



INTERNATIONAL ASSOCIATION
FOR HEALTH COACHES™

Oregon Senate Health Care Committee
900 Court St. NE
Salem Oregon 97301

Dear Chairwoman Monnes Anderson and Members of the Senate Health Care Committee:

On behalf of the International Association for Health Coaches representing over 850 Health and Wellness Coach members in Oregon, **we strongly oppose Senate Amendment 3 offered by Sen. Steiner Hayward to HB 2303.**

We vehemently disagree that the practitioners noted in Section 14 of the Amendment should be classified as “Alternative behavioral health practitioners” and therefore subject to new regulations, fees and possible fines by the Health Licensing Office for noncompliance. **We are not aware of any other state or nation which places these types of restrictions on such a diverse group of coach practitioners.**

We affirm the practitioners noted in Section 14 of the bill are not “alternative behavioral health practitioners”, but peer supporters who provide general wellness, life, parenting, sleep and nutrition, information, options, recommendations, guidance, motivation, and skill-building to establish healthier lifestyle routines that are client driven.

At a recent meeting of the Senate Committee on Health Care, supporters of Amendment 3 stated multiple times the amendment is just a simple “registration” bill. We strongly disagree. **Amendment 3 creates a new occupational regulation regime.** The text of the amendment grants new and significant authority to the *Oregon Health Licensing Office* to develop regulations that define qualifications to practice (page 2, line 27), practice standards (page 2, line 30), and associated “fines or other penalties” for violations of those practice and registration standards (page 2, line 20).

Currently, Oregon’s occupational licensing and restrictions rank the state 6th most burdensome in the country.¹ New poorly defined regulations that were hastily introduced to the public without stakeholder input will put additional state mandated burdens on coach practitioners, discourage innovation and may cause many to leave the state entirely.

Additionally, the regulation of speech about diet, lifestyle, sleep, parenting and wellness raise profound First Amendment concerns regarding the rights of individuals. **Enacting provisions that limit speech found in Amendment 3 invite First Amendment lawsuits.**²

¹ States Ranked by Average Burden of Licensing Requirements, Institute for Justice.
<http://ij.org/report/license-to-work/tables/table-7-states-ranked-by-average-burden-of-licensing-requirements/>

² Oregon Man Claims State Muzzles Red Light Camera Critique, NBC News.
<http://www.nbcnews.com/news/us-news/oregon-man-claims-state-muzzles-red-light-camera-critique-n751371>

Significant consumer protections currently exist to protect against any unscrupulous actors in Oregon. Coach practitioners are prohibited by their training and by state law from engaging in the practice of a licensed healthcare field such as medicine or psychology. Oregon consumers may also report any business or practitioner to the Consumer Protection division of the Department of Justice.

Classifying privately certified coach practitioners as “alternative behavioral health practitioners” would contradict the definition of coaching and be detrimental to coaches, their clients, and the state.

Sincerely,

A handwritten signature in cursive script that reads "Darrell Rogers".

Darrell Rogers
Director, International Association for Health Coaches