



March 14, 2025

House Committee on Labor and Workplace Standards  
Oregon State Legislature  
900 Court St. NE  
Salem, OR 97301

RE: Opposition to HB 3838 – HCBS Workforce Standards Board Concept

Dear Members of the Committee,

I am writing to express my strong opposition to HB 3838, the proposal to establish a Home and Community-Based Services (HCBS) Workforce Standards Board. While I recognize the importance of supporting and strengthening the direct care workforce, I have serious concerns about the potential unintended consequences of this legislation.

First and foremost, the creation of an HCBS Workforce Standards Board introduces an additional layer of bureaucracy that could slow down decision-making processes and create unnecessary administrative burdens. Oregon already has existing mechanisms to address workforce issues, including provider associations, state agencies and a state mandated staffing tool. Adding another board risks duplicating efforts and diverting resources away from frontline services.

Moreover, imposing uniform workforce standards may not account for the diverse and individualized nature of HCBS services. Flexibility is key in ensuring that individuals receiving care can tailor services to their specific needs, rather than being constrained by rigid statewide mandates. This legislation risks limiting the ability of HCBS providers to adapt to real-world challenges and client preferences.

Another major concern is the potential financial strain on small providers. Many community-based organizations operate on tight budgets, and additional regulations or requirements could lead to increased operational costs. If these costs are passed down to consumers or result in service reductions, it could negatively impact on the very individuals this bill seeks to support.

My company manages Sisters Senior Living, located in Sisters, OR. On February 24th, we had to give notice to the residents and their families that we were surrendering the assisted living license because it was no longer financially sustainable to continue to provide assisted living services.

As a result, at least 15 residents who receive State Medicaid assistance and other residents who require assisted living services are forced to relocate to other communities by April 24th in Bend and Redmond, which is at least 25 miles away.



The wages in this rural community are very high because Sisters is a destination community and most of our staff live and commute from Bend and Redmond. Because of this, we were not able to pass on the necessary costs to the residents, and we are unable to cover our expenses, thus withdrawing our license.

Should HB 3838 pass as written, it will cause unnecessary additional expenses that will create the same issues that we have experienced in Sisters.

Lastly, HB 3838 does not adequately address the root causes of workforce shortages, such as low wages and high turnover. A more effective approach would be direct investment in wage increases, training programs, and retention incentives rather than the establishment of an additional regulatory board.

For these reasons, I respectfully urge the Committee to reject HB 3838. Instead, I encourage the Legislature to explore alternative solutions that directly support HCBS workers and providers without adding unnecessary bureaucracy.

Thank you for your time and consideration. I appreciate the opportunity to share my perspective on this important issue.

Sincerely,

A handwritten signature in blue ink, which appears to read 'Warren E. Page'. The signature is fluid and cursive.

Warren E. Page, CEO