

Submitter: Erica Andrews  
On Behalf Of:  
Committee: House Committee On Labor and Workplace Standards  
Measure, Appointment or Topic: HB3838

I think the idea of having a board to suggest wages and standards is a good one. However, this proposal doesn't take into account how different and diverse home and community-based services are. These services are provided in all sorts of settings, by different kinds of providers and different funding sources depending on who we're serving and what their needs are. It's also worth pointing out that while the proposal talks about improving services for people with disabilities, the main focus seems to be on the workers, not the people receiving care.

The wage board might promise to get more money to DSPs, but the legislature controls the funding. Providers can't just go along with a wage board's recommendations if the funding isn't there to back it up. Also, stakeholders are already involved in the rulemaking process, and ODDS has stronger safeguards to make sure there's broad input. This bill creates another group that could change those rules with less input from people who are directly impacted, limiting the voices of those who should be heard.

If this proposal moves forward as is, it could put providers in a tricky position. There are already rules for staff, training, and how services are provided through Medicaid and social security. We've got OSHA and BOLI oversight, too. If this wage board sets its own standards that clash with existing rules, it could cause confusion and even lawsuits. Plus, we already have a rate model that shows services are underfunded, but the same folks pushing for a wage board have been against increasing funding to meet that model.

If the goal is to improve services and raise wages and benefits for direct care staff, there has to be ways to do that without creating a whole new government agency that just adds more layers and requires extra funding. With funding already uncertain for IDD services, that money would probably be better spent on services themselves. Especially when the future for IDD services looks like it's going to be leaner, the priority should be on keeping services accessible and getting funding to raise wages.

Thank you for your time and consideration.