



February 9th 2023

Senate Human Services Committee
900 Court St. NE
Salem Oregon 97301

Re: SB1521

Dear Chair Gelser Blouin and Members of the Committee,

We appreciate the opportunity to provide testimony related to this legislation. New Avenues for Youth is a nonprofit founded in 1997 that is dedicated to the prevention and intervention of youth homelessness. To that end, New Avenues contracts and works very closely with ODHS, currently operating two Child Caring Agency licensed programs and implementing several foster care-focused community-based services contracts. Given our mission and commitment to serve youth impacted by the child welfare system, New Avenues shares ongoing concerns for the care of youth in Temporary Lodging and is very supportive of the need for responsible regulation and oversight.

Hence, in reviewing the initial bill, we support the idea of utilizing an acuity-based staffing tool, and in particular working to enhance the quality of care provided in spaces like Temporary Lodging. **We do however have serious concerns and questions about Amendment 6, which we feel strongly should be addressed prior to the legislation moving forward.** The impact of this legislation as written is very broad, because the definitions of “placement safety, stability or crisis services” include all those providing daily supervision and support for children and youth in the custody of ODHS on-site and in the community (whether that’s in Temporary Lodging, at a Resource Home, or at a family home), as well as those providing weekly hours of skill-building services in those settings to try to reduce time spent in Temporary Lodging, avoid Temporary Lodging altogether, or return youth to families.

While we wholeheartedly agree that service providers for high-acuity youth should have specific and advanced qualifications, training, and oversight, we believe the Child Caring Agency designation for all service providers is too overreaching and will likely have unintended consequences. Not all services require the same level of oversight, and attaching over-regulation to services that do not will deter providers and impact youth by limiting service capacity and access. Further, this legislation focuses only on providers contracted by ODHS, while very similar services can be provided through OHA, OYA and non-state funded service delivery.

At minimum, we believe it is important that the state take the time to further examine the possible impact of these changes. Importantly, due to the short session, we do not believe there is adequate time to answer questions, review information, speak to the concerns of those impacted, and potentially further amend the legislation if necessary.



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FOR YOUTH

For these reasons we ask that you consider postponing work on this bill until it can be fully examined and modified to meet its true intent.

Sincerely,

Sean Suib
Executive Director