

Good Afternoon. It has come to my attention that the Oregon Department of Consumer and Business Services' Division of Financial Regulation are accepting informal public comment to take into consideration as they work with the established Rules Advisory Committee to implement HB2002 gender affirming treatment guidelines. I have seen a draft of the proposed rules and would like to share my concerns as a licensed behavioral health professional practicing in the state.

I have 11 years of experience conducting psychotherapy, with enough of that practice focusing on individuals experiencing distress related to concerns around sexual orientation and gender identity that I have witnessed first hand how psychologically vulnerable consumers of medical and mental health services can be irrevocably harmed by medical interventions aimed at reducing or alleviating their psycho-emotional distress. This is one of the reasons I have deep concerns around the blanket acceptance of WPATH's Standards of Care Version 8 as the administrative rule guiding the approach to supporting individuals with gender related distress in Oregon. As the DCBS exists to ensure adequate protections are in place for both consumers and providers of these services, it follows that you should be aware of and factor in the various criticisms of this treatment model, the lack of strong scientific evidence supporting these treatment recommendations, and the move several nations and public health institutions have initiated to move away from WPATH SOC Version 8 in favor of more cautious and behavioral health focused interventions, especially in younger populations.

Having previously testified at the State Capital, I am also acutely aware of the concerns many therapists in particular have around being accused of and reported to their licensing boards on suspicion of conducting *conversion therapy* which can be interpreted as any effort on behalf of a mental health professional to challenge or question an individual's statements with regard to how they identify with respect to gender. It has also come to my attention that there is no small business representation on the Rules Advisory Committee, which if true is not only in violation of state law, but a significant failure to elicit feedback from thousands of individuals both providing and seeking care for gender related concerns who stand to be potentially adversely impacted by the adoption of WPATH SOC Version 8 in toto.

I am humbly requesting that these concerns be addressed as this process moves forward in the interest of ensuring optimal care for Oregon citizens as well as optimal protections for the licensed professionals who provide this care.

Respectfully Submitted,

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