



Oregon's Voice for Long Term Care & Senior Housing

March 18, 2025

Senate Committee on Human Services
Oregon State Capitol
900 Court St. NE
Salem, OR 97302

Re: SB 811

Chair Gelser Blouin, Vice Linthicum, and Members of the Committee,

Oregon Health Care Association represents long term care providers across the continuum. We are neutral on SB 811 and appreciate the Oregon Department of Human Services' focus on early intervention and technical assistance for providers so as to ensure resident safety and compliance.

While neutral, we have three questions and concerns we would like to work with the ODHS on addressing if this bill moves forward.

First, it is not clear what ODHS intends by the requirement that every facility have a policy and procedure in place around "succession planning." Depending upon what this standard means, we could foresee it being quite challenging for a facility to meet. However, we happy to work with ODHS on alternative language once we have a better understanding of the goal.

Second, SB 811 requires that ODHS *only* issue an initial license to a residential care facility if it is in compliance with all statutes and rules and that ODHS has completed an inspection of the facility. For a brand new build, this requirement makes sense. However, the sequencing may be a backward in the case of an acquisition of an existing facility since the applicant would not have control over the operations of the facility at the time of its application. From our perspective, there may need to be an adjustment in the bill.

Third and finally, our most significant concern with SB 811 is that it calls for ODHS to establish minimum required qualifications for an administrator of a facility with a memory care endorsement. Not only are there already enhanced training requirements in place for all staff who work in a memory care setting, but licensing qualifications *are* already established in statute and the Oregon Health Authority's Health Licensing Office issues licenses to qualified applicants. There is also a Long Term Care Administrator's Board whose responsibility is to

oversee the practice of residential care facility administrators. We believe this board should be consulted and lead the work to establish new or different requirements for administrators, so we do not create undue barriers to employment or career pathways. To our knowledge that engagement has not occurred.

Thank you.

Sincerely,

Libby Batlan
Senior Vice President of Government Relations
Oregon Health Care Association