# OREGON BOARD OF LICENSED PROFESSIONAL COUNSELORS & THERAPISTS Rulemaking Q&A

*Limited permit, renewal processes and requirements, client records, fee reductions, alternative name, and cleanup.* 

### 1. Q. When does the Board's rule change become effective?

A. January 1, 2024 (if approved).

#### 2. Q. What will these amendments do?

- A. The proposed rule changes are summarized as follows:
  - Licensing fees will be <u>reduced</u>.
  - <u>Licenses will be renewed biennially</u> (every two years) instead of annually. Some licensees will have prorated fees and continuing education reporting periods to facilitate this transition.
  - Registered associates will no longer submit supervision reports every six months. Instead, they will submit <u>annual supervision reports</u> along with their registration renewal. Clinical <u>hours will no longer be denied</u> when the report is submitted past the due date.
  - All licensees, registered associates, and temporary practitioners will be required to provide and update the Board with any <u>nickname or alternative</u> <u>personal name</u> within 30 days of any change. This option will be available in the Licensee Portal, under the "Personal Information" menu option.
  - The Board will offer a <u>new limited permit</u> for those who have a current, active license to practice professional counseling or marriage and family therapy in good standing in another state based on a graduate degree. This will allow for the provision of services for a limited specific purpose and time-specific period. Please see our <u>Permit Webpage</u> for more detail.
  - In addition to spouses, domestic partners of military Armed Forces members will qualify for temporary practice authorization.
  - Other amendments include changes to the rules to clarify new online application and renewal processes, readability improvements, removal of obsolete language, and other clarifying and housekeeping measures.

### 3. Q. Can I still submit a public comment on this package of amendments?

A. No. The Board issued a <u>Notice of Proposed Rulemaking</u> on August 9, 2023, and accepted comments from members of the public until September 21, 2023. The comment period is now closed. Under Oregon law, a state agency cannot accept further comments without reopening the comment period for everyone. Doing so would delay the proposed effective date of January 1, 2024 for these amendments.

# 4. Q. Can I contact individual Board members to express my opinions on the rules?

A. It is <u>not</u> appropriate to contact individual Board members to attempt to lobby for a particular position or action. Board members are not able to speak as individuals about a Board matter or make any individual decisions outside of the full Board. Please maintain professional boundaries and do not put your colleagues in this position.

### 5. Q. Which fees are being reduced and by how much?

<b>Board of Licensed Professional Counselors &amp; Therapists – FEE REDUCTIONS</b>											
<b>Fee Type</b>	Current	NEW 2024	Change								
	(Annual)	(Biennial)									
Active License Renewal	\$165	\$290 (\$145 per year)	-12%								
Inactive License Renewal	\$100	\$180 (\$90 per year)	-10%								
Initial License	\$125	\$115	-8%								
Registered Associate Annual Renewal	\$120	\$105	-13%								
Temporary Practice Authorization	\$505	\$405	-11%								

A. The following changes are proposed to take effect on January 1, 2024.

### 6. Q. I want my fee reduced earlier than January 1, 2024. Is that possible?

A. No. This would mean granting a variance to the rules, which is not only arbitrary and unfair to other fee-paying licensees/registrants, but also illegal.

# 7. Q. If a registered associate previously had a six-month report denied due to a late report, can those hours qualify towards licensure with this rule change?

- A. Yes. A registered associate who was previously denied clinical hours due to late submission of a six-month report may resubmit their hours using the new annual Supervision Report form. Please use the following instructions:
  - Do not resubmit any new report until on or after January 1, 2024. The new Supervision Report form will be available; do not use the old sixmonth report. Hours submitted early or using the old form will be returned for resubmission. Please follow instructions and avoid processing delays!
  - If the previously denied hours are needed to immediately qualify you for licensure, you may submit the Supervision Report via the <u>Licensee Portal</u> immediately on or after January 1, 2024. This will trigger Board staff to review the your file to determine if licensure requirements are met. Staff will review submissions and respond if further information is needed or if there is a problem with a report.
  - If you will not immediately qualify for licensure with the addition of previously denied hours, we ask that you please wait and submit an additional Supervision Report along with your annual renewal.

Note that hour denials which resulted from reasons other than late reports (e.g. insufficient supervision) will still not qualify following this rule amendment.

### 8. Q. Will registered associates move to biennial renewals?

A. No. Because of the temporary and transitional nature of registration, annual renewals are appropriate for registered associates who are practicing under supervision and working towards licensure.

### 9. Q. What will the transition to biennial renewals look like for licensees?

A. Your renewal will still be due by the last day of your birth month, but evennumbered licenses will renew in even-numbered years, and odd-numbered licenses will renew in odd-numbered years. Because this begins in 2024, oddnumbered licensees will still renew in 2024, but their fee and continuing education (CE) will be prorated so that they will be on-track to normal biennial renewals beginning in 2025 and subsequent odd-numbered years. Please see our <u>Transition Schedule</u> at the end of this document for a helpful visual.

## **OBLPCT License Renewal Transition Schedule- Biennial Renewals**

## **Even-Numbered Licenses:**

	2024 Renev	val			2026 Renev	val		2028 Renewal					
Birth Month	Renewals Open	Renewal Due Date	CE Due	Fee	Renewals Open	Renewal Due Date	CE Due	Fee		Renewals Open	Renewal Due Date	CE Due	Fee
January*	1/1/24	1/31/24	40	Biennial	12/17/25	1/31/26	40	Biennial		12/17/27	1/31/28	40	Biennial
February	1/15/24	2/29/24	40	Biennial	1/14/26	2/28/26	40	Biennial		1/15/28	2/29/28	40	Biennial
March	2/15/24	3/31/24	40	Biennial	2/14/26	3/31/26	40	Biennial		2/15/28	3/31/28	40	Biennial
April	3/16/24	4/30/24	40	Biennial	3/16/26	4/30/26	40	Biennial		3/16/28	4/30/28	40	Biennial
May	4/16/24	5/31/24	40	Biennial	4/16/26	5/31/26	40	Biennial		4/16/28	5/31/28	40	Biennial
June	5/16/24	6/30/24	40	Biennial	5/16/26	6/30/26	40	Biennial		5/16/28	6/30/28	40	Biennial
July	6/16/24	7/31/24	40	Biennial	6/16/26	7/31/26	40	Biennial		6/16/28	7/31/28	40	Biennial
August	7/17/24	8/31/24	40	Biennial	7/17/26	8/31/26	40	Biennial		7/17/28	8/31/28	40	Biennial
September	8/16/24	9/30/24	40	Biennial	8/16/26	9/30/26	40	Biennial		8/16/28	9/30/28	40	Biennial
October	9/16/24	10/31/24	40	Biennial	9/16/26	10/31/26	40	Biennial		9/16/28	10/31/28	40	Biennial
November	10/16/24	11/30/24	40	Biennial	10/16/26	11/30/26	40	Biennial		10/16/28	11/30/28	40	Biennial
December	11/16/24	12/31/24	40	Biennial	11/16/26	12/31/26	40	Biennial		11/16/28	12/31/28	40	Biennial

## **Odd-Numbered Licenses:**

	2024 Renev	val***	-		2025 Renev	val			2027 Renewal				
Birth Month	Renewals Open	Renewal Due Date	CE Due	Fee**	Renewals Open	Renewal Due Date	CE Due***	Fee	Renewals Open	Renewal Due Date	CE Due	Fee	
January*	1/1/24	1/31/24	40	Half Biennial	12/17/24	1/31/25	20	Biennial	12/17/26	1/31/27	40	Biennial	
February	1/15/24	2/29/24	40	Half Biennial	1/14/25	2/28/25	20	Biennial	1/14/27	2/28/27	40	Biennial	
March	2/15/24	3/31/24	40	Half Biennial	2/14/25	3/31/25	20	Biennial	2/14/27	3/31/27	40	Biennial	
April	3/16/24	4/30/24	40	Half Biennial	3/16/25	4/30/25	20	Biennial	3/16/27	4/30/27	40	Biennial	
May	4/16/24	5/31/24	40	Half Biennial	4/16/25	5/31/25	20	Biennial	4/16/27	5/31/27	40	Biennial	
June	5/16/24	6/30/24	40	Half Biennial	5/16/25	6/30/25	20	Biennial	5/16/27	6/30/27	40	Biennial	
July	6/16/24	7/31/24	40	Half Biennial	6/16/25	7/31/25	20	Biennial	6/16/27	7/31/27	40	Biennial	
August	7/17/24	8/31/24	40	Half Biennial	7/17/25	8/31/25	20	Biennial	7/17/27	8/31/27	40	Biennial	
September	8/16/24	9/30/24	40	Half Biennial	8/16/25	9/30/25	20	Biennial	8/16/27	9/30/27	40	Biennial	
October	9/16/24	10/31/24	40	Half Biennial	9/16/25	10/31/25	20	Biennial	9/16/27	10/31/27	40	Biennial	
November	10/16/24	11/30/24	40	Half Biennial	10/16/25	11/30/25	20	Biennial	10/16/27	11/30/27	40	Biennial	
December	11/16/24	12/31/24	40	Half Biennial	11/16/25	12/31/25	20	Biennial	11/16/27	12/31/27	40	Biennial	

- \* The 2024 January birth month renewals would typically open on 12/17/23, but will be frozen until 1/1/24 to facilitate this transition and ensure licensees receive the reduced fee. The new biennial fees become effective in the licensing system at 12:01 a.m. on January 1, 2024.
- \*\* In 2024, odd-numbered licensees have a PRORATED one-year renewal period to facilitate the transition, and pay a prorated licensing fee (\$145 for active status, \$90 for inactive status).
- \*\*\* Due to the prorated one-year renewal period, in 2025, odd-numbered licensees will report HALF the normal CE due. The proration includes a minimum 3 ethics, 2 cultural competency, 1 suicide risk, and 1.5 supervision-related training for supervisors. This will revert to the usual 40 total clock hours in 2027.