
15 "alternative modalities of spiritual healing, life coaching, hypnotherapy, soul work and energy  
16 work." The records reviewed by the Board reflect that after several sessions, Patient A requested  
17 that Respondent accept her new Oregon Health Plan Insurance (OHP) for payment. After  
18 Respondent refused, stating that she was not an OHP provider, Patient A arranged with OHP  
19 through CareOregon for a "Single Case Agreement." Respondent entered into such an  
20 agreement on September 18, 2017. The services Respondent was to provide to Patient A were as  
21 follows:

22 "The intent of this Agreement is to ensure continuity of care for the CareOregon Jackson  
23 Care Connect (JCC) member [Patient A] who has been receiving outpatient mental health  
24 services from Provider. Provider agrees to continue to provide outpatient mental health  
25 services, as listed in Attachment A for the remainder the member's treatment plan. Services  
26 are limited to services authorized based on Authorization 714332. Any additional services  
must be preauthorized by Company's Medical Benefits Assurance Department in advance."

1 Respondent's report contains some disclaimers, such as: "Archival data cannot make a diagnosis,  
2 only clinical interviews informed by data can make a diagnosis." Nevertheless, Attachment "A"  
3 to the agreement, under authorization #714332 provided a list of services that were to be  
4 provided. The "List of Outpatient Mental Health Services" were as follows:

5  
6 Company will reimburse Provider in accordance with the compensation set forth in this  
7 Agreement for the following outpatient mental health services provided to CareOregon  
8 Jackson Care Connect member AH301K4G with the dates of service period from September  
9 18, 2017 to September 17, 2018. Services will be limited to services authorized based on the  
10 Authorization 714332. Changes to Attachment A will require written approval from both  
11 parties.

12 Service Code(s): 90791<sup>1</sup> / 90792<sup>2</sup> / 90785<sup>3</sup> / S9453 / 9832 to 90834 / 90836 to 90840 / 90846  
13 to 90847 / T1016 / 90849 / 90853 / 90882 / 90887 / G0176 / H0023 / H0031 and H0032 / H0004  
14 / H0034 / H0036 / H0038 / H2000 / H2010 and H2011 / G0177 / H0002 / T1023 / H2014 /  
15 H2021 / H2023 / H2032

16 The above codes are part of a fee schedule maintained by the Oregon Health Authority (OHA).

17 None of the above codes describe "*alternative modalities of spiritual healing, life coaching,*

18 *hypnotherapy, soul work and energy work.*" On October 8, 2018, Respondent submitted a

19 "Mental Health Notice of Treatment Request" form to CareOregon. The form was used to

20 request an extension to Patient A's original "Single Case Agreement." The form was filled out

21 by Respondent. It indicates she was requesting to continue "Outpatient Mental Health" for

22 Patient A. The form has the following boxes checked:

- 23
- 24 ➤ "Assessment updated within 60 days prior to the date of request that includes:"
    - 25 ✓ "Individualized plan that describes the members condition and services that will be  
26 needed\*"
    - 27 ✓ "Specific and measurable goal(s) of services\*"

28 \_\_\_\_\_  
29 <sup>1</sup> For purposes of illustration--Current Procedural Terminology (CPT) code 90791 refers to a Psychiatric Diagnostic  
30 Evaluation. This code is used for an initial diagnostic interview exam that does not include any medical services.

31 <sup>2</sup> CPT code 90792 refers to Psychiatric Diagnosis Interview Examination (PDE) performed by a licensed mental  
32 health provider.

33 <sup>3</sup> CPT code 90785 is an add-on code specific for psychiatric services and refers to communication difficulties during  
34 the psychiatric procedure.

1           ✓ “Expected outcome(s) and duration of the services\*”

2           \* Service types denoted with a "\*" require submission of relevant clinical information such  
3           as a current and valid assessment and treatment plan. Authorization is dependent upon  
4           clinical review by JCC UM Team.

5           Respondent also provided an “Updated Assessment” of Patient A which includes two (2)  
6           Diagnostic and Statistical Manual of Mental Disorders (DSM–5) diagnoses as follows;  
7           “(309.28)-F43.23 Adjustment Disorder with Depression and Anxiety – Chronic” and “(309.4) -  
8           F43.25 Adjustment Disorder with Depression, Anxiety and Disturbances of Conduct.”  
9           Respondent also provided the “Goals” and “Objectives” for Patient A’s continued Outpatient  
10          Mental Health Services.

11          3.3     In January 2019, Respondent had a website that presented information about  
12          herself to the public, to include on the first page the following:

13                “Nancy Bloom is a Counselor with a Master’s Degree in Psychology, and a Certified Clinical  
14                Hypnotherapist and Life Coach. She is in private practice in Southern Oregon, and for 26 years  
15                also worked as a psychotherapist at the Rosewood Institute, a State Certified Outpatient Mental  
16                Health Facility, where she served as Assistant Director and Director, as well.”

17          On the seventh (7<sup>th</sup>) page of the website, Respondent’s website stated the following:

18                “Nancy has a Master's Degree in Psychology, and continues her work as a psychotherapist in  
19                private practice, having also worked as a counselor for 26 years at the Rosewood Institute, a  
20                State Certified Outpatient Mental Health Institute in Southern Oregon, where she also served  
21                as its Assistant Director and then Director.”

22          Respondent also listed the following on the website as things she can “help” with:

23                Stress Management, Goal Setting, Fears & Phobias, Anxiety & Panic Attacks, Weight  
24                Loss & Management, Coping with Grief, Pain Management, Self-Confidence,  
25                Motivation, Performance Anxiety, Self-Forgiveness, Sports Performance, Healing  
26                childhood trauma, And more...

27          By making representations that she worked as a psychotherapist, Respondent represented herself  
28          to be a psychologist in the context of providing services included in the practice of psychology,  
29          and those services referred to rendering or offering to render consultation, evaluation or therapy  
30          services to individuals for the purpose of diagnosing or treating behavioral, emotional or mental  
31          disorders.

1 4.

2 4.1 Respondent's above described conduct violated ORS 675.020(1)(a), in that she  
3 engaged in the unlicensed practice of psychology, as defined by ORS 675.010(4) by rendering or  
4 offering consultation, evaluation or therapy services to Patient A for the purpose of diagnosing or  
5 treating behavioral, emotional or mental disorders.

6 4.2 Respondent's above described conduct also violated ORS 675.020(1)(b), as defined by  
7 ORS 675.020(2), in that Respondent represented herself to be a psychologist by using any title or  
8 description of services incorporating the words "psychology," "psychological," "psychotherapy," or  
9 "psychologist," or to offer or render to individuals or groups of individuals services includes in the  
10 practice of psychology, as defined by ORS 675.010(4).

11 5.

12 The Board has authority to impose a civil penalty of up to \$10,000 against Respondent  
13 for practicing psychology without a license, pursuant to ORS 675.020(1)(a) and (b), and (2),  
14 ORS 675.070(1)(h), and ORS 675.070(3)(b).

15 6.

16 **NOTICE OF RIGHT TO REQUEST A HEARING**

17 Respondent has the right, if Respondent requests, to have a formal contested case hearing  
18 before an Administrative Law Judge to contest the matter set out above, as provided by Oregon  
19 Revised Statutes 183.310 to 183.497. At the hearing, Respondent may be represented by an  
20 attorney and subpoena and cross-examine witnesses. If Respondent requests a hearing, the  
21 request must be made in writing to the Board, must be received by the Board within thirty (30)  
22 days from the mailing of this notice, and must be accompanied by a written answer to the  
23 charges contained in this notice. Before commencement of the hearing, Respondent will be  
24 given information on the procedures, right of representation and other rights of parties relating to  
25 the conduct of the hearing as required under ORS 183.413-415.

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**NOTICE TO ACTIVE DUTY SERVICEMEMBERS:** Active Duty Servicemembers have a right to stay these proceedings under the federal Servicemembers Civil Relief Act. For more information contact the Oregon State Bar at 800-452-8260, the Oregon Military Department at 503-584-3571 or the nearest United States Armed Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not have a toll-free telephone number.

6.

**NOTICE OF CONSEQUENCES OF FAILURE TO FILE AN ANSWER**

If Respondent fails to request a hearing within 30 days, or fails to appear at the hearing as scheduled, the Board may issue a final order by default and impose the above sanctions against Respondent. Respondent's submissions to the Board to-date regarding the subject of this case and all information in the Board's files relevant to the subject of this case automatically become part of the evidentiary record of this Board action upon default for the purpose of proving a *prima facie* case. ORS 183.417(4).

DATED this 1<sup>st</sup> day of DECEMBER, 2020.

BOARD OF PSYCHOLOGY  
State of Oregon

**REDACTED SIGNATURE**

Ch  
Executive Director