

Catholic Community Services Foundation

Letter of Opposition HB 3838

House Committee on Labor and Workplace Standards

Dear Committee on Labor and Workplace Standards,

As a representative of Catholic Community Services (CCS) I am writing to express my strong opposition of HB 3838.

CCS has provided care for Individuals with Intellectual and Developmental Disabilities (IDD) since 1996.

We currently provide care for 44 individuals in 14 homes in Salem and surrounding areas. We pride ourselves on creating a homelike atmosphere for those we serve with caring, well-trained staff to provide that care. Many of our individuals are medically fragile, whose care requires additional training and requirements for our staff.

Contract rates for 24/7 residential care programs have not been adjusted for several years. This failure to appropriately and adequately fund critical services to vulnerable individuals has resulted in organizations, such as ours, taking on large amounts of debt to continue to provide excellent services. Currently, our costs far exceed what we are receiving from the state, putting a strain on our budget and the ability to provide the level of care and support that we believe our individuals and staff deserve.

The regulations in HB 3838 will further exacerbate the issue, taking time and resources to implement in an environment where we are already struggling to cover costs. The additional requirements will bring us to the breaking point. While the proposed amendments seek to ensure that new regulations that cost the state money must be funded first, these amendments have not been written and do not cover all of the costly actions by the agency.

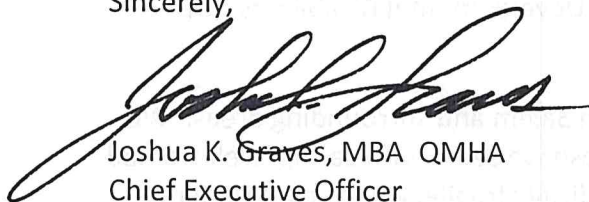
Additionally, the requirements to report our employees' personal information to the Home and Community-Based Services Workforce Standards Board and that the employee's personal information would then be made available to certain worker organizations without the employee's consent, is very concerning to us. This feels like an unnecessary intrusion into an employee's privacy and a move to unionize our industry.

We do not support the private right of action against employers in conjunction with the new requirements of this board. There are already policies in place that protect employees' rights and this could lead to lengthy, unnecessary legal battles that would further strain our already struggling budget.

Overall, while the bill aims to improve workforce standards, it could impose significant financial and operational burdens on service providers, especially non-profits. If implemented, this bill will affect the quality and accessibility of care for individuals in 24/7 residential care in Oregon.

The better solution is to fully fund IDD rates today, enabling organizations such as CCS, to provide increased training opportunities, competitive wages to attract and retain quality staff, and increase the sustainability of the provider system. Ensuring that rates appropriately and adequately fund services will enable long standing service providers to continue to provide the type of care the IDD community deserves and one that we can sustain for years to come.

Sincerely,



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