

OHA Psilocybin Services - 2026 Part 1

RAC 1 - Training & Facilitation - Meeting 1 - July 6, 2026

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Speaker 1: Welcome everyone. We're going to take a few minutes just to give people time to find us here, and then we'll get started. Again, welcome. We are gonna wait just a minute or 2, and then we will get started.

Thanks for being here. Feel free to grab a glass of water, get comfortable.

Okay, I think we have most everyone here. There might be one or 2.

So thanks for hanging tight as we get settled here in the Zoom room, and we'll get started very soon.

Speaker 2: Emily, I'm just going to say the, the time and the date and the name of the meeting, and then we've got our section manager, Angela Olby, who is up first on the agenda to offer some remarks.

So today is the Rules Advisory Committee meeting for Oregon Psilocybin Services. It is July 6th, 2026.

It is approximately 1:00 PM, and this meeting is being recorded. This is RAC number 1, training and facilitation. Thank you.

Speaker 3: Thanks, Jesse, and good afternoon, everyone.

Thank you all, first of all, for participating in this Rules Advisory Committee, and thank you for those of you that are listening in. As Jesse mentioned, my name is Angie Albee, and I am the section manager for the Oregon Psilocybin Services Section, and it's important for me to just make some comments this morning or this afternoon as you get started into this conversation. So that you can focus all of your feedback on the administrative rules, and I can be the one to kind of make sure that you have this foundational information. For those of you who have been following along in our section's development for over the past 5 years, you'll know that we've been pretty open about the challenges of being a fee-based section and how the cost of licensing fees statutorily have to cover the cost of our section's work.

You've also heard probably a presentation from me, or you've received one of the budget overview documents at some point in time that describes the challenges of our budget.

This is the first time that we've- we'll be experiencing a budget shortfall.

So, we've been very proud to say that we've not experienced a budget shortfall until now.

But now we're here.

And so the challenge last year was that we were talking about this budget shortfall and concerned that we would have to raise licensing fees, and now we're here and we're actually being directed to increase our licensing fees.

There is no other alternative.

So when this announcement was sent out on Friday, June 26th, you will have noticed that, you know, of course we wanted to bring this to everyone's attention so that there was public awareness. Our section has the Psilocybin Control and Regulation Fund that's established in statute, and that receives fee funds and a small amount of psilocybin tax revenue from the 15% tax on psilocybin products when service centers sell products to clients. Of course, they send, they send in their quarterly payments to the Department of Revenue, and then the Department of Revenue will take their administrative portion, and we'll get a small amount back to help support the program. That's what we have available to us.

There are no approved policy option packages for the '27-'29 biennium, and there was nothing approved for the biennium we're currently in now, the '25-'27 biennium. And that means that there's no conversation or no approval to have a conversation for our section to have any kind of additional support from the legislature.

So, that's why we are having to increase licensing fees and eliminate the reduced fees, and these are because of costs that are outside of our section's control. We've been pretty open about that, happy to provide information at a later time, but we do understand as a section that fee increases may disproportionately impact the folks that qualify for reduced fees, so low-income, veteran, and nonprofit applicants.

We were very intentional to put those reductions into rules and to try to build as much affordability in this model as we had the ability to.

We know this is also going to have a significant impact to the regulated community and essentially to clients, but we are not allowed to advocate. The Oregon Psilocybin Services Section is part of state government. We're the executive branch, and we work under the guidance of our agency director, our governor, our public health director, and, you know, also the Department of Administrative Services policies.

And so it's just important to ensure that you all understand we do what we can to support the success of this model, but we are unable to advocate.

So this is not a venue to do that advocacy. Of course, you'll have probably some feedback about the fee increases in our administrative rules, the proposed rules that you're discussing. But it's just important to share with you that we understand.

We also share those concerns, but we have no other option available to us.

And so Jesse will describe more, but these proposed rules you're discussing are So, you know, expected to be effective January 1st, 2027.

So we encourage you to participate in our public comment period, September 1st through the 21st. And we can't get involved with advocacy, but there's a lot going on outside of the section.

And, you know, to advocate to decision makers.

And so, you know, we're unable to provide that guidance or direction. And this is, not the venue to talk about that, but I just wanted to make sure that I mentioned that here today.

You also saw another recent announcement that went out last Wednesday, July 1st, and as some of you know, both the Oregon Medical Marijuana Program and the Oregon Psilocybin Services Section are experiencing budget shortfalls.

We've taken significant steps to reduce costs and try to raise revenue over the past years for the OPS side. And I know for the OMMP side, the Oregon Medical Marijuana Program, they've also done the same. We've not filled vacant positions. I've reduced the number of positions in this section.

We've reduced as many costs as we possibly can, but the costs have definitely exceeded our revenue and continue to rise.

And so the next step in our resource-limited environment is to ultimately bring together and merge together the Oregon Psilocybin Services Section with the Oregon Medical Marijuana Program. We have a proposed section name of the Psilocybin and Medical Cannabis Section, and the transition date will be September 1st of this year, so only a few months away. I'll be leading this section, and Megan Lockwood, who's the amazing section manager at the Oregon Medical Marijuana program will be leading the Health Licensing Office.

And so this is an announcement that went out last Wednesday. For those of you that are on our distribution list, you can absolutely, you know, you've already received this. It's a difficult time because we are not in a time of expansion and we are in a time of very limited resources, not just for our 2 sections but for the agency at large, and so I think that if you're following Oregon Health Authority, this will be not anything new to you, but I want to share that our goal for this transition is to ensure that our team

who come to work every day and work hard to make this work a success and to do our work and to support the public and to support our licensees are supported themselves, and also to create continuity and stability for our regulated community and our partners.

And so I know that this is difficult news, and I just wanted to make sure that I provided this to you all prior to this conversation, because this Rules Advisory Committee will be discussing proposed rules, and many of you probably have a lot of questions that we're unable to answer at this time.

So I hope that's helpful. I hope that gives you a helpful foundation. And we also just want to share that we very much understand and share the concerns. We've been very vocal about those for the past 5 years, but there is no, um, no additional change.

There have been no additional changes to the statute, and we are a fee-based section.

So this is the step that we have been directed to take. Um, we hope that this is helpful information and just want to say thank you. again for being here, and thank you for serving on this Rules Advisory Committee. Jesse, did I miss anything that- or Emily or Meredith- that would be helpful before you get started?

Speaker 2: I don't believe so.

Speaker 3: Okay. Well, with that, I'm going to hop off of this call and turn it over to our fabulous team. And again, I just want to say with a lot of compassion and respect that this You know, this model has been very important to all of us, and we hope that we're able to create some future sustainability.

So thank you and have a great day. Bye.

Speaker 2: Thank you, Angie. I'm going to welcome you all, and then we'll call the roll.

And we will go over some kind of lay of the land for the way this meeting is going to proceed. And I did see a hand that went up quickly and then it went down, but we can- if we have procedural questions about how the meeting will be conducted, we'll have ample time to cover all those procedural questions before we get into the substantive discussion of the rules.

So, welcome everyone. Thank you for participating.

My name is Jesse Sweet. I use he/him pronouns. I am a policy analyst for Oregon Psilocybin Services Section, and I work in the Policy and Engagement Program. We have convened this Rules Advisory Committee consisting of 2 separate tables.

This table covers rules that are most closely related to training and facilitation, and the other table will cover rules related to products and premises. There is some gray area as far as overlapping subject matter. Additionally, I made a sorting error when I prepared the drafts, so you all received a rule for consideration 4930- excuse me, OAR 333-333-4930, which was a late addition to the rule set today. Each table will also provide input on an identical statement of need and fiscal and racial equity impact statement.

In some cases, these rules are necessary to implement 2026 legislation. There was one bill that affected legislation- that affected, excuse me, psilocybin services in 2026. That is House Bill 4040. We'll note that when we get to those sections, but if you're looking for the citation, the citation is an Oregon Laws 2026 citation to-

Speaker 4: Thank you.

Speaker 2: That's Chapter 109.

So we found in the past that it's easier to call the roll to do introductions. It prevents kind of confusion with people popcornning around, and it gives us a chance to test our pronunciation of your name and gives you an opportunity to offer any corrections if we're getting it wrong.

So I will call the roll alphabetical by first name.

And when I call your name, please feel free to offer any remarks, brief remarks about the perspective that you bring and why you're here today.

So going again alphabetical by first name, the first name is Alexis Fernandez, and I understand that he has shared that he will not be available today. And we have Allison Greco.

Speaker 5: Hi, Allison Greco.

Pronunciation is correct. She/her pronouns. I'm interested in participating. I'm a psychologist by training.

I also have a neurodivergent child who's interested in access to psilocybin. And the training aspect is something that I'm keenly focused on, making sure there's not too much gatekeeping, that it's accessible.

So those are the things that I'm, I'm paying attention to.

Speaker 2: Thank you.

Amy Charlesworth.

Speaker 6: Hello, everyone. My name is Amy Charlesworth. I am a licensed psilocybin facilitator, military veteran, and I serve predominantly military veterans and first responders along with studying, understudying, and continuing to serve indigenously, training under indigenous elders from all around the world.

So my key particular focuses today are just ensuring that Indigenous practices and wisdom is not being stripped from the ability for folks to serve, such as the music and things like that that have been hot topics over the last 12 months.

So that'll be the angles that I'm focused on today.

Speaker 7: Thank you.

Speaker 2: Anaka Morris.

Speaker 8: Hi.

Speaker 9: Yes, that was correct. Thank you. I'm Anaka.

I'm actually on set today, so I I'm in the corner talking softly.

So I represent Akashic, which is an underground ceremony movement. We mostly work with cacao and other plants, but I've also been trained abroad, mostly in Jamaica, facilitating psilocybin.

So I'm interested in- I'm also an Oregon native, so just interested in how to cultivate access to the indigenous practices that I've been trained in, while also, you know, being a part of the facilitation processes that are being legalized.

I'm also a co-founder of Black Oregon Land Trust. We have about 110 acres in Corbett, Oregon, creating more access to land for Black farmers in Oregon.

Speaker 2: Thank you. Ina Zelikman.

Speaker 8: Hello everyone.

Speaker 10: Yes, so my background, I'm a mental health care nurse practitioner and I have a pretty vast background of treating pretty complex cases. And in the last couple years I've done, I've built a consulting work with, for, you know, psychedelic services particularly.

Speaker 2: I've been working with Epic providing some of their consult consultations to patients who are seeking psilocybin centers.

Speaker 8: And what I'm hoping to achieve here is how to really bring the healthcare system, you know, given that we have a new licensing passed, the dual licenses is now more permitted, which is wonderful.

Speaker 10: I feel like that's so important to create a better collaborative care between the healthcare practitioners and psilocybin centers and facilitators.

Speaker 2: Thank you. Jay Cusker.

That was perfect pronouncing that.

Speaker 4: I go by he/him.

Speaker 2: I'm a licensed marriage and family therapist.

I'm also a licensed facilitator and been working with psilocybin since the service center's open.

I'm a huge advocate for it.

I'm also part of a plaintiff of a suit against the state of Oregon to provide special access to people at end of life and palliative care. It's actually named Cusker versus Oregon, if anyone wants to look it up. The only reason my name's listed first is because it's alphabetical.

So really an advocate for this work and hope we can make this so it's more accessible to everyone. Thank you. And Julian Jaramillo Munoz.

Speaker 11: Hello, everyone.

I am Julian. I am from Ecuador. I live here in Oregon. I've been here for 5 years, so I've mostly lived in Ecuador.

I am a traditional trained medicine man from the Chachi people from Ecuador, and I never thought that I would be able to work here legally as a facilitator, but here I am, which is great. And Yeah. I am joining the voices around supporting the legislation to be more inclusive to traditional practices, as much as the traditional practices can actually be included in this setting that is regulated. But as long as the field actually wants to honor and invite these practices to be fully legal, then I will be very happy to support it in that direction.

Speaker 2: Thank you. Christina Maxey.

Speaker 8: Hi, my name is Christina Maxey, but please call me Chris. A little bit about myself, I have a behavioral health background.

I'm a trained psilocybin facilitator.

I'm also a psilocybin instructor for a school here. I live in rural Oregon in Klamath Falls. And hopefully I bring a perspective that balances the safety, accessibility for people, my life experience.

And I've also had some couple ceremonies myself in a service center.

So it's very important to me that we make sure that everything is inclusive for everybody, no matter your race or your financial background.

So I think it's important.

Speaker 1: Thank you.

Speaker 11: Thank you.

Speaker 2: And I see a couple of hands raised, and I presume that's because I was reading names out of order.

So I think we have Anne Hamilton and then Jade Wachowski.

Speaker 12: Hey guys, I'm Anne Hamilton.

I'm a licensed attorney and I run an organization called the Survivorship Collective. We've worked with Julian on, I think, almost all of our retreats so far. And we've brought over 60 cancer patients and survivors to Oregon for safe, legal, above-ground retreats with psilocybin. I'm really interested in group work and how to keep it accessible through groups.

I'm very interested in traditional wisdom traditions and also very interested in practicums and how we can make this sustainable over the long run with practicums. But mostly, I mean, most of all, I'm very interested in protecting people with disabilities so that they have- and not just end of life, but people with disabilities- so that there are reasonable accommodations where it comes to transportation to service centers, being at home, being in groups with people who are like them, where they don't have to be in a car right after a journey. Because we've had issues with people who are on chemotherapy having problems with that.

So just wanted to, yeah, say thank you for letting me participate, and I'm excited to be here.

Speaker 2: Thank you. And Jade Watkowski.

Speaker 13: Yep, you nailed it. My name is Jade.

I use she/they pronouns. My background is in mental health crisis response.

In person, I belong to one of the state-mandated resources, and we oftentimes will respond when someone is acutely in crisis following following a session, and I'm just excited to talk more about maybe trainings or how we can utilize other resources that the state offers so that facilitators feel more equipped to discuss those risks as well as what to do when, you know, maybe we are following that 6-hour, 8-hour mark and there is still not a very maybe feasible way to get back to the plan, if that makes sense. And yeah, I am an aspiring facilitator going back to grad school soon with Columbia to do a minor in psilocybin therapy.

So I'm very excited to learn from all of you and just kind of absorb as much as I can. And yeah, that's just a bit about me.

Speaker 2: Thank you very much. Lisa Snyder.

Speaker 14: Hey everybody, I'm Lisa. I'm the Director of Operations at InnerTrek. I'm a licensed facilitator. Prior to this, I worked in cannabis for 8 years.

I was trained at InnerTrek in 2023, been working as a facilitator since 2024. I'm really here to support accessibility, sustainability, and the longevity of the program, especially given the desire for a lot of people who want to do this work legally. I'm really talking with a lot of students on the front lines who are trying to understand how to do the work, and there's challenges and struggles with that.

So I'm really looking to support things making sense for the actual work being done and to support Yeah, the overall movement.

Speaker 2: Thank you. And Marcy Addy.

Speaker 8: Hi.

Speaker 10: Yeah, sorry, my voice is kind of going in and out, so I apologize.

Um, I'm the program director for Acadia Professional Learning. We are a licensed training program here in Oregon starting in 2023, and then, um, also in Colorado starting last year.

Um, so we've been kind of learning the differences between the 2 states, and that's a big focus that I have, like, what can we learn from each other? they have a system that allows, you know, actual practicum instead of just observing, you know, like, how can we kind of work these things together, make sure everyone's really well prepared?

Um, so just kind of focusing on, like Lisa said, make- making rules that make sense, making sure that everyone gets trained appropriately, um, within the regulations that we have to work inside of.

Speaker 2: Thank you. Marlon Hofer.

Speaker 7: Hey, thanks, Jesse. Pronunciation is correct.

I use he/him pronouns. I am a licensed facilitator and have been serving on these rules committees for a while, and I think my focus is also on sustainability and practical ability of the program to exist without excessive jumping through hoops to accomplish something that may be simpler in another manner.

So understanding the- maybe the background of why a rule exists, or what are you trying to accomplish with the rule, is important to me.

So those would be my questions that I will be prepared to ask is, so what are you really trying to accomplish with this?

Is there a less cumbersome way to do it? Those will be my focus.

Speaker 2: Thank you. And finally, Sam Chapman.

Speaker 4: Thanks, Jesse. Hi, everyone. My name is Sam Chapman. I use he/him pronouns.

I am the executive director of the Center for Psychedelic Policy, where we are really focused on helping states across the country learn lessons from both Oregon and Colorado. and really starting to look towards ways to incentivize state legislatures to not only support these programs that are starting to come into fruition, but to understand the economic opportunity for the state to invest in them, not just in the administration or the programs themselves, but in the people who stand to benefit the most.

I personally believe that psilocybin therapy is just as, if not more effective than many of the current available treatments that the state is investing in for Medicaid patients and other populations. But I also believe that psilocybin therapy, even at its current price point, is a fraction of the cost from other alternatives that could be just as, if not more effective. I'm here today mostly to get to know folks that I don't already know.

I'm very well-versed in what is and what isn't possible in these settings. here to support those who, who maybe it's their first round in that, but also we'll be very interested to work with people outside of this setting as well. The things that we can't get done here turn into opportunities for things that we can actually do to go change the law at the legislature. That's another avenue that I have a lot of experience in. I'll be looking for both the challenges within this process to help identify the opportunities for potential changes in law.

Speaker 2: Thank you, and I introduced myself at the outset, but I'd like to give my colleagues Meredith and Emily an opportunity to introduce themselves as well.

Speaker 1: Hi everyone, I'm Emily York. I use she/her pronouns. I'm a program analyst with Oregon Psilocybin Services, so I work closely with Jesse and Meredith and Angie Pass it over to you, Meredith.

Speaker 8: Thanks, Emily.

Speaker 6: My name is Meredith Ryder. I use she/her pronouns, and I'm the administrative specialist for the Oregon Psilocybin Services Section, and I'll probably be off camera most of the meeting, but I'm here if anyone has any like technical issues or, or

needs any other assistance.

Speaker 2: Thanks, Meredith, and thank you all for volunteering your time to assist with the Rules Advisory Committee today.

As was stated, we will be reviewing both draft rules and a draft fiscal and racial impact statement, and the purpose of these committees is to provide input on these proposed rules and the proposed impact statement. Like any state agency, our authority to adopt rules is derived from statute. Rules must be within the scope of statutory authority and cannot conflict with the statute. Additionally, rules do not typically address an agency's internal processes.

These RACs are a forum to receive feedback. They are not a forum for making decisions. To the extent that the section provides additional input during RAC meetings, we do so in order to place the draft rules in context and to clarify how they are intended to function in relation to other regulations. General questions about other OPS rules and guidance may be referred to our inbox or other resources that are publicly available.

We also provided in advance of this meeting a RAC preparation guide, so I'm currently summarizing information that is in that RAC preparation guide if you would like more detail. After these meetings conclude, revised drafts will be published for a required public comment period, which will run from September 1st to September 21st. All members of the public, including anyone who served on a RAC, may participate in that public comment period, which will include that 21-day period for written comments, as well as 2 hearings for anyone who would like to provide verbal comments. Final rules are slated to be adopted in late October and will be effective on January 1st, '27.

I'd like to share some points about meeting logistics. This is a public meeting, but we will not be taking public comment, and participation in this meeting is limited to invited RAC members. To that end, if RAC members are able to put the letters RAC in your screen name. That will assist us in facilitating the meeting.

We are recording audio, and that audio will be posted to our website at the conclusion of this meeting, maybe not at 4 o'clock, but in the near future. We ask that everyone remain muted and we use the raise- and we will use the raise hand function to facilitate the conversation and ask folks to come off mute. We have a lot of material to cover, and we're going to go section by section. I will introduce each section with a short framing section, and then Emily and I take a team facilitation approach.

So I'm going to provide that introduction, and then Emily will facilitate the conversation. I will be taking notes as you all are talking.

So if you're looking on my screen and I appear to be struggling with something, just please assume that I'm struggling with spelling or organizing my windows, and it's not in response to whoever is speaking. The chat is open, but it is for technical issues only, and Meredith can assist with that.

In certain places, we may need to cut discussions short in order to cover everything that we have on the agenda. We have 2 meetings scheduled today and tomorrow. We are unlikely to get to the impact statement today. It is not on the agenda.

We're anticipating that we'll cover that tomorrow. But I would like to share with the group that fees are covered both in the draft rules and in the impact statement. If we finish early, we will not fill time. We will just finish when we're finished if we have extra time.

We have invited members of different backgrounds and perspectives, and we want to hear from everybody. Please don't be shy of expressing critical views, but please be respectful and allow others time to speak. If you find any typos in the drafts, that is very helpful to point out, but we will not be correcting them in real time. We'll just take notes and we'll correct them later. Finally, the proposed amendments are tracked using red lines.

I'm assuming we're all familiar with that. There are a couple new rule sections, and those are going to be completely red. The draft rules contain only those rules which are proposed to be changed, and this RAC is seeing only the drafts that are relevant to your subject matter. We will go chronological, or chronological is the wrong word, in order of the sections, but there may be some places, especially with definitions, where it is helpful for us to bounce around.

So I would like to give everyone a moment to see if there's any questions about logistics or meeting facilitation before we jump into the discussion of the drafts. And it looks like, Marlon, you have a question.

Speaker 7: Yeah, my copy of the draft rules also has green as well. Is there any difference between green or red, or is that just-

Speaker 2: Yes, we have the colors of the rainbow.

I think my understanding is that when we moved a section, it would show up as green rather than red.

So there are a couple sections where we've reorganized, moved from You know, one rule subsection to another, and that's what the green is showing.

Speaker 7: Yeah, as long as it just means the same thing, it's just a different color. Got it.

Thanks. Just wanted clarification. Thank you.

Speaker 14: Thanks.

Speaker 2: Okay, if there are no other questions, I think, Emily, we're ready for you to put the drafts up.

Speaker 1: Okay.

Okay, it'll just take one moment here to get them up on the screen.

Speaker 2: All right.

Speaker 1: Are they visible?

Speaker 2: Yes, we're seeing it. Thank you. Would it- I know you all also have copies of this that you received in the meeting materials.

Would it be helpful if we Enlarge the text a little bit on the screen copy.

Speaker 1: Is that-

Speaker 2: I see one thumbs up. Yeah, that's great. OK, I mean, it's always kind of a fine line between like making it big enough to read and making it so you can see enough of the text on the screen.

So we start with the definitions and this has all of the definitions.

Some of them are going to be relevant to this table, some of them are going to be relevant to the other table, and in some places we may need to want to go back to this definition once we get to the rule where it's applied.

So what I would propose for this section is we kind of go through section by edit by edit, um, and we discuss them one at a time if there is discussion. I would also note that we will renumber these at the very end, as rule drafters like to renumber the definitions as the very last thing, so we only have to do it once.

So the first change here is advertising, and that is related- that is going to be related to rules that are amended on the product side.

So I would like to move past this one unless anybody has something that they would really like to talk about regarding the advertising definition.

Speaker 1: Sorry, Jesse, I think I'm on the right one now.

Speaker 2: Yeah, it's-

Speaker 6: Does it look okay?

Speaker 2: Yeah, it's at the bottom of the page there.

Speaker 1: Okay, I think I was just on my Word version. This should be the PDF version now.

Speaker 2: Okay.

So the, the first definition that is relevant to this table is on the screen now. It is Section 27, Curriculum. This is a clarification. The existing definition referred to topics, subjects, and activities, and this clarification indicates that activities include practicum, observation, and consultation.

So if we have any comments on this proposed revision to the curriculum definition, we, we would take them now.

Speaker 5: Marcie?

Speaker 10: Yeah, I appreciate that word observation being added next to practicum, and I actually really wish it was next to practicum every single time that it's in the regulations, because that is really all that they're doing.

And so I think it just really clarifies they are only observing.

This isn't really practicum, and I think that it just, it feels more ethical to name it that than to call it practicum.

So I really thumbs up here, and I hope that it can be added maybe anytime it mentions practicum later.

Speaker 1: Thank you.

Speaker 2: Okay, so if there's nothing else on curriculum, the next is what would be the new Section 44, but it's not numbered yet.

It's individual applicant. And again, this is a clarification. We use the term individual applicant in our licensing process, and this is clarifying what that term actually means. It is an individual who is identified on an application.

And it's distinguishable from a legal entity applicant, which we'll get to next.

Okay, if we're ready to go to legal entity applicant, which is at the top of the next page. It does something very similar, and it states that it, it is a legal entity such as a corporation or partnership that is identified as an applicant.

Okay, I'm not hearing any comments on that one.

A low-dose administration session is a new concept for this rulemaking, and it will be primarily considered by the products table. And essentially, the new rules are proposing to create a designation for products that may be used in a low-dose administration session, which is subject to a short shorter minimum duration versus products that are not permitted to be used in a low-dose administration session.

So that's for reference.

You know, the rules where this is applied are not included in the rules that we will be reviewing here with this table.

If we are ready to go to 61, Operational Name. This is just a clarification that this definition is applicable not only to licensees but also to training programs. And if applicable, it includes the registered assumed business name. that is used as an operational name.

Okay, if we are ready to go to primary point of contact, this is for clarification.

Primary point of contact is constructively defined in that Rule 4010, which is referenced in the definition. We chose to also place it in the definitions section so that anyone who's reading the rules can locate it easily.

Also, when we are referring to rule sections, you will notice that we normally just use the last 4 digits rather than saying all the 3s.

So when I say 4010, that is OAR 333-333-4010.

Speaker 4: Okay.

Speaker 2: The silosin analyte, this will be covered by the products table. That's just a clarification on the meaning of the term, which was not previously defined. Again, on the products table, we're going to see on the next page what will be presumably the new Section 92.

We have a concept of total psilocybin equivalent. This is a concept that's going to be considered by the products table, and it will be related to rules on labels and product information documents. And that concludes the changes to the definitions. We start with some boring technical stuff first, and we may go back to these definitions as needed when we get into the substantive review.

Speaker 1: Jesse, can I just ask to double confirm, do you see the 30/10 rule up?

Speaker 2: Yes, I do.

Speaker 1: For some reason it's not doing its normal framing to show me what I'm showing, so I appreciate the confirmation.

Speaker 7: Yes.

Speaker 10: Okay.

Speaker 2: Okay, so the first real substantive rule here is on the training program curriculum process, and this rule does several things. The first and most obvious is in Section 1, the fee is increased. In Section 4, We are clarifying what we mean by form and manner, and this is an edit that you are going to see throughout these drafts.

As in conjunction with this rulemaking, the section is looking at revising and streamlining forms for 2027. And as it relates to the draft rules, if you see text that reads using the form published on the authority's website, That means we will have a form, and it will be published on our website, and there's a rule where we will include that URL once we have it. If it is more of a process thing, you will still see the words form and manner.

So I wanted to frame that edit, and that's an edit that you're going to see in multiple rules as we review these drafts.

Finally, there is a clarifying provision in the next page on 5- excuse me, not 5, 5, as in dog. And this is similar to what is included for licensees. It says that essentially that we may deny an application if the training program fails to produce evidence or cooperate with an investigation. And then finally, we see the form and manner again at Section 11.

So I propose that we start off section by section from the top, if that works for everybody. And we have any comments on 1B?

Speaker 6: Marci.

Speaker 10: Is this for the first time they apply or for renewals as well?

The fee increase?

Speaker 2: So we are going to cover renewals in the next rule, I believe.

Speaker 7: Okay, thank you.

Speaker 12: Amy.

Speaker 6: Are the fee amounts up for discussion and feedback, or are we just having to accept that it's double?

Speaker 2: The purpose here is to receive your feedback.

So, you know, there's very little that we can say beyond the remarks that our section manager offered at the outset, but We're absolutely here to receive your feedback, and I misspoke in response to Marcie's question. It's not the next rule, it's 3035, so we'll be getting there in a couple rules.

Speaker 6: In that case, I do just want to leave remarks that while I understand there are financial matters that are somewhat outside of the control of the organization, I disagree with raising the fee in this particular section.

Speaker 1: Thank you, Sam.

Speaker 4: Yeah, I'd like to support the opposition to the fees raised in this section that Amy just proposed. And while this may get very redundant for all of us, and those of us who do not support fee changes also knowing that This is not a venue in which we are debating or arguing with the folks who are asking for feedback here.

It is important that if you do not support any type of changes in these documents, that you raise your hand and publicly state it. That is one of the most valuable things that will come out of this process. Even though it's going to be redundant, it feels like there is nothing that we can do about it. There will be options outside of this venue, and putting your opinion on the record does matter.

So I just wanted to encourage folks to participate in that way if they feel obligated to.

Speaker 1: Thank you. Lisa?

Speaker 14: Thanks, Sam.

Just for the record, I disagree with the fee- fees being raised in this section.

Speaker 3: Chris?

Speaker 8: I also disagree, and I wanted to, wanted to say that, you know, I'm afraid that this is going to get passed down to the students. That's a concern of mine.

And how do we balance the student protection with keeping the training pathways accessible? That's another question that I have. And could small programs receive technical assistance?

So that's another question.

And I have more that I could put on there, but again, I don't want to be taking this over, but it's- I disagree with raising the fees. In fact, I think they should be less than even the \$500.

Speaker 1: Thank you.

Speaker 13: Jade.

Hi, I just wanted to state that I agree with what everyone's saying about the fee increase. I understand an increase might be needed, but to double within less than 10 years of being in the program to me feels a bit suffocating for the accessibility of future facilitators. as well as diversity for people who might be really striving to get into this field but are struggling to get in.

So yeah, I know there's other parts in this that also go into kind of cutting the time in half to get the funds that I'll talk about later.

Speaker 1: But yeah.

Thank you. Jay?

Speaker 2: I agree with everyone who has disagreed.

Speaker 1: Thank you.

Speaker 12: Marlon?

Speaker 7: Yeah. Yes, I disagree with the fee increase. I have more comments that I'll make on the statement of need to be able to understand the reason for the fee increase in a more explicit manner.

But we'll deal with that tomorrow.

Speaker 1: Thank you. And what about 5D? Any comments there?

Speaker 4: Amy?

Speaker 6: I think just, you know, putting on a little bit of a legal hat here, specifying producing evidence, what is appropriate in terms of Evidence for them to be in compliance with this rule. What does evidence mean in this case?

Speaker 1: Thank you, Lisa.

Speaker 14: Yeah, I was gonna say something to clarify or maybe give an example of like what evidence is or what a failure to produce is. It just seems kind of vague.

Speaker 1: Thank you, Marcy.

Speaker 10: Yeah, I was thinking the same thing, that maybe like refusal is different than failure to produce, right?

It's like if they refuse to turn over evidence that they have, that's one thing, but failure to produce evidence, maybe they don't have the ability to do that, right?

So the language, I think, could use some more work.

Speaker 1: Thank you. Great.

Anything else in this rules section before we move on?

Speaker 9: Hello. Yes, I was also concerned about producing evidence. What does that mean?

But also wondering in terms of investigation, if there are particular, like, sacred things or sites in this specific location, if, like, that could be honored for- like, if there can be a conversation of how the investigation goes possibly as well, if it's, like, of a physical space. I would be curious about that.

Speaker 1: Thank you.

Speaker 2: Yeah, I would like to offer a little bit of context on, on the authority over training programs that OPS has, just to, to ground the discussion a little bit.

OPS, excuse me, Oregon Psilocybin Services Section, OPS, has authority under statute to approve curriculum. We don't have authority to license training programs. We don't have broad authority over the conduct or the finances of training programs. That is with the Higher Education Coordinating Commission.

So when we're talking about violations of ORS 475A, as is referenced in the text here, that is limited to OPS authority to approved curriculum of training programs, and that training in the curriculum includes practicum as well as core instruction.

Speaker 1: Sam?

Oh, okay, all good.

Speaker 4: I take it back.

I do have a question, Jesse.

And so are you saying that OPS would not- I'm misunderstanding the-

Speaker 2: like, is there-

Speaker 4: if either HEC decides they need to investigate or OPS investigates, does that mean both entities have to investigate? How does that work? And is there double duty that's happening there?

Speaker 2: I'm just going to touch this very briefly because it's not really relevant to the rules or this rule directly.

So it's not so much double duty as much as a bifurcation according to subject matter.

So OPS has authority over the curriculum. HECC would have authority over issues involving hypothetically things like abuse of student- financial abuse of students, you know, fraud.

I don't want to speak on behalf of another agency, but that's, you know, just one example.

So, you know, we would coordinate as needed, but our authority doesn't overlap so much as it's divided by subject matter.

Speaker 7: Great.

Speaker 1: Should we move on to the next section, Jesse?

Speaker 2: Yes.

So this is a clarification in 3020, and I touched on this when I was describing curriculum earlier. Here we are specifying in Section 3 that 3070, which is the rule which covers practicum, includes not only the identifying service centers that will act as practicum sites and practicum site supervisors, but also describing the practicum observation and consultation. And we will get to this in another rule, but as a reminder for the group, and as was stated in the introductions, you know, it may look a little bit different in other states when it comes to practicum, and the reason why is because in Oregon, provision of psilocybin services is limited to licensed psilocybin facilitators, and practicum students are not licensed psilocybin facilitators.

Speaker 7: Amy.

Speaker 6: I would just like to advocate that I think one of my key and core functions of applying to be on this committee is that I want to protect there being an overreach or an overcomplication of really basic things, and every single licensed service center has licensed psilocybin facilitators, and all of them should be able to have someone shadow or be an understudy or partner with them, etc., to get their practicum skill and hours.

So I don't think that it's necessary to have special identification of service centers or special identification of people to do this because the people who are licensed are licensed appropriately in accordance with the rules.

And so I disagree with there being a necessary need to identify certain service centers or site supervisors or observation and consultation folks.

I think it should just be that they, that the students worked with somebody to, one of the licensed people already to do this. I don't think there needs to be an overreach.

Speaker 1: Thank you.

Speaker 3: Chris?

Speaker 8: I also wanted to back up Amy on what she had to say. I agree with her on everything she had to say.

Speaker 1: Thank you. Mercy?

Speaker 10: I agree as well. Um, practicum usually doesn't work in that model where they shadow someone only because facilitators have largely refused to do so.

So training programs, we kind of, we rent out the service center, we have our own practicum site supervisor, we, we pay our facilitators to do that. But, um, when you're applying to do all of this, you're new as a training program, you might not have those connections just yet to be sure that 3 months from now, 6 months from now, a year from now, I'm going to be working at this specific training site, like, like a service center.

So I think allowing a little more flexibility with that for this application process. Of course, before they have practicum, they should have that solidified, and maybe that needs to be reported like we do in Colorado. We have to report once we have that set, who are we working with, who is our practicum site supervisor? But for the initial application, they might not know that because they're just getting started.

Speaker 6: Thank you.

Speaker 1: Anne?

Speaker 12: Yeah, I, I just agree with everything that's been said so far. This seems really onerous, and I'm afraid there's going to be a bottleneck with people who want to get practicum training not being able to access it.

Uh, I think that's a very real possibility, especially with the number of service centers going down.

So just supporting everything that's been said so far.

Speaker 1: Thank you. Lisa?

Speaker 14: I also support everything that's been said so far, especially with what Amy and Marci said. And just think logistically it can be- add more complications. Thank you.

Speaker 1: Thank you.

Alison?

Speaker 5: Yeah, I really wanted to support what others have said, but Anne in particular brought up my point about bottleneck. in my own training experience ran into difficulty finding a site, not in this context, but when I was finishing my clinical degree. And I can just see that in a struggling system where we're trying to make sure that we increase accessibility, rules like this that make it more difficult, especially in this level of sort of, I don't know, overreach is the word used, just feels like more than we need. now, and I'm not sure the problem that this is solving. That was also unclear to me.

So I really want us to take another look at how we're talking about this and the requirements we're putting in place.

Speaker 1: Thank you.

Speaker 9: Amy?

Speaker 6: I just had one additional thought.

I do want to be solution-oriented.

So somebody else just mentioned that there was maybe difficulty finding, that maybe there's an instead of adding it in as a rule. Maybe the alternate solution would be that during the application process for service centers or on the listing, maybe there's a checkbox that is optional for the service centers within their psilocybin.oregon.gov website portal that they can just elect that they're super open and friendly to practicums versus it being a rule or written anywhere. That would be a way for people to find them instead of it being a mandated registration process.

Speaker 1: Thank you. Anaka?

Speaker 9: Hi, sorry, I'm around a lot of people. Um, I agree with what's been said so far.

I'm also curious what a site supervisor's qualifications look like, because, you know, traditionally it's like we pass down how much experience you have, and that's how our hierarchy happens.

So just thinking about maybe being more specific around what is a supervisor and why they are one would be something I'm curious about. Like, is it about how much experience and what kind of experience? Just thinking about how to make it accessible for folks who are bringing in traditional knowledge to also be pillars in this sort of way.

But I agree with the apprenticeship model that has been mentioned before as well.

Speaker 1: Thank you. Anne.

Speaker 12: I'd also encourage the rules to allow for practicums at places that are not only within the Oregon jurisdiction, as long as the Oregon rules are being followed.

Colorado, for one, other states when that becomes available, and perhaps even internationally, like say the Netherlands. I think that would allow for more flexibility, and especially if there is a bottleneck and a reduction in the number of service centers, that might be a welcome relief for different training programs.

Speaker 1: Thank you. Amy.

Speaker 6: Just adding, uh, that was a really, really great point.

So I just want to second that, uh, to what Anne just said. Uh, there are those of us who travel all around the world to work with, uh, Indigenous tribes, and that doesn't necessarily happen within the state of Oregon, even though the rules can still be adhered to, uh, and taught and championed. Um, having a practicum in real Indigenous settings, I think, uh, would be, uh, a very inclusive inclusive way to back up the, the goals and the initiatives of the state of Oregon to be inclusive by allowing that training to happen not in a licensed service center.

Speaker 1: Thank you.

Speaker 9: Julian?

Speaker 11: Yeah, I think that at least a lot, a lot can be accomplished if the service center does not have to be like affiliated with a school, because I think that lately it has been that the service center has to be affiliated with the school in order to offer a practicum observation place. It, it wasn't the case in the very beginning, and that's why I was involved in some of the practicum, uh, opportunities that were created for, um, for some of the students that were pursuing licensure.

But then that had to change because, uh, there was this requirement that the service center be specifically associated with an approved licensed school.

So I think that a lot of what I am hearing could be accomplished if it at least can be reverted to allowing facilitators within service centers to honoring the, the rules and regulations of the Oregon the OPS to offer these opportunities for students.

Speaker 1: Thank you. Marcie?

Speaker 10: I disagree on that. I do think that practicums should be run by a training program and not just a service center, just to make sure that, you know, they are truly being supervised. I feel like having it go through the training program is our best bet. It feels like a little too chaotic to have service centers run their own practicums.

I do wish there was more flexibility for students to take practicum with a different training program than the one maybe they did their didactic with. We've had multiple inquiries from students about that, and OPS has told us no, whereas in Colorado they can do practicum with any training program that's been approved. It doesn't have to be the one they did didactic with.

So I do wish there was more flexibility in that, but I don't support service centers running their own. practicum because they don't have curriculum.

They haven't been approved in that way. It's a completely separate model.

Speaker 1: Thank you.

Speaker 2: Marlon?

Speaker 7: Yeah, I disagree with some of these comments that are going around about doing practicums outside of the state. Part of what licensing in Oregon is, is understanding the state rules and following them during a licensed session. And when you allow practicums to happen outside of that jurisdiction, they have their own processes and their own rules that they have to abide by for that jurisdiction that they're in. And trying to communicate that back and forth was one of the main reasons that I personally advocated that practicums be done in Oregon and not be allowed to be done outside of the U.S., as they were in the beginning.

So that's still- I still think there is value in having the practicum at a location that has to follow the rules of the locale where that license is going to be offered in. And thank you.

Speaker 1: Thank you. Jade.

Speaker 13: I'm hearing everyone's sides, and I do think that while having a diverse- like going to different states or countries is important, or maybe you should be like a cap of how many hours that would be, um, in terms of like, obviously the majority of your hours, direct hours, would be in Oregon so that you would have the majority of your experience be with how the Oregon jurisdiction follows those rules. But I do still think that there's a lot of value in going elsewhere to get a more broad perspective in that since, I mean, we are moving towards like with LPCs, for instance, like nationalizing the licensure because it is going to be ultimately very similar. in Oregon than another state. Obviously, culturally, there's huge differences and everything, and I think that's why we want to broaden that versus being in a more siloed kind of experience where it's just gonna look very different in a different country. And I think that knowledge is very, very important and not something to be- to look over based on state policies.

Obviously, it's important, and I think we should prioritize different hours towards each category, but I do think that is something that we should look into more.

Speaker 1: Thanks.

Speaker 3: Anne?

Speaker 1: Oh, you're on mute.

Speaker 12: Thank you. I think it's really important to remain flexible at this point in time because we want to keep Oregon attractive to different training centers. And I could see there being a lot of issues with, say, it's like CIS or Berkeley not being able to actually train people in Oregon easily because of the protection around keeping it in Oregon. In jurisdictions like the Netherlands, it's not quite as much of an issue, or I don't know about Peru, but really flexibility is going to be helpful to Oregon in the long run because it's going to keep it more attractive to other stakeholders that are not Oregon-based, and that's good for Oregon.

And in terms of you drawing- keeping the ecosystem running, you want to have more people training in Oregon, you want to have more money coming into it. Uh, and this might keep people from wanting to train or get licensed in Oregon or keep them from actually getting licensed in Oregon.

Speaker 1: Thank you. Lisa.

Speaker 14: I very much think that training programs should be in charge of practicum. They're getting trained to be facilitators, so that's who should be running that. Um, as a training program, we have people from all over the, the country and down in different parts of the world, um, who come to our school, and I really think that training programs should be able to do practicums in places like Colorado, which are state licensed. Would really love clarity around this.

And I really want to be clear is that this program as a whole needs flexibility now, not later, if we really want it to survive.

Speaker 1: Thank you. Julian?

Speaker 11: Yeah, so I want to be compassionate with the people that are associated with training centers because there are lots of costs associated with training centers.

And I understand that there's a need and a desire and an argument about quality. And, um, but I, I'm also compassionate with many of facilitators, not all of the facilitators, uh, like there's a lot of diversity in facilitators. And there are some that have already run training centers, that have already, uh, owned service centers, and that for whatever reason, because of like the difficulties in the field, uh, they haven't been sustainable necessarily, and that are perfectly qualified to offer quality of education, quality of practicum, uh, opportunities and that for many reasons are not going to be able or may not want to pursue again, like, being associated or run their own training centers.

So I don't think necessarily that it has to be a matter of the training center.

Maybe there, there could be like some considerations around who, what kind of facilitators are able to offer practicums, but I think some flexibility could be actually beneficial for the many students from many different places that may want to apprentice.

Speaker 1: Thank you.

Okay, in the interest of time, I think we should probably move on to the next. This is 33.

Speaker 2: Yeah, the next rule is fairly substantial. And we have a break scheduled at 2:30. Is that correct?

Speaker 1: I think that's what it was.

Speaker 6: Yeah.

Speaker 1: We could do 2:40. It depends.

Speaker 2: Okay.

Yeah.

So if we can get through this next rule and then get to a break, that may be a good way to proceed.

Speaker 10: Okay.

Speaker 9: Okay.

Speaker 2: So There's a couple things happening in this rule, so I would like to go through kind of section by section, and then I'll summarize the whole thing, and then we can go discussion section by section. What's on the page right now is pretty easy to summarize. In 5 and 6, there were some dates that have now passed, so they're obsolete. They're being deleted.

This begins substantively in Section 7, and it states that training programs may not make material changes to the curriculum without the Oregon Health Authority's prior written approval. And there is a fee associated with this curriculum change.

So the non-refundable fee is \$500 to change the previously approved curriculum. And in Section 8, we talk about a different set of different types of changes that do not require pre-approval, and those notably include practicum sites.

So what this means effectively is if the training program is modifying their previously approved curriculum, that needs prior approval and it carries a \$500 fee. However, if the only change is to changing the service center identified as a practicum site, that does not require prior approval. And there's a number of changes listed in Section 8 that do not require prior approval, but I called out the practicum site because that is the most substantial.

So I see that folks are queuing up.

So Emily, I was not tracking who had their hand up first.

Speaker 1: I think it's Amy.

Speaker 6: I would just like to put in my comments against charging the schools a fee of \$500 if they need to make changes to their curriculum. And I also want to voice that I don't think it would be necessary for them to identify a training site every single time they do a practicum.

Just feeding off of the comments I made earlier, I think this should be open and available for any site or any facilitator to protect the accessibility and reduce costs and expenses and overregulation initially here on these first 2 points.

Speaker 1: Thank you. Jade?

Speaker 13: Yeah, I just think that the terms like changes is very vague.

Like, what is the parameters of this? A change can be really simple about dates changing or basic rules that are what we're doing right now, like to penalize a training program for updating their program to have more up-to-date stats or whatever. I don't want that to feel like to be penalized for that. And that just seems like we need to really specify what that means and Or honestly get rid of it.

But I just don't like the fact that material changes is very vague. Like, that could be interpreted in many different ways.

Speaker 1: Thank you. Mercy?

Speaker 10: Yeah, I was gonna echo what Jade said. I think material changes is vague to me.

I know it has that qualifying information afterwards. It says that affect the requirements of OAR 310, whatever.

But I don't know what that means. I don't, you know, so for instance, we run both Colorado and Oregon. Colorado has a great requirement for a unit on facilitator self-care that Oregon doesn't require. Well, I would like to offer that to my Oregon students as well.

Does that mean I have to pay \$500 now to be able to offer it? But it's not part of OAR 310 to 3, you know, so I, I just don't know as the program director, what am I supposed to be contacting you about?

You know, so I think, yeah, clarity on that would be very important for all of the training programs.

Speaker 1: Thank you.

Lisa?

Speaker 14: I agree with Amy, Jade, and Marcie on everything they said and clarifying what material changes mean.

Also, I'd love to add in some kind of guaranteed timeline from the authority on how quickly we could hear back. There's a lot on the line as a training program that we have to get in order.

So if we're waiting and waiting and waiting, like, there's nothing we can do. And we have, like, very short timelines for being able to communicate to interested students and interested parties and update materials if we are going to be making changes. Thank you.

Speaker 1: Thank you.

Jade.

Speaker 13: Just something to add is that At least coming from as a community partner who oftentimes would like to work more oftentimes with facilitation centers, I feel like a lot of the trainings and program, like the actual facilitation sites, feel pretty siloed when there is a crisis. And I feel like more training involved with working with said community partners and actually getting more training involved with not necessarily police, but with mental health crisis specialists has been a huge mismatch of maybe sending people home and then saying, well, I didn't know what to say in that moment. Being in crisis, you get, you know, that kind of fight or flight, even with facilitators outside of the typical experience.

And I feel like penalizing someone to add on to this more in-depth, not just what the signs of suicidality are, the warning signs, but what to do when someone is actively suicidal and you don't feel comfortable sending them home.

There's so many ways to consult with state-mandated services that we just don't specify at all. And that deeply concerns me, especially with now adding this non-refundable change fee when I feel like this would be a really great way to reduce hospitalizations or possible risks. And I'd love to talk more about that later.

Obviously, this isn't the place to do it, but I just feel like this is much more of a punitive kind of stance on changing and improving training programs rather than actually tackling, like, how we're going to create more sustainable programs and, yeah, how to make our facilitators more confident in when these- when things don't go right, per se.

Um, so yeah, thank you.

Speaker 8: Thank you. I just want to say, um, I agree with everything that everyone else has said, especially with Jade coming from a behavioral, um, background.

Um, it's very important that we understand these and have more of a mental health, um, input on what's going on, because really that's what this is about. It's about mental health, it's about healing, and I think that's important. And not just restrict ourselves more than what we need to.

Speaker 1: Thank you.

Speaker 12: Amy?

Speaker 6: There's one particular line that I think should be changed.

So this change fee applies regardless of whether a training program requests that the change- requests the change at renewal or during the term of their approval.

So this is Section 7, just advocating that that's that's striked and completely removed.

If to help with costs, given that the number of schools is dwindling, the number of facilitators is dwindling, the number of service centers is dwindling, these costs are rolling downhill. That would be the one loophole. If you're not going to strike the fee from being added or increased in this particular section, then at least give the schools the ability to hold their changes until The loophole being at the time of renewal so that they can just simply pay the renewal fee, which covers the time for all reviewing

versus being sneaky to add in an additional \$500 to charge them. Just give them that loophole and the out to go ahead and make their changes during the renewal period so they're only paying the fee one time.

Speaker 1: Thank you, Allison.

Speaker 5: That was actually my point as well, which was if we want to encourage changes and we want to encourage them on a cadence that we as a, as an organization are able to look at and, and examine, and we know when those are going to come in, then we don't want to penalize having them make those changes. We only want to penalize them doing it sort of off cycle when we don't have the bandwidth to be able to review them appropriately.

And so I think what we want to do with this sort of thing is only use a rule to change behavior that we don't want more of.

And if what we want is continual improvement of our training, we don't want to use this fee as a way of reducing that kind of learning and improvement over time.

And so we want to be able to say, yes, go ahead and make changes when you do your renewals, That's when we're expecting everybody to do that. That's when we have the time and we've built in the space to be able to review it. Don't do it off cycle.

If you do, we're going to charge you \$500.

Speaker 1: Thank you. Sam?

Speaker 4: Yeah, I just want to be on the record in opposition of the nonrefundable change fee of \$500.

It's- I understand why it's here, and just to say it blatantly, and I think other folks within OPS or OHA have said it too, is like they're looking to raise revenue. This is one of the ways, right?

Like, so it's- we can get into the weeds as to like what it means functionally for the program, and that's important. And this is clearly just a, you know, a fee generation to try and raise revenue for the program, which is understandable, but got to be on record against it.

Speaker 1: Thanks.

Speaker 2: Thank you.

Speaker 1: All right, we are at 2:25, which is It's coming up around the halfway mark when we were planning to take a little break. I don't know, Jesse, if we want to try and squeeze in one more before the break, or if you feel like this is a good time.

Speaker 2: I mean, this may be a good time.

This next rule has a fee in it as well.

So I want to make sure that we have enough time and that everyone is able to take a little break and attend to their needs. We had scheduled a 15-minute break, I believe, From 2:30 to 2:45.

Because we're taking that early, let's everybody get back together at 2:40. And the way we normally do this is we'll keep the meeting open, but we will turn off our cameras and mute our microphones. And I see that there's a very helpful break slide, so we will be back together at 2:40.

Speaker 7: Thank you all.

Speaker 11: Thank you.

Speaker 1: Tiidän. All right, we're at 2:40, so we're just calling everyone back to the Zoom meeting for the second half of our meeting this afternoon. We are on Rule 3035.

And we'll just give everyone a few more minutes to get settled back in before Jesse shares any background on this one.

Speaker 2: Okay, we're just going to give it a minute until we see a couple more faces on the camera, and then I see that Marci has a question.

Speaker 10: I was wondering if I could make a comment when we get started about the one right above that, about number 8. I didn't know we were done with that whole section, so that last little bit about notifying within 10 business days.

Speaker 2: Yes, let's start there with Section 8 of 3030.

So I glossed over the 10-business-day requirement when I was summarizing the rule, and I focused on those changes which required preauthorization and those which do not.

So for those changes that do not require preauthorization, Section 8 requires that training programs must notify the authority within 10 business days. And that is similar to a requirement for licensees who make changes that do not require preauthorization.

So please go ahead, Marcie.

Speaker 10: Yeah, I just- within 10 business days of what, I guess, was my question. Like, you know, when my business partner and I are talking about these decisions and we say, okay, we think we're going to have this new practicum site, and then we reach out to someone, and then a decision is made. been made, but practicum is not for another 4 months.

So I'm just a little unclear on in 10 business days of what do I need to- until we've confirmed with them, 10 business days before it happens, you know, what does that look like exactly?

Speaker 1: Thank you. Amy?

Speaker 6: One thing that I was thinking about over the break here is just these medicines have been served for thousands of years. Long before we existed as an organization here in Oregon, and long before there was training schools and things like that.

And so I just want to advocate again for less regulation when it comes to practicum sites within this particular section, not only here but listed earlier, that I don't believe that these schools should be the only ones being able to host or facilitate The, the schools are new, and a lot of the facilitators are actually a lot more trained and educated than a lot of the programs are before they even existed, in fact.

So I do just want to advocate for the, the practicums to exist outside of the school model.

Speaker 1: Thank you.

Speaker 2: Okay, are we ready for 3035?

All right, 3035 goes to curriculum approval.

So in an earlier rule, there was a question about whether that fee was applicable to renewals, and the answer is constructively yes, although they're described in different rules. The fees are identical, and they're both non-refundable.

So, here we have in Section 1 a non-refundable \$1,000 application fee for renewals.

The other change that is proposed in this rule is in Section 2, stating that the training program must promptly provide additional information requested by the authority to determine the merits of their application. I would also note that there is a very small typo in this rule in Section 3 where we say Oregon Health Authority, parenthetical, authority. That should just say authority because the parenthetical is in the prior section.

Speaker 1: Marcie.

Speaker 10: I just wanted to go on record disagreeing with the increased rate, especially for renewal. I actually didn't disagree with the original increase for the first-time applicant because I can imagine that someone going through a new school's entire new curriculum is quite time-consuming. I imagine that takes multiple people or multiple days or weeks, but for renewal, it's like 20 minutes. Like, if you haven't changed anything, or if you have an efficient application process that makes the training program clearly laid out the material changes.

That should not be taking that long. That does not, you know, justify a double increase for something, for a training program that's just like, yep, we're still doing it, we're still doing the same thing.

Okay, check.

So I do have to disagree here with the increased renewal rate.

Speaker 1: Thank you.

Speaker 12: Amy?

Speaker 6: Disagreeing with the renewal rate increase. I would like to either keep it the same, in fact eliminate it entirely.

It's the state of Oregon continues to advocate within equity plans and things like that. Accessibility is number one. And right now our fees are being trickled down to those that actually need these services.

And so my advice is that we remove the increase to this fee and keep this affordable for those that need it.

Speaker 1: Thank you. Sam?

Speaker 4: Yeah, also objecting to the fee increase and the fee in general. For context, for those who haven't been around since The rulemaking started 5 years ago.

This used to be 5 years is how long your curriculum was good for if you do not create any changes.

So this one just feels like insult to injury. Thanks.

Speaker 1: Lisa.

Speaker 14: Just wanted to say for the record, I disagree with the increase of fees.

Speaker 1: Thank you.

Speaker 14: Mercy.

Speaker 10: Also don't love the addition of Section 2 just because of the vague nature of it, that they must promptly provide any additional information.

What does that mean? Is that subjective? It seems obvious, like, yes, we do need to do that. I don't know, I just- more specific language would maybe make it more palatable.

Speaker 1: Thank you.

Allison?

Speaker 5: Yeah, it's the promptly also caught my attention. I made a note when I was reviewing these that, that seemed like it felt like a trap.

I was like, you're gonna need an example or a demonstration or something because it's, it's too vague on that one.

And so, yeah, it caught me off as I was reading it.

Speaker 6: Amy. Just requesting the removal of the language of at least 60 days before being considered timely application if they still have an application and if they Submit the application prior to it expiring, I think, is appropriate, but demanding that someone or an organization submit an application, and this is going to go across the board for all applications, 2 months prior to it actually even expiring, then make that the expiration date.

But it just seems an overstep, overreach, and not necessary.

Speaker 9: Thank you.

Speaker 1: Anything else on this Section 3035 curriculum approval renewal?

Speaker 2: No.

Speaker 1: Oops, okay, shall we move on to the training program recordkeeping?

Speaker 2: Yeah, the proposed edit to recordkeeping is a very simple clarification. Existing text required student attend- record of student attendance for every online and in-person class, and we are proposing to add clarifying language that states that records for each class should include whether that class was online or in person. And these are records that are maintained by the program but would not be required to be submitted to OPS unless requested.

Speaker 14: Lisa, I'm just wondering if anyone can tell me why it matters if they were online or in person.

Speaker 2: We have elsewhere in these rules requirements that a certain percentage of instruction must be delivered in certain ways. In the next rule, if it's not conducted in person, at least 50% needs to be through online synchronous.

So this aids in ensuring compliance with these requirements.

Speaker 14: So there's synchronous and there's asynchronous, which means like live interactive or not live, do it yourself. I feel like those things are a little different than in person and online, and I just don't see the reason for the difference.

Speaker 2: That's all.

Speaker 1: Thank you.

Amy?

Speaker 6: Also voicing that I think this is not needed and should be stricken from the inclusion into the rules. This is an overstep and an overreach. It's irrelevant whether the class was in person or online.

And also, I'm sorry, I just want to add that it also removes accessibility.

Speaker 2: Can you say a little more about how it removes accessibility? This is a recordkeeping requirement.

Speaker 6: Absolutely.

When you have a sort of rule like this where you're making them indicate whether it's online or in-person, it can lead to confusion about what the rules and requirements are about whether something should be online or in-person, and it's just not a necessary rule. There's no physical benefit to the State of Oregon collecting this information, and there shouldn't be any confusion about what the requirements are, and there also should not be a need for it to be in person unless it's like the actual physical practicum.

Speaker 2: Thank you.

Okay, are we ready to move to 3050?

So 3050, um, Is clarifying edits. The dates that are proposed for deletion are obsolete now. And we have also clarified to use consistent language, applicants for training program curriculum approval, in Section 3.

Speaker 13: I don't have any questions regarding what we're redacting because that makes a lot of sense in terms of the dates.

My concern is regarding, what is it, 3G. We kind of skip over 3060, we just go right to 3070, and we're giving hours and sandwiched in between everything that goes into dosing strategies. It's not specified, but when you look into it, It's, you know, sandwiched in between all of that is suicidality, but more just working with challenging behaviors during an admin session. There's no actual discussion about what to do following a, like, a session.

I'm sure each training program has their own curriculum. I just worry that just giving the hours is not really conducive to, like, the full context of what is needed or what is available in Oregon specifically.

And so I know you mentioned earlier, and I apologize, like, if there's a better place for me to mention this or to submit some kind of commentary in that sense, that is not a change in the policy. But I just wanted to put that on record that suicidality is kind of sandwiched between like 4 different other types of training within one subset, which I don't believe leaves enough time for training at all.

But yeah.

Speaker 1: Thank you.

Speaker 9: Hi, I'm just curious where integration training fits within this. Is it within group facility?

Oh, I see it right here.

Sorry, never mind. I was reading too fast. Give thanks.

Speaker 12: Okay.

Speaker 1: Yeah, it's a lot.

Speaker 2: And I would like to add for the group that these modules are defined in more detail in another rule, but that rule was not included in the meeting materials because we're not proposing to make any amendments to that rule.

So that may explain what you're looking for and not seeing.

Speaker 13: I am looking at the training module breakdown. That is not being proposed to change. I wonder where I can suggest changes if not here. Like, is there somewhere else I can suggest that?

Just based on reading through the entirety of the training program core requirements and the breakdown of all of them, I'm just seeing some gaps there personally.

Speaker 9: Okay.

Speaker 2: So procedurally, we're in a fairly narrowly defined space right here. We are here to discuss changes on the changes that the agency has proposed.

For anyone who would like to comment generally on the administration of the program, and, you know, it's not related to the rule changes that we're considering, We have some resources available, including our general inbox where you can provide program information to the program.

We also have annual public listening sessions, which have already concluded for, for this year, and we also have public comment periods, which are available at the tail end of every regularly scheduled Oregon Psilocybin Advisory Board meeting.

So I hope that's helpful, and if we'd like- if you'd like some more detail, we can handle it offline.

Speaker 13: Sounds good.

Thank you.

Speaker 1: Okay, moving on to practicum requirements.

Speaker 10: Yes.

Speaker 2: Yes, thank you.

So we have an obsolete date reference in Section 2, and we have really a companion to something that we discussed earlier in Section 3. This is a clarification that the fee described in the prior rule does not apply when you only- the practicum site is being changed. And in Sections 7 and 8, we are deleting the provisions to alternative practicum because those expired on January 1st, 2026. Finally, in Section 9, we have clarification on what a practicum student may do.

This was discussed earlier. Again, under ORS 475, only a licensed facilitator may provide psilocybin services.

So here we say it directly in our rules that a practicum student may not do that. Additionally, they may not act as a client support person while participating in practicum.

For reference, a client support person could be an interpreter or somebody who is there as an observer or to assist with a medical device. We have a separate rule which outlines client support persons. This is just a clarification that when somebody is a student, they are only acting as a student and not fulfilling other roles.

Speaker 1: Mercy.

Speaker 10: Actually, I have a question that I'm not sure if y'all can answer.

So Colorado has the same legislative hiccup that we do that only licensed facilitators can practice.

So they got around that by having a training license.

So students complete the didactic with us, they get a training license, and then they can practice for practicum.

Is there any conversation happening about that in Oregon? Do y'all know?

Speaker 2: So I cannot speak to Colorado's statutes. We, you know, we, we here in Oregon cannot speak on behalf of another state.

I think it's our understanding that the change you described would, would require a change, a change to Oregon statute.

Speaker 10: Okay, I didn't know if that was just regulatory, that was like their, the way they got around it. My actual comment, I guess it's about Section 8, I guess, all of practicum having to happen in person.

So the way our program runs practicum, we find real clients for our students to observe.

We find that that's more authentic than them observing each other, right?

Um, and so the- those clients are often from out of state though. They're flying in for our practicum from Florida, New Jersey, New, you know, New Mexico. Most of their preparation sessions are online on Zoom.

And so we want our students to get credit. They are already doing it. We just don't give them hours for it because it's not- it doesn't meet the regulations. But we want them to get the hours for observing the licensed facilitator leading the preparation session on Zoom, but that technically doesn't fit this definition because it's not in person.

It is live, but it's not in person.

So I'm wondering if we can change some of that language to say synchronously or something that makes it a little bit more flexible. It's the best authentic version we can give them when all they can do is observe, but we feel like our hands are tied a little bit and we can't give them hours for that based on this language.

Speaker 1: Thank you.

Speaker 14: Allison?

Speaker 5: Yeah, I was really struck and struggling, um, and again, I'm coming from a clinical training in clinical psychology, so that's my frame, um, but this idea of direct practice that is just observational makes zero sense to me. This is not direct practice. Direct practice would be that I am actually doing the work under the supervision of someone who has their license, and that I'm allowed to practice, hence practicum, the work that I've been trained in.

So we're skipping like this whole weird step where we've decided that observational is enough, and then you can go and figure out and get your license before you have actually been able to do it.

So if we're looking at it from a safety standpoint, I don't understand direct practice as described only as observational. And then the second piece to this, which, which reinforced to me that this isn't direct practice, is that hitherto the thing that has been taken out is that we were able to do direct practice, quote unquote, or observation by simply watching video or watching simulations. And if up to this point that's been considered a practicum, and now that's no longer true, but now we've got this middle bit where we're saying you can observe, but it has to be in person.

I'm very confused about the additional requirement that we're offering in terms of the steps that somebody has to go through. It has to be in person, it has to be on site, but they can't actually do anything but watch.

So we've made it harder, but we haven't actually given them any actual benefit to their education by having them be in the room.

So I'm really confused about What we're trying to get from this.

So if you're observing, then that's one thing, and that's what we call a practicum, and it's an observational practice, and that's what we're defining. And then I think it would make sense if we did have alternative ways to being able to get that without it being in the room, or we actually go and say, no, this is direct practice. And direct practice means that you're actually behaving like you will when you're a real facilitator. We've given you all the tools and the opportunity to be able to do that safely with the people who are going to help you do that, so that when you leave this after practicum, we believe that you meet all of the requirements to do the work as a trained facilitator.

So this whole section really confused me because I don't know what we're trying to accomplish with these rules. I don't think it's helping students. I don't think it's making anything more accessible. And I really think that we are misusing the term direct practice.

Speaker 1: Thank you. Ann?

Speaker 12: Thank you.

I also, I just want to reiterate that I- the word direct practice is very confusing for somebody who's, who's not a psychologist.

I don't know what it means here, and it- and that word direct keeps getting used, so it would be really great to explain what's required.

And also, like, for example, how many of those 40 hours need to be during an actual psilocybin session versus preparation and integration? Could the 40- like, as somebody who needs to think about this stuff, it's just very unclear what's actually required in the practicum. Uh, and the more you can do, that's actually what it's like in real life, and a lot of preparation and integration happens remotely, I think the better.

Speaker 6: So.

Speaker 1: Thank you.

Speaker 6: Amy. Besides being a military veteran and a licensed psilocybin facilitator, back in the day I got my nail license through the state of Oregon, and when I did a practicum, I physically did the person's nails underneath the guidance of a licensed school and a licensed nail technician.

So something as silly as getting your fingernails painted, you know, I was able to physically put my hands on a real client, and that was my practicum that met the regulation standards for an Oregon Health Authority license to be issued to me.

And so in this case, when we're literally dealing with an individual who is in an altered state and we're leaning on the Indigenous wisdom of thousands of years before we even existed as an organization, The shamans and the medicine men and women, the carriers, they trained physically hands-on by being in ceremony with those going through the experience live, hands on the medicine, hands on the person, hands in the experience.

And so if we are going to be expecting to create and educate excellent psilocybin facilitators to be at the highest caliber, them having hands-on practical experience is going to be a must.

So removing barriers to entry for them to be able to do it is so important for us.

It is our duty and our responsibility as the state of Oregon psilocybin facilitation regulation model that's being followed not just here in the United States but around the world that we're removing barriers to entry so people can actually get their hands on the actual experience itself. And I also want to just to add here, one additional factor I think is really key is to put back alternative measures.

So just like, gosh, who was it that was saying it earlier, the ability to give credit for online hours and Zoom calls for preparation and integration calls, because that's half the battle. More than half of my clients, I'm a very successful, very busy psilocybin facilitator here in Oregon, Half of my time is spent on Zoom calls with clients, preparing them, and then providing integration services after.

So students absolutely need to have the ability to get credit where credit is due, being part of those incredible and essential hours spent with clients on the phone or on virtual calls, and they need to get credit for that.

So I do want to champion all this red line strike stuff that has been removed for alternative ways to get credit. get practical hours of experience, put it back. Because the, uh, the- in order for us to train people appropriately, again, remove barriers to entry, stop making this so complicated, and allow them to actually get hands-on experience from the moment they make initial contact with the client virtually to the time they're getting in person. We need to be able to bring some of that Indigenous wisdom back to this, uh, this program that we have.

Period.

Speaker 1: Thank you. Lisa.

Speaker 14: Um, I wanted to go off of what Allison was saying earlier and just clarify something that does not make sense to me.

It just seems very backwards and very fear-based. If we really want students to know how to do forms, how to work with clients, how to facilitate, but they don't actually ever get to practice facilitating overseen by licensed facilitators, Um, we just ask them to sit in a corner all day long and stare at everybody, um, while the other licensed facilitators are doing the work. And then we ask them to take a test and put them in the field, and then we expect them to know how to do everything. It just makes no sense.

Um, also, if you, if you Google, I know we have a definition for practicum, just when anybody looks online in Google, like, what is a practicum? Defined as a supervised course that allows students to apply classroom theories to a real-world professional setting. And it emphasizes hands-on experience, observation, and skill development. And we're also requiring, um, practicum supervisors to oversee.

Like, what are they overseeing if everyone's just sitting in a corner? Just saying. Thank you.

Speaker 1: Thank you.

Anaka?

Speaker 9: Blessings. Yes, I'm here to affirm that practicum should include assisting facilitators that are Licensed. In our traditional ways, you always just assist your teachers.

And honestly, even seeing hours is kind of funny to me because I'm like, I don't even know how many hours I've trained. Like, I've never even counted it. It really just happened where I was just assisting and learning until my teacher and I felt like I was ready.

So, I know that we have to write it down because we have to write it down.

But I think in terms of actually practicing, even being an acupuncture student right now, getting my license in acupuncture, we always have a period where we're observing, and then we have a period where we're actually practicing with the doctors overseeing us practicing.

So it would be nice if there was an observation period and then a practical period where you were actually assisting. And I would say, as someone who has facilitated in these spaces, we need assistance, and we need those people who, you know, are doing the parts of the job that is not like the conductor of ceremony, or however you would- Yeah, sorry, I'm still learning how to like- I'm just going to be talking from a decolonized space.

But anyway, I just- I'm also agreeing that it seems like taking away observation will not create confidence in folks who are getting their facilitation.

It may in fact create a space where people are just focused on finishing really fast and not actually being intentional during these hours so they can actually get their hands on doing ceremony.

Also, I just want to encourage, you know, creating a space where people can actually have a relationship with with their facilitation training leaders to, yeah, like, have that one-on-one relationship with your teachers, for each person's hours to maybe be longer. Like, I know some facilitators who took a lot longer than just these hours to actually feel ready to lead.

So, yeah, just going deeper into, like, what leadership actually means.

I know that this is, like-

Speaker 3: Yeah.

Speaker 9: Yeah, just, just thinking about like actual who's ready and who's not, and having that actually be a relationship-based model instead of just like focusing on hours and paperwork and all the things. Um, I know that wasn't as graceful as I could have said it, but that's, that's what I mean. Thank you.

Speaker 1: Thank you. Chris?

Speaker 8: I just kind of want to, you know, play off what everyone else has said. I agree with everything that you guys have said, but also coming from just finishing facilitator training, what I've noticed is not just myself, because, you know, I've had other trainings, like it's been brought up nails before.

I've gone to, as you know, cosmetology school to be an esthetician. We have more time not just observing but practicing. And that's so important because as a facilitator, um, being with somebody with their healing journey, creating a safe place um, a safe container. We're not doing that by allowing people to be unprepared on how to facilitate.

My other classmates have concerns. They graduated, but they're like, I don't feel prepared. I don't know what I'm doing. There's too much left unsaid and unseen for them to come in and actually help not cause harm.

And I think they're afraid they're going to cause harm because they're not prepared to hold that space for people. And this is more than doing nails or skincare. Thank you.

Speaker 1: Thank you.

Jade?

Speaker 13: To offer some kind of solution in terms of- I mean, I agree with everyone. I think hands-on practice is the best way to gain more confidence and understanding and your own skill set and what you need to work on as a facilitator.

When someone's going through a screening process, if there's a way to at least, you know, designate maybe like lower risk clients to higher risk, because I mean, as someone who works with mental health crisis, like someone's higher risk and they have more acuity, then I'm going to let my supervisor or someone else take that case.

Whereas if it's someone who might have already had other experiences with psilocybin, they're maybe lower in terms of that risk of mental health. Like, there should be a way to kind of gauge that because like everyone else is saying, like, without that hands-on experience, you really don't know what you are, you know, you might have the license, but without that actual one-on-one physical, like, interaction, like, you're not going to know if this is for you. And that to me just seems like a shame.

So yeah, that was just my solution.

Like, some kind of solution would be to allow people to practice when it's designated as like a lower risk client or maybe a lower dose. I'm not sure, but that's just something I wanted to throw in there.

Speaker 9: Thank you.

Speaker 10: Anne?

Speaker 12: I also did- I think it's important to recognize that most of the practicums as they exist right now are in groups, and it's very odd that- but the majority of experiences don't happen in groups, and there's something just very strange about the way the power dynamics and the amount of people in the room, how that plays out in a situation where people are just observing, it's very odd. And it's also, I mean, I know that schools, it's part of their business model to do this, but where it comes to the participant themselves, like, I don't think they want extra people in the room doing nothing, right? I think they often want somebody there that they know and they trust who's not just there to observe. And it's just, it's a relational problem, I think, that is put in place by a practicum with these kinds of rules around it.

I know I'm not offering solutions, but this needs to be more relational and relationally minded than I think we're thinking of it as being. And that student and the apprentice needs to have a relationship with the instructor and also with the participant in a way that might require maybe more engagement than just somebody simply observing.

Speaker 1: Thank you. Macy?

Speaker 10: I just wanted to mention for maybe people who weren't around when this change happened, OPS and OHA want us to do practicum. Like, practicum was written in like a real practicum kind of way. Like, that's how the regulations were originally. And then they got pushback because the legislation says only licensed facilitators can facilitate, and students are not licensed facilitators.

So, you know, I know that everyone at OHA and everyone at OPS, their heart is in the right place. They wanted us to be able to do that.

And some legislator who didn't want this happening said, oh, no, no, no, we said- So Colorado, like, has a system for that though, right? Like, having a training license means that then a licensed facilitator.

It's a training license, but it's a license that they can practice.

So I just hope we look at other states' models, that we're willing to say, hey, maybe we don't have it all figured out. Because as you guys have kind of hinted at, we are putting people out into the field that actually- I don't actually know if they're qualified. There's no way for me to not give the certificate to a student who observed for 40 hours if that's what they did.

I have have to say check, whereas in Colorado we do not give a certificate to everyone who goes through practicum because some of them clearly demonstrate they are not ready, and we say, I'm sorry, you have not met these standards. There's no way for me to do that ethically in Oregon, and so we have to just give them their certificate. It's, it's, it's hard to swallow as a program director, um, so I really hope that we are willing to look at other options and say, okay, you know what, a training license is a license, And so if they can get that first and then do practicum, it's another step. It's maybe more paperwork for OBS.

I don't want to put that burden on them, but it feels unethical sometimes signing paperwork for someone where I'm like, well, they passed the tests and they completed the hours, so what else am I going to do?

Um, so just want to make sure people are aware that that is how it goes when all they have to do is watch.

Speaker 1: Thank you. Julian.

Speaker 11: Hey, I would like to make a distinction here and raise a question to the field, let's say. On the one hand, I hear that there is an interest in, like, having hands-on experience in referencing traditional setting training. And to what extent the trainings in Oregon should also be more flexible and more inclusive and capable of accommodating hands-on experiences and so on. But I think that that brings conflict a little bit or raises questions about how facilitation per se is defined.

In a traditional setting, I want to say, usually you apprentice for many years, and the training to get licensed in Oregon is a few months training. I think that it is okay, and that is, it is important, but it is also relevant to distinguish what you can accomplish in a few months months and what you can accomplish in like 10 years, 15 years, 20 years of apprenticing.

So I see many of the people that graduate- I can understand that some people graduate and they wonder what they are actually capable of. And, um, and I see also many people graduating wanting to deepen their training and going, for example, for indigenous traditions, apprenticeship, and so on.

So I think that there's no perfect solution. I think that the training as it is created right now can accomplish what it can accomplish. People that become licensed I think that it is a minimum requirement of what you're able to do. It is not like a top true mastery, higher standards of training, and now you can facilitate and now you can do things that indigenous people can do.

So just for the consideration of the changes of what we're actually doing in the practicum and so on.

Speaker 1: Thank you.

Speaker 7: Amy.

Speaker 6: I just hadn't heard it mentioned, so I just wanted to, for the record, since there's been a lot of conversation about mental health aspect to these, to the use of psilocybin, I just want to be a really clear advocate that mental health is only one reason why people will use psilocybin journeys and why they come to this medicine, that it is absolutely by far not the only reason, and so as we're considering the rule changes, just keep in mind that mental health is just one of a whole sea of reasons why people use this.

Sometimes people just use it just because they want to, and I just want to, want to keep that at the forefront of our consideration, our conversation as we're talking about rules and training and facilitation, that mental health is not the only reason that people will use psilocybin, and then coming back to working particularly on this section of the rules, the 8 that is struck, I just propose that that's put back.

Speaker 1: Thank you. Lisa?

Speaker 14: I wanted to say I agreed with Marcie on the training license idea, really not trying to add more financial barriers to the process, just really trying to make things make sense in the reality of how it's really done and how we as a community see it being needed to be done.

You know, OPS could potentially create a training license pathway, or maybe it's an apprenticeship license, like something that would actually align with the legality and all the challenges around like what they can and cannot do. And I think it also allows for a mindset of like, I am practicing. Because we do kind of like, once someone graduates, like they're, and they get their license, they're just kind of out there. And I do think that everyone needs more practice.

And I also just want to name like everything we do, I would love us to have longevity in mind if we really want this program to be successful. How are we making this better for the long term so that we're not encouraging people to just go underground because it's easier?

Speaker 1: Thanks. Thank you.

Allison.

Speaker 5: I think just reacting a bit to some of the things that Marcie said, which I appreciated hearing some of the history, is that, you know, if we legally currently can't change practicum to be actual direct practice, as the law won't allow us until we do something else with like a training license, then I would advocate that we think about the alternative of practicum options that had been here, so that it isn't just the on-site and watching, you know, in a group session kind of weirdness that we've created with these rules. I think the being creative within the rule, where I want to move us, I think, Lisa, as you said, towards the longevity and the way we want to do this in the future, but that requires a level of redesign of the actual law. then in this case, then I would advocate in these rules to not completely throw out alternative practicum ideas and think about ways in which we can make it more useful but also less of a challenging experience. If observation is the only option, let's then look at the ways in which we can do that and give credit for the ways in which people are participating in the observation that they're doing, and that it doesn't necessarily have to be on-site in person.

I just think that we have made a rule level that doesn't make a lot of sense for the kind of training that we're actually requiring that people get. If we're going to go to that level of rigor, then we need to bring the whole thing up and have an actual direct training license. this doesn't split the middle well. We're increasing the requirements without actually increasing the benefit.

And so I would advocate that we return to some of these alternative practicum options.

Speaker 1: Thank you. And I think we have time for the 2 remaining hands here that we have raised. Chris?

Speaker 8: No, I want to apologize because I was away for a moment when Marcie was talking.

But if I understood correctly, my take from what I did here was- For an example, if I go to school to become a nurse or a CNA or anything of that sort, or even, you know, my psychology degree, I have people that I can follow and do. If we're going to do a training license and create more fees and more pathways, I don't necessarily know that that's correct either. I think the way we have things written, I agree with what Allison was saying and whoever else was agreeing to, we need to put the alternative back. Otherwise, I also don't agree with doing the training program the way that we're thinking about it either, because it creates more of a moneymaker, and this should not be a moneymaker.

And, you know, it's healing disguised as making money. And that's just my opinion. I think it causes more harm than it does anything. And that's all I want to say because I know we got to get going on.

Speaker 1: Thank you, Anaka.

Speaker 14: Bless up.

Speaker 9: So one other thing I just wanted to add is, um, a huge part of my My experience with my teachers has been actually experiencing as a participant.

So I'm just wondering if we could possibly add hours of people actually sitting as participants in as well so they can actually experience the medicine.

Because honestly, most of my training with my people, I'm sitting- like the first 2 years I was just sitting. And then the next 2 to 3 years is when I actually got to sing, and then maybe another 2 more years until I was actually serving.

So it- like Master Julian said, you know, it's like it takes years to even get, and you kind of have to earn it, you know what I mean?

So I know it may not be perfectly like that, but I would like to propose adding in being a participant to actually experience the experience.

So then folks who are giving also know that feeling, because traditionally you're supposed to take medicine more than you give it. That's just kind of a baseline.

So, yes, thank you.

Speaker 1: I'll let Jesse respond.

Thanks.

Speaker 2: Yeah, yeah.

So I'm going to just kind of summarize briefly some of these comments and then move us on to the next rule, starting with Anaka's comment. A couple years ago, this rule was amended. to allow for participants to receive some limited credit, and that is the last sentence in what is now Section 7.

It's kind of buried in there with all the red lines. It says students may receive up to 4 hours of credit for participating in an administration session.

Speaker 9: Thank you.

Sorry, I didn't see that.

Speaker 2: Yeah, like I said, it's buried, and maybe your comment is that it should be more than 4 hours. But that is in there.

Also, you know, just to kind of summarize the larger conversation, you know, to the extent that these rules use language that is imprecise or inaccurate, that's something that we can look at addressing. But to the extent that, you know, this committee is requesting things that we're not authorized to do under the statute, You know, we've received your comments and that's really all we can do.

Speaker 1: Right, on to the continuing facilitator education.

Speaker 2: Okay. In this rule, we're going to see what is mostly some very technical edits. We are removing obsolete date references.

We are making the changes to reference a specific form rather than saying form and manner, and we're doing that in several places. The only other change is in 3B, where we were referring to organizations or conferences that have been approved. We are clarifying that we mean approved by a professional licensing body.

So in other words, if there is a continuing education that is, you know, approved by OMB, Oregon Medical Board, for example, that could fall in under 3B if it is relevant to psilocybin services.

Speaker 4: Amy.

Speaker 1: Oops.

Speaker 2: Oh, you're on mute.

Speaker 6: Yeah, I can't do it.

Okay, I'm having a hard time. I just want to advocate we are way too far brand new in the United States. We have 2 states where this is legal, and this greatly limits our options for continuing an education if it has to be somewhere that is licensed or recognized by the state of Oregon or by Colorado. Um, there are- cost is going to continue to be the number one factor I care about right now.

Um, there's just not enough resources, there's not enough training programs, there's not enough, you know, fill in the blank.

And so us being pioneers in this space globally, uh, there's really limited resources that you guys, specifically Oregon and Colorado, have as approved and licensed. And then there's a premium fee associated with those things. There are millions of ways to have continuing education, and sometimes it's free outside of the US, in other states, in other programs, and other models.

And so I think because this is, again, still a thing that has been around for thousands and thousands of years, and this is a brand new entity and organization, that we remove it having to be a professional licensing body. It is not the time or space to be entering that in. There is not enough resources. Recognized by the state of Oregon or Colorado, and we need to remove regulation on this and increase accessibility for facilitators to continue their education in other avenues that are not just the ones recognized.

If you look at the list of schools and governing bodies that are recognized, it's a very small list, a tiny list, and having been through a lot of those organizations sites, and experiences within the last 12 months myself, the costs are outrageous. And again, those costs trickle and roll downhill to our clients who are trying to get access to these services.

And so allowing us to expand our education beyond what is currently available today, which is a really small and expensive list, I just could not be a louder voice to ask you to remove that it has to be by a professional licensing body.

Speaker 1: Thank you.

Marcie.

Speaker 10: Uh, my understanding is not that it had to be that. The training programs would obviously just be Colorado or, well, probably just Oregon, uh, but a professional license body could be anywhere.

So like if they're a counselor, you know, organization and they're, they're allowed by the- or my- someone mentioned acupuncture.

My husband's an acupuncturist as well. They have a licensing body.

And so if they did something about mental health, if they did something about suicidal ideation, if they did something about de-escalation techniques, it didn't have to be Colorado or Oregon as long as it was still related to the core curriculum. That's important, but then it does not have to be inside of one of those 2 states.

Speaker 2: And I just wanted, before we get to Sam real quick, I just wanted to offer a clarification in that the training, the rule does not require training to be offered by the professional licensing body. It requires the training to be certified by the professional licensing body.

So this could be a private organization. Other professions have different models for approving trainings.

So if it is approved under that model, then it essentially- we're piggybacking on that approval in this rule and allowing it to be applicable to psilocybin training as long as it's relevant to psilocybin.

So thank you for giving me the space to, to offer that clarification.

Speaker 1: Go ahead, Sam.

Speaker 4: Yeah, I- thanks, Jesse.

That's what I was thinking too. This actually adds more options for more potential CE credits. My understanding is probably based on House Bill 4040 that recently passed, which now allows a licensed facilitator who is also a licensed therapist, for example, That if you have CE credits on the therapist side that are adjacent or relative to psilocybin, that that could somehow be included in this. It expands, it doesn't contract, I think.

And maybe Jesse can confirm whether or not my understanding that is correct, but that's how I was reading it.

Speaker 2: Yeah, I think it's most accurate to portray this as neither an expansion nor a contraction. It's, it's simply a clarification of what's already there.

Speaker 1: Yeah, and that it's not approved by OPS but approved by any professional licensing body.

Speaker 12: Anne? I might just suggest putting in an or after authority so that it's clear that it's not both and, because it doesn't read clearly right now.

Also, I wonder if other professional organizations like, like I'm a lawyer, would, would a psilocybin training curriculum around law qualify? It's, there's a lot of different organizations that will be asking questions like that, and I don't know if you, if you've thought about those kinds of organizations beyond mental health and other adjacent healthcare licensing bodies, but you should.

Speaker 1: Go ahead, Jesse.

Speaker 2: Yeah, I mean, the text of the rule would allow, you know, training that was authorized by a state bar or any other professional credentialing organization.

So it does not have to be limited to healthcare or behavioral health or mental health.

Speaker 1: And just kind of tying it back to number 2, that the education must consist list of skills or knowledge relevant to the core curriculum?

Speaker 9: Amy?

Speaker 6: Yeah, all of that said, I just want to clarify, I still am vehemently against the inclusion of this. That because, I mean, there's a lot of us that are not clinical or dual licensed and things like that. We're just simply facilitators that are focused on the psychedelic component of this and get our training and our education from methods that have existed long before 1776.

And so I just want to emphasize that I really think that facilitators should be able to get their education from outside of the structured, governed model that exists today.

Speaker 1: Thank you. I see Lisa, your hand is up.

Speaker 14: Yeah, I guess I feel unattached to the addition of the professional licensing body.

I appreciate the clarification.

I also wanted to give some perspective of students are really struggling to like claw at where do I get my CEs, and they're really confused. And, you know, if there's a requirement by OPS to have this, it would be really helpful.

I know y'all are busy, to have some kind of collaborative, like, here's what we know, like some kind of directory or something, or you can submit your classes.

I know that DORA has that in Colorado somewhere over there.

So just a recommendation on the realities of this from the student perspective.

Speaker 4: Thanks.

Speaker 2: So in the interest of time, I'd like to move us on to the next rule.

So we have some very minor edits about the form and manner, but the substantive edit here is in 3K.

So Sam was referring to recent legislation in the prior rule, and this rule addresses that recent legislation directly.

So under House Bill 4040, beginning January 1st, 2027, individuals that complete psilocybin facilitator training programs that have been approved by other states may now apply for facilitator licenses in Oregon, as long as OPS determines that that curriculum meets or exceeds the Oregon requirements.

So, what this rule text does is it documents OPS determination that training programs approved by Colorado's Department of Regulatory Affairs at the time the applicant has received and completed their training will be determined to meet or exceed the Oregon requirements and would be considered valid training for applicants for an Oregon facilitator license.

Speaker 1: Lisa?

Speaker 14: At first glance, I personally love this. I think it makes sense. Reciprocity needs to happen, and Colorado has already offered some, some of that in a very difficult way.

But however it happens, and it's clear how students can transfer their credits or whoever's gonna manage that, I don't know if it's gonna fall on training programs or if it's gonna fall on OPS to figure it out. Whatever. I support reciprocity.

Speaker 6: Thanks.

Speaker 1: Thank you. Mercy.

Speaker 10: I also fully support reciprocity. They have it with Oregon as well, and that makes it really great for our students.

However, this language I feel like is not specific enough because they have 2 separate parts of training.

So they first get 150 hours of didactic, then they get their training license, then they get their practicum and have to do consultation hours, and then they can apply for licensure.

So this It doesn't specify, I mean, if someone with only 150 hours of didactic applies, well, they have completed a training program. They will have a certificate from us, but they won't have done practicum yet.

And so I think the language needs to specify that they must have completed didactic and practicum in order to qualify for licensure in Oregon. Otherwise, they're getting around practicum entirely if their didactic certificate is enough.

So, So just being really specific about that in the language.

Speaker 1: Thank you.

Speaker 6: Just voicing that I'm in favor of the reciprocity here. The one thing I would love to flag, though, is because it does specify Colorado, can we particularly- sorry, can we in particular modify the section with Colorado just to be clear that any other

state that is willing to be inclusive as there, as additional states come online. New Mexico, I know, is coming up here pretty quick, etc. So I would just love to expand this to be more inclusive of additional states as they legalize.

Speaker 2: Yeah, I'd like to address that comment really briefly before we move to the next one.

The enabling legislation requires us to make a determination regarding regarding the other training programs. And because no other training programs currently exist, we were only able to evaluate Colorado.

So the statute requires OPS to make a case-by-case determination for other states.

So that's the reason that it looks the way that it looks.

Speaker 6: There are schools already applying for New Mexico.

So one of my suggestions would be any schools that currently exist is licensed in the state of Oregon, that maybe there's a fast track for those schools that are applying for those other states, because we already know that they're going to be well structured.

Speaker 7: Thank you.

Speaker 1: Lisa.

Speaker 14: I agree with what Amy is saying.

Somehow, some way, keeping the door open for other states, because there will be other ones coming along.

We know what New Mexico is coming, but like, how can we keep the door open for this particular- I understand the reason why it says Colorado, and I totally get that. I don't want to lose this though.

I think that this could easily get lost in a mess of other things, and I really just want to keep the door open for other states. Thanks.

Speaker 1: Alright, let's see. We're at 3:42.

We have a little bit more time together before we call it a day this afternoon.

Speaker 2: Yeah, I think 4010, maybe quick.

Speaker 6: Yep.

Speaker 2: And then 4060 is where all the license fees live.

So, you know, let's just maybe go as far as we can go, and we may need to pick up in the middle of 4060 when we reconvene tomorrow.

So 4010 is communication with Oregon Health Authority. I previewed this when I was talking about form and manner earlier in the meeting. We are going to tell you when the form- this is the new Section 5, Forms published on the website described in these rules are published to a URL which is not yet included but will be included by the time we file this rule.

Speaker 7: Marlon? Just from my limited exposure to the OPS website. I've tried to be there a lot, but I still find something new every day. Having a single website that is all forms inclusive, not having them divide up for the Service Center or the other place or the, you know, all these different places, having a single website would be my recommendation to allow for a one-stop shop for looking for forms on your Thank you.

Speaker 1: Thank you.

Speaker 2: Okay, are we ready to move to 4060?

So 4060 is the rule that contains the majority of the fee increases that are proposed for 2026, and I'm just going to give kind of a structural orientation before we open it up for comments.

So the fees are increased in 1A, the nonrefundable application fee.

In 2A through E, the annual license fees, and I would note that the annual license fees for laboratories do not come online until January- are not proposed to come online until January 1st, 2029. All of the strikethrough text that you see, which was the former Section Sections 3, 4, and 5 are effectively the elimination of reduced license fees. And what is now Sections 3 and 4 cover the non-refundable change fee when an additional applicant is added to an application or a license. And Section 4 is the nonrefundable change fee.

When an inspection is required due to a change of location or modification of the premises, that inspection fee does not apply to routine renewal inspections or inspections that are required when surrendering a license. Yes, please go ahead.

Speaker 4: I just want to invite my RAC members to join me in a unanimous objection to all licensing fees, just to see if we're- if we can do it.

So if you are in favor of the motion of rejecting any changes to licensing fees, That's, that's my question.

I'm just kind of curious if we can get unanimous. I don't know exactly how the- our meeting hosts want to count that or not, but there's a lot of hands that are up.

So I just wanted to see if we were able to get a unanimous vote on that. Thanks.

Speaker 2: We don't typically take votes during a RAC, but if I can assume that everyone who has raised their hand is in concurrence with Sam's statement, you know, I'll record that in the notes. And then, you know, if we all want to call that recorded, and then you can raise your hand and lower your hand and re-raise it if you have- a unique comment additional to concurring with Sam.

Speaker 4: Thanks, Jesse.

Speaker 1: Okay, I see Amy's hand is still raised.

Speaker 6: Yeah, so I have a lot to say here, but I'm going to try to keep it really brief. Doubling fees, you are going to cripple our state. You're going to cripple our industry. These fees, as I've been expressing this entire call, roll downhill to the clients, and it's already extremely expensive to access these services as it is because of the fees.

In most buildings, it's like \$800 just for the person to sit, and that doesn't even go to the facilitator.

So it is extremely expensive as it is, and you're going to cripple our state. The other thing I wanted to mention is about reduced licenses. I'm a military veteran.

I submitted a DD-214. I got a reduced fee license. when I was first licensed, and that enabled me to become licensed because it was already so expensive to pay for the school on top of the licensing fees that go to the state that you have to pay, you know, 6 to 10 grand or more just to get the training that's required.

So you are crippling people's ability to get licensed in the first place. It was because of the reduced licensing fees that I was able to become licensed here as a military veteran, and the majority of people I serve About 85 to 90% are military veterans and first responders that need, that truly benefit from having somebody who is already from their particular background that has had the same experiences overseas in war zones and things that they have.

So I just want to be a loud pot-banging person over here about keeping reduced fees on the table outside of just military veterans. Again, one of the things that you guys have in the curriculum requirements is education on culture dynamics and diversity and inclusion and all of these other things. But then seeing rules like this directly conflicts with what you are trying to advocate for.

And so I just encourage you to put back the reduced fees and the accessibility for other unique backgrounds such as mine being a military veteran.

We do need those reduced fees. Our salary and our pay is public record, and it's not very much.

And so us being able to access these modalities when we leave the service at a reduced fee is so critical to us being able to serve the population that needs these the most. The military veteran community is leading the charge nationwide right now for accessibility.

It's one of the reasons that President Trump just signed the executive order he did for psychedelic access nationwide. And this would be a slap in the face to the groups, the military veterans that have been fighting on the front lines to get accessibility, not just in Oregon or Colorado, but in every single state across the United States federally to advance access for these services.

So I'm just- I don't know what else I could say. I could go on and on and on about how wrong it is to remove the reduced fee for military veterans, but also for other groups that qualify on the current list of standards for them to be eligible for that, but then also doubling the manufacturer, the service center, the facilitator licenses to \$20,000.

You are absolutely all- I can think of already 5 or 6 organizations that would shut down right now and probably will not renew. We already have a renewal crisis in the state of Oregon, and it's because of the costs already being so expensive.

So to double it to \$20,000, we will- our whole industry will shut down.

So I'm sure there's a lot of other voices, see a lot of other hands.

So I'll just put a period in there for now. But this is crazy. You can't do this.

Speaker 2: And I see that we have a lot of hands, and I also want to be respectful of time.

We have 8 minutes left.

So we're going to take 8 more minutes of comments, and then we're going to pick back up tomorrow at this same rule.

Speaker 1: Sounds like a plan. Lisa.

Speaker 14: I just want to say I strongly oppose the proposed increase in license fees. Um, I definitely am an eternal optimist and fully support the legal model, and I hate to be a bummer, but it really feels like funeral preparation for the Oregon Psilocybin Services Section, and not just because it's merging. I really feel like everyone is going to go underground and that this will float away and this will all be a memory if we don't find ways to make this affordable and functional. Thank you.

Speaker 1: Thank you. Marcy?

Speaker 10: Yeah, 100% what Lisa said. This is going to push people underground.

We have students- we have direct contact with students and direct contact with service centers. We have students who finish our program and never get licensed. And they tell us that because it's too expensive and we have service centers who are closing, ones that we had great relationships, you know, 3 years ago. They can't make ends meet.

And all this is going to do is make that worse.

And so this, all this is going to do is to promote illegal underground non-regulated use of psilocybin. And the goal of this, of this organization, I know that they need money.

I know that they are fee-based.

I respect that. But \$20,000 for service centers, even \$4,000 for a facilitator, is, is gonna have the opposite effect of what you want. You're gonna get fewer applicants because you increase the price.

So you're not getting more money, you're getting less because fewer people are applying.

And I hope someone is doing that math of who's actually sticking around, who's actually gonna get renewed, because I don't think it's what they think it will be.

Speaker 1: Thank you, Chris.

Speaker 8: I just have to reiterate what everyone else says. I vehemently oppose the fee increase.

And just with my life experience and having 2 sessions in a service center, had I not had people advocating for my healing because I had a mental breakdown, lost my job, everything, I would not have been able to heal. And it was my- sorry, give me a second. It was my last hope, and I know it's the same for first responders. I didn't have the money to go if people hadn't put money towards me and believed in me and my healing.

I don't know where I'd be today, and a lot of my clients are in the same spot. And if we increase the fees, that's gonna hamper, hamper where we're at. And I want this to stay around. I understand it's fee-based, but again, like Marcy said, if we do it- if we- the thing is, if we lower the fees, we get more people in.

It's, it's based on volume. You'll make more money on volume than you will on increasing fees, and that's in a service-based industry. And I don't know of anybody now that I can't read my notes.

Sorry, guys.

Um, was there an economic impact analysis even completed before you guys thought about, or legislative people thought about increasing the fees?

You know, and I don't want this to go away because I think this is a fantastic program.

So I just want, want to reiterate what everyone else said, is it's just so important for healing. And I myself didn't get my licensing because I'm on disability still trying to heal, and I can't afford even the thousand dollars.

So I'm staying unlicensed until I can figure something out. Thank you. Thank you.

Speaker 13: I just wanted to say that increasing the fees is just going to exacerbate the psychedelic exceptionalism that we're facing in Oregon in terms of.

It's just going to gatekeep those who can afford it to those who can't, and those who can't are going to find other ways to cope with the stressors of life. And as someone who helps serve people who are self-medicating and the risks involved and everything like that, it's just going to, I think, create more of a crisis, mental health crisis, coming from that standpoint. And just the fact that it is- we're doubling the fees, that exceptionalism of keeping it to this upper class that can afford it is just going to increasingly stigmatize in my mind the impacts of other substances on people's mental health and how they use that to cope. And to me, that's just not obviously what we all want.

And I'm very much against doubling the fees. The fees in general were too high to begin with. I understand that it is a fee-based program, but that is just a bit egregious in my opinion, especially with what's going to- what is- how it's going to ripple affect the people that need it most.

Speaker 1: Thanks, Jade.

And we want to be respectful of everyone's time.

So, Anne, we have just a couple minutes left. And as Jesse said, we can pick up back on this rules section tomorrow when we reconvene at 9:00.

So I'll hand it over to you, Anne, really quick, and then Jesse can close us out for the day.

Speaker 12: I'm happy to speak about my comments tomorrow, but thanks so much for everything today, guys. We appreciate it. I appreciate you guys and appreciate everything everybody's doing to try to make this work.

Speaker 2: So thank you.

Yeah, so I, I would just like to share some appreciation for everybody in this meeting showing up and discussing things that are frankly difficult and doing so in a very thoughtful and respectful way. We still have a number of rules to cover tomorrow. We are going to have a 3-hour meeting, and we've reserved 45 minutes for the statement of need and fiscal and racial equity impact statement.

So if during the meeting tomorrow, Emily and I are hustling the conversation along a little bit, You know, it's just in the interest of time and making sure that we cover all the sections.

We will have ample time to continue the discussion of the fees. And the draft impact statement was sent via email this morning. It was not ready when we sent everything on the 25th, and it is also included, I believe, in the meeting materials on the website.

Speaker 1: Yeah, I was just going to add that, that it has been added.

So if you go to our administrative rules and rulemaking process webpage, our meetings and all the meeting materials can be found there as well.

Speaker 7: Jesse and Emily, I've kind of skimmed that document, and I'm not seeing in here any kind of breakdown of the costs that you're a section is having, and I'm not talking deeply specific, but my understanding is the costs that you guys are getting hit up with are a lot of administrative costs that are outside of your control.

But also there are legal costs that your section is being charged for to defend against any kind of legal maneuvering against against this measure for any intent, good or bad. I think it might be interesting for us to understand the doubling of the fees if we had a concept of the percentages of your budget that are being put into these other sections other than just the servicing of the licenses and the facilitators and the rules.

You know, how much is there might also help us understand why that doubling of fees is necessary.

Speaker 2: So I've noted your comment, and I'm going to take it back to our section manager, Angie Albee.

You know, program staff is really unable to speak to budget particulars. That's squarely the responsibility of our section manager.

And when we get to the impact statement, we'll describe a little bit more because it is a very particular process. It is, it is a document that has a narrow purpose. I understand, but your comments have been received and I am going to take them back to Angie.

Speaker 7: I had the same conversation with Angie a couple weeks ago as well.

Speaker 2: Okay, thank you. And We will see you all tomorrow, and, and thank you again very much for your time.

Speaker 7: Thank you.

Speaker 1: Yeah, see you tomorrow at 9 o'clock in the morning.

Speaker 10: Bye, everyone.

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