



Oregon Alliance

3/26/2025

Dear Chair Gelser Blouin, Vice-Chair Linthicum, and Members of the Senate Committee on Human Services,

On behalf of the Oregon Alliance of Children's Programs, we want to express our appreciation for your commitment to improving the safety and well-being of children and youth across our state. We recognize the thoughtful efforts behind SB 1113 and appreciate the inclusion of certain provisions that clarify expectations for regulated entities and address concerns regarding training certification.

We especially value:

- The clarification "regulated entities" encompass various providers affected by these rules (pg. 17, line 36).
- The provision that ensures being out of date for training certification is not, in itself, grounds for substantiating abuse (pg. 36, lines 6-8).

We respectfully oppose the bill due to concerns regarding several aspects of SB 1113 that we believe could create unintended challenges for providers and caregivers. Our primary concerns include:

1. **Does Not Address a Reasonable Person's Response in Crisis:**

SB 1113, like previous regulations, does not adequately account for the reasonable actions of a caregiver or provider when responding to a crisis where imminent harm is possible. In high-stress moments, caregivers must be able to act swiftly in the interest of safety without undue concern that procedural ambiguity may later result in punitive measures.

2. **Restraint Language and Predictability:**

The requirement that an individual must be able to predict that "a less restrictive intervention would not be effective at preventing imminent serious bodily injury" is difficult to navigate in real-world crisis situations. If the bill defines restraint parameters, it should be based on a reasonable person's standard to ensure clarity and applicability.

3. **Encouraging Improvement Over Fear:**

SB 1113, as currently written, may foster a climate of fear rather than an opportunity for education, corrective action, and improved care. We encourage language that supports training, support, and guidance rather than a strictly punitive approach, which could discourage individuals from working in field.

Thank you for your time and consideration.

Sincerely,

Vera Stoullil
Interim CEO
Oregon Alliance of Children's Programs

Empowering Organizations,
Transforming Lives