



March 17th, 2025

The Honorable Representative Dacia Grayber, Chair Oregon House Committee on Labor and Workplace Standards

Subject: Opposition to Oregon House Bill 3838 – Creation of a Home and Community-Based Services Workforce Standards Board

Dear Chair Grayber,

My name is Adriana Gavozdea, and I am a dedicated Realtor specializing in the sale of care homes. With over 14 years of experience as a caregiver and care home manager, I have the privilege of running a care home alongside my mother, who has been in the industry since 2002. Our family is deeply committed to providing hands-on care to seniors, understanding their unique needs and challenges.

In my role as a specialized Realtor, I help individuals navigate the complexities of entering and exiting the care home business. I see firsthand the burdens and obstacles my clients encounter, particularly in relation to transitioning policies and the lack of support from licensors. I also witness the excitement of new providers as they open their care homes, only to face disappointment when they realize the disparity in Medicaid rates compared to those received by larger facilities for the same services.

I firmly believe that adding another layer of bureaucracy will only increase the challenges for everyone in this industry. My goal is to advocate for solutions that prioritize care quality and provide robust support for both providers and residents alike.

1. ****Exceptional Individualized Care****

Adult care homes boast an impressive staff-to-resident ratio, typically around 1:5 or even 1:2. This allows for close attention, companionship, and timely assistance. Caregivers form strong bonds with residents, enhancing their overall well-being and health outcomes. Conversely, larger facilities may have ratios as high as 1:10 or 1:15, making it challenging to provide the same level of individualized care. Treating adult care homes like larger institutions overlooks their distinct benefits for residents who flourish in a more personalized setting.



March 17th, 2025

2. ****Regulatory Pressures Leading to Closures****

Implementing uniform regulations on adult care homes, without consideration for their size and unique care model, is likely to result in many providers shutting down. Many of these homes are operated by small business owners or family caregivers who lack the administrative resources to meet excessive bureaucratic demands. With an existing shortage of long-term care providers in Oregon, forcing these homes to close would limit options for seniors and those with disabilities, pushing more individuals into institutional settings that do not offer the same comfort and individualized care.

3. ****Unfair Financial Burdens****

Adult care homes do not receive the same level of financial support as larger facilities. Imposing identical workforce standards without adjusting reimbursement rates creates an unsustainable financial strain. If the state wishes to enforce additional regulations, it must first provide sufficient funding to enable adult care homes to meet these requirements, or risk driving them out of the system, further limiting care access.

4. ****Ignoring the Foundation of Adult Care Homes****

Adult care homes were established as alternatives to institutional care, not to be treated like larger nursing homes or assisted living facilities. The legislature must recognize that what works for a 100-bed facility does not apply to a home with five residents. Instead of imposing blanket regulations, collaboration with adult care home providers to craft tailored solutions that maintain care quality is essential.

5. ****Potential Negative Outcomes****

HB 3838 may lead not only to the closure of care homes but could also strain the workforce. Caregivers already stretched thin would face additional regulatory demands, reducing the time available for resident care.

6. ****Conflicts with Existing Regulations (Section 11)****

Section 11 claims to uphold collective bargaining rights, yet the board's authority to impose statewide standards undermines local agreements and limits provider flexibility. This bill imposes extra financial burdens on adult care home providers and the state under laws already addressing pay and working conditions.



March 17th, 2025

7. ****Privacy Concerns (Section 4(2)(g))****

The bill requires adult care home providers to disclose their business information and personal details of workers (e.g., home addresses, emails) to the board and third-party entities. This invasion of privacy heightens risks of harassment and identity theft for both caregivers and businesses.

If the goal is to enhance the workforce, policies should focus on:

- Supporting adult care home providers rather than overwhelming them with mandates.
- Offering financial resources and training, not punitive regulations.
- Encouraging recruitment and retention rather than creating conditions that drive providers and workers away.

****Recommendations:****

Instead of advancing HB 3838 in its current form, I urge the legislature to pursue more practical solutions that protect residents and providers alike:

1. ****Financial Support for Compliance**** – If new workforce standards are necessary, adult care homes should receive equitable funding to meet these requirements.
2. ****Stakeholder Involvement in Policy Creation**** – Collaborate with actual adult care home providers to develop effective regulations that enhance care without harming the industry.
3. ****Prioritization of Workforce Support**** – Focus on policies that support and retain caregivers rather than adding bureaucratic burdens.

****Conclusion:****

House Bill 3838, as currently drafted, overlooks the unique strengths of adult care homes and imposes unnecessary burdens on providers delivering exceptional, personalized care. Treating these intimate settings as if they were large institutions could diminish care quality, limit access to services, and exacerbate Oregon's long-term care crisis.

I strongly encourage you to oppose this bill or significantly amend it to ensure that adult care homes can continue to thrive and provide the high-quality, individualized care that so many Oregonians depend on. Thank you for your attention and consideration.

Sincerely,

Adriana Gavozdea,

OR&WA Principal Broker, Caregiver and Board Member for Oregon Care Home Council