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| Submitter:                     | Janelle LeFore                                   |
| On Behalf Of:                  | AFH Providers                                    |
| Committee:                     | House Committee On Labor and Workplace Standards |
| Measure, Appointment or Topic: | HB3838                                           |

I am writing to express my strong opposition to HB3838. As a provider who has owned and operated 4-5 Adult Foster Homes (AFHs) for the past 17 years, I have always prioritized fair wages, reasonable work schedules, and the well-being of my caregivers. This bill, however, threatens the sustainability of small providers like myself and could have serious unintended consequences for both workers and consumers.

#### Concerns with HB3838:

**Increased Bureaucracy and Regulatory Burdens**The establishment of a new Workforce Standards Board will add layers of government bureaucracy, which could delay critical decision-making processes and impose unnecessary regulatory burdens on service providers. Many existing regulations already provide oversight for worker conditions, making this additional board redundant.

**Financial Strain on Providers and Consumers**I have always paid fair wages to my employees while ensuring their well-being. However, if HB3838 mandates even higher wages and additional benefits without proper financial support, the cost will ultimately be passed on to the consumer. This could make essential home and community-based services unaffordable for many families. If these increased costs cannot be absorbed or offset, many providers may have no choice but to leave the industry, reducing care options for those in need.

**Impact on Small and Independent Service Providers**Small and independent HCBS providers may struggle to comply with new minimum standards, particularly if they impose costly operational changes. These increased costs could lead to reduced service availability, exacerbating existing shortages in HCBS workers and limiting access to care for vulnerable populations.

**Unintended Consequences on Workforce Supply**While the intent of the board may be to improve worker conditions, excessive regulations could discourage individuals from entering or remaining in the HCBS workforce. This could lead to a further shortage of qualified care providers, negatively impacting the individuals who rely on these services.

**Lack of Clarity on Training and Certification Processes**The bill permits the board to

establish training standards and certify worker organizations to provide such training. However, it does not specify how these organizations will be selected, what qualifications they must meet, or whether such requirements will create barriers for existing workers. Transparency and stakeholder input are critical in these decisions.

## Conclusion

While I support efforts to improve working conditions for HCBS workers, I strongly believe that HB3838, in its current form, introduces excessive regulations, increases costs, and risks unintended consequences that could harm both workers and care recipients. I urge the Legislative Assembly to reconsider this proposal, seek input from industry stakeholders, and explore alternative solutions that balance worker protections with practical, cost-effective implementation.

Thank you for your time and consideration. I welcome any opportunity to discuss these concerns further.

Sincerely,  
Janelle LeFore