



March 17, 2025

Chair Grayber, Vice Chairs Elmer and Munoz, and members of the House Committee on Labor and Workplace Standards,

My name is Anna Keenan-Mudrick, I am a parent, sister and auntie of an amazing handful of Oregonians who experience Autism, and the best friend of a childhood-to-young-adulthood friend who had a rare developmental disability which took her life at age 31. I came to this field, 32 years ago, with both personal and social-work-college-graduate passion for the work, starting as a Direct Support Professional, and incrementally working my way up the career ladder to Executive Director. I am a fervent, experience informed, animated advocate for those we serve, and for our phenomenal workforce!

**I am here today representing Community Providers Association of Oregon (CPAO), and the 33+ year old nonprofit I am honored to be a part of, Community Access Services (CAS), to explain our absolutely dire concerns about, and strong opposition to, House Bill 3838**

**This bill assumes we do not hear, support, respect or adore our workforce, and this is simply not true.**

Much like the vast majority of my Executive Director peers, I started in this field as a Direct Support Professional, have family connection to the work, and have tremendous passion for and dedication to the mission of our nonprofit, AND to our vital workforce. We fight tirelessly and creatively for them, both internally and externally, to get them the resources they need and deserve in pay, healthcare, retirement, short and long term disability, FSA, HRA, and through our Employee Assistance Program. Our Human Resources staff support our employees to understand and navigate their CAS benefits, and their OFLA/FMLA/Paid-Leave-Oregon protected leave options.

At CAS, for example, we offer a wide range of DSP position and schedule options across the agency. When there are needed changes due to the employee's need, or that of our nonprofit, in response to change in the needs of those we serve, we talk through these thoughtfully, flex where we can, and offer other program options that might better match their needs.

My Executive and Director teams and I have an Open Door policy to our employees and to those we serve, who thankfully use it frequently. And what they share with us has absolutely

influenced our actions. Their insights are invaluable and speak to what is occurring at the ground level on a day-to-day basis.

We adore and hold in high esteem our incredible workforce, which is why we are so obsessed with fighting for them, year after year!

### **HB 3838 proposes a Dangerous Homogenization of Pay, Positions, and Training Requirements**

HB 3838 homogenizes Direct Support Professional pay structures, positions and training requirements; an approach that does not recognize the tremendous individuality in support needs and desires of those we serve, nor does it support customized DSP position specialization within agencies that provide opportunity, variety and numerous upward promotional opportunities from within.

This agency uniqueness is vital to our longtime Oregon-homegrown, grassroots, organic approach to building services that recognize and respond to the individuality of the people we serve, while also providing a range of opportunities and experiences within and across agencies, for our incredible, much loved Direct Support Professional workforce. And with leaders with a plethora of direct experience in the field, professional expertise in what we do, combined with our contract assessment and training relationships with OT/PTs/Behavior Specialists, medical specialists and Language Pathologists, it is imperative that we drive our workforce training, based on our unique needs. For the health and safety of those we serve and our employees.

### **HB 3838 Creates Regulation and Oversight that Is Redundant to Existing Laws and Regulatory Bodies**

Our next huge concern is that this bill seeks to provide regulation and oversight that would be absolutely redundant to, and potentially in conflict with, existing laws, regulations and oversight bodies that help keep Oregonians in the workforce generally, and those with Developmental Disability specifically, to ensure health safety and justice for those we serve, and for those in our employ. Many of the current regulations and overseeing bodies already in place include:

BOLI, OSHA, Oregon Developmental Disability Services' Licensing Unit, Oregon State Board of Nursing licensing, Community Developmental Disability (CDDP) Program Protective Services, Office of Developmental Disabilities' Office of Training, Investigations and Safety, CDDP & Support Service Brokerage case manager authorization and monitoring of services, Residential Facilities Ombudsman and Disability Rights Oregon, Oregon DOJ's Medicaid Fraud Protection Unit, HUD, Oregon Building Code Division

I want to be clear that we also recognize that the Department of Human Services and the Office of Developmental Disability Services need the tools and the leverage to more effectively and efficiently move providers along who are not operating their businesses as they should, and am aware there are a couple of bills in play this session that may help them gain these.

**HB 3838 would force years of thoughtful, responsive, person-driven organizational design into a cookie-cutter workforce restructure that would risk provider stability and viability**

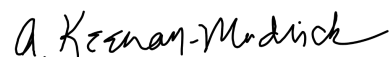
The changes suggested in HB 3838 would force organizations who have been doing this mission-driven work in a very responsive, customized way to completely, homogenously restructure – in a way that I frankly see as dangerous to those we now serve whose diagnoses, support needs and wishes vary tremendously. And it would hurt our workforce, as the variation in DSP and in paths and positions in leadership we currently have, would be completely reworked, flattened, decreasing opportunity. This homogenization would not only risk the person and employee centered cultures we have created within our agencies, but would also put many providers at risk from a fiscal viability standpoint – a complete disruption/upset of our DSP structures and pay systems, and for most of this, this is already a rather delicate financial balance. We could lose many critically needed provider agencies in the wake of this, creating more crisis for those served and for our workforce.

I'll add that the Bill's requirement to provide employee information to the Board, violates their privacy rights, and providing access to this level of detail publicly also contributes further to the risk of destabilization of our agencies. In an already highly competitive market, it makes it even easier to directly, aggressively, en masse recruit from one agency to another.

**What our Workforce Truly Needs – Directly Invest in DSP Wages by funding New Rate Model**

We ask that you reference the work of ODDS in the Rate Model you directed them to complete, and invest in this as a means to truly support and embrace our workforce with us! We have a vehicle before us to fully support our committed, versatile, diverse, creative, response Direct Support Professionals!

In Gratitude,



Anna Keenan-Mudrick, MSW  
Executive Director, Community Access Services  
CPAO Legislative Chair