

## Written Testimony in Opposition to HB3838

Submitted by: Carrie Brickey

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Committee: House Committee on Labor and Workplace Standards

Chair Grayber, Vice-Chair Elmer, Vice-Chair Munoz, Members of the Committee,

My name is Carrie Brickey, and I am the Executive Director of Alternative Services Oregon. I live in Tigard, and our organization operates across six counties in Oregon. Today, I am writing to express my opposition to House Bill 3838.

Alternative Services Oregon is a non-profit organization dedicated to supporting individuals with intellectual and developmental disabilities (I/DD) by offering a range of home and community-based services (HCBS). We take pride in delivering person-centered support and providing programs that help individuals feel safe, independent, included in their communities, and empowered to explore and achieve their personal goals. I have worked in the I/DD field for 25 years, and I am happy to write to you today advocating for both the individuals we serve and the dedicated employees who make it all possible.

I agree with the testimony that I've read that opposes House Bill 3838, and as I read through the bill, what stood out to me was the direct impact the creation of a new "Standards Board" would be. While the intent may be to standardize or regulate HCBS providers, what this bill actually proposes is the creation of a state bureaucracy that will impose a significant administrative burden on providers like us.

Contrary to what I've read from those that support House Bill 3838, for our organization, we strive to keep our administrative costs low so we can direct as much funding as possible to the Direct Support Professionals (DSPs) who do the crucial, front-line work. Our DSPs are the backbone of our services, and their work has the greatest and most direct impact on the lives of the individuals we support. Instead of creating additional levels of bureaucracy, we should focus on investing in this critical workforce.

House Bill 3838 essentially establishes a powerful regulatory body with sweeping authority. This body would function like a state agency but without the oversight necessary to ensure its accountability. This is not a minor change; it adds another costly layer of bureaucracy on top of an already heavily regulated system. Resources that should be going directly into support services will be diverted to administrative overhead. For organizations like ours, this is a step backward, not forward, and it undermines our longstanding goal of keeping administrative costs low to maximize the support we can provide to those in the I/DD community.

The testimony I've read that supports House Bill 3838 implies that the system is currently lacking oversight. This simply isn't true. Providers like myself navigate a maze of regulations from multiple agencies, including ODHS, OSHA, BOLI, OHA, CDDPs, Brokerages, and Ombudsmen. Instead of simplifying or streamlining the regulatory environment, House Bill 3838 would introduce overlapping regulations, and reduce the overall efficiency of services.

This bill fails to address the real challenge we face: increasing costs for Medicaid-funded providers without any guarantee of new funding to offset these costs. What we truly need is not another layer of regulation, but meaningful investments in the Direct Support Professional workforce. These are the people who provide hands-on care, helping individuals with disabilities live fuller, more independent lives. Yet, this workforce is historically underfunded, undervalued, and overburdened by low wages and high turnover rates. House Bill 3838 diverts resources away from Direct Supports with no guarantee funding for new standards. A real investment in DSPs would go a much longer way in improving the quality of care we provide than adding more regulations to an already complex system.

I urge you vote no on House Bill 3838. Let's focus on making smart, meaningful investments in the DSP workforce and ensure that funding goes directly to the people who need it most — those we support and the dedicated professionals who care for them.

Thank you for your time.

Sincerely,  
Carrie Brickey  
Executive Director  
Alternative Services-OR, INC.