

**3/19/2025,**

Oregon State Capitol  
900 Court Street NE  
Salem, OR 97301

Dear Members of the Committee:

My name is Tamara Lischka and I am a resident of Portland as well as a parent advocating on behalf of my adult child who experiences developmental disabilities. I appreciate the intent behind **HB 3835**, which seeks to establish a Home and Community Based Services (HCBS) Workforce Standards Board. However, I write today to express my **opposition** to the bill in its current form. While the bill may be well-intentioned, it raises several critical issues that could negatively impact individuals with intellectual and developmental disabilities (IDD).

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### **1. Inadequate Representation of Self-Advocates**

- **Lack of Self-Advocate Voices:** Of the thirteen proposed Board members, only two are designated to “represent the interests” of those receiving services. Unfortunately, the bill does not define how “representing the interests” is determined, nor is there a requirement that either representative actually be a self-advocate or someone with direct lived experience in IDD services.
- **Importance of Lived Experience:** Individuals receiving HCBS, particularly those with IDD, should have a **direct voice** in setting and overseeing the standards that affect their daily lives. They are often best positioned to inform policymakers and stakeholders about the realities, challenges, and successes inherent in the system.

### **2. Lack of Distinction Between Varied Disability-Related Services**

- **One-Size-Fits-All Approach:** HB 3835 does not distinguish between the range of services needed for people with IDD and those for other types of disabilities. By treating all disability-related needs the same, the bill fails to account for the unique challenges, varied levels of support, and specialized care that individuals with IDD often require.
- **Potential Underrepresentation of IDD Needs:** Without explicit consideration of IDD-specific expertise, the Board’s decisions may overlook or dilute the unique needs of this community, ultimately resulting in policies that are less effective—or even detrimental—for individuals with developmental disabilities.

### **3. Duplication of Existing Regulatory Processes**

- **Overlapping Authority:** Oregon already has state agencies and advisory bodies—particularly within the IDD community—that consult on, enforce, and regulate care standards. Creating a new Board with broad authority risks duplicating existing efforts, leading to confusion among service providers and those who rely on these services.

- **Need for Clarity and Efficiency:** The proposed HCBS Workforce Standards Board could inadvertently add another layer of bureaucracy. Rather than improving and streamlining oversight, it may complicate the regulatory landscape and create competing or contradictory guidelines.
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## Recommendations

1. **Ensure Meaningful Self-Advocate Representation:** Amend HB 3835 to require that a minimum number of Board seats be reserved for individuals with direct lived experience, including those with IDD. This will help ensure the Board's decisions accurately reflect the needs of those who rely on these services.
  2. **Distinguish Among Different Disability Communities:** Clarify in the legislation that the Board must address and accommodate the diverse needs of disability populations, specifically including IDD. A one-size-fits-all approach overlooks critical nuances essential for effective care.
  3. **Avoid Redundant Bureaucracy:** Require the new Board to coordinate with existing advisory bodies and regulatory agencies to prevent duplication of efforts. Collaboration with existing IDD advisory committees would streamline processes and ensure a comprehensive, unified approach to workforce standards.
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## Conclusion

I recognize the Legislature's dedication to improving home and community-based services in Oregon. However, **HB 3835** as drafted raises serious concerns regarding representation, the distinct needs of individuals with IDD, and the potential creation of redundant regulatory structures. These issues must be addressed to truly improve the quality of care and protect the rights and interests of the IDD community.

I respectfully urge you to reconsider and amend HB 3835 to better represent and protect individuals with IDD and their families. Thank you for your time and consideration of my testimony.

Sincerely,

**Tamara Lischka**

Parent and Advocate for an Adult Child with IDD  
Portland, OR