

April 28, 2025

Dear Chair Bowman and Vice-Chairs Drazan and Pham,

Re: **Opposition to House Bill 3838** – Establishment of a Home and Community-Based Services Workforce Standards Board

I am writing to you as a nurse and an adult care home provider.

While I understand the intent behind this bill, I strongly oppose this bill and am deeply concerned that the legislature is creating yet another level of **unnecessary** bureaucracy that impacts on our ability to provide the best care to residents. I am greatly disturbed that this is even taking the time of our hard-working legislators when for many years, we have struggled with ineffective policies, government overreach, archaic payment systems and an already overburdened Medicaid workforce (specifically, Medicaid case managers for financial/service assessments) and overburdened DHS licensors. We should focus on reinforcing the Wage Survey to boost Medicaid reimbursement for our providers.

Key issues to address before creating this board:

1. Adult care homes with a Medicaid contract often experience delays or insufficient payments. Maintaining their Medicaid contract can be challenging for adult care homes due to ongoing issues with payment processes. The disparity between the larger facilities and the small adult care homes is disproportional and historically this has been an ongoing issue that provoked ACH providers to do away with their Medicaid contracts.
2. We are losing adult care home providers at an astronomical rate due to the poor Medicaid reimbursement, lack of qualified caregivers and overwhelming government bureaucracy. (\*A major issue is the lack of consistency between counties). Licensor attitudes towards the ACH providers create a poor working relationship and one that is adversarial as opposed to collaborative. I have escalated this concern to the DHS leadership and strongly believe that the licensors should have more training pertaining to trauma informed care, cultural sensitivity and microaggressions towards the ACH providers.
3. The State needs to recognize that we are small “mom and pop” businesses and cannot compete with the larger facilities. We already have specific training requirements in the Oregon Administrative Rules and have ongoing training. The necessity of establishing a Workforce Standards Board warrants discussion, as the mandatory training requirements are already well defined.
4. SEIU is far from effective to be a union for the adult care home providers. In the close to 14 years working in adult care homes, I have found that SEIU has never helped me or my colleagues with the specific issues and concerns we escalated to them. The last time I attempted to reach out for assistance was last year when I was asking for guidance on the specific needs for our home. I placed multiple phone calls, email requests, social media posts to find ANYONE at SEIU that could help me (except for one ACH provider that did try to get me in contact with someone via Facebook). Otherwise, there is no answer or outreach from the leadership that could answer my questions and address my concerns. I am highly suspicious that this Home and Community-Based Services Workforce Standards Board is a ploy for SEIU to grow and build their membership. Furthermore, I do not understand HOW this union can represent both the

workers(employees) and the owners/providers of the care homes. It does not make any sense to me.

I strongly recommend that the authors of HB 3838 visit our adult care homes and witness firsthand the type of care we provide for our residents. By creating yet another bureaucratic entity, the State is bypassing the key issues that hinder our ability to provide care to our most vulnerable seniors and adults with disabilities. We cannot continue to lose ACH providers because of poor Medicaid reimbursement, overwhelming and ineffective bureaucracy and disconnect between the licensors and the ACH providers. Oregon has a strong history of innovative and cost-effective long-term care options in the adult care home sector. Let us strive to protect this level of care and fix the issues that impact on our residents and our ability to run a small business.

I implore you with all respect to reconsider HB 3838. I urge the House Democrats to stand brave and do not allow SEIU to bully you into supporting this disastrous and deadly bill that would intentionally harm our frail and vulnerable Oregonians. Remember, the SEIU FAILED to consult their own Local 858 and single-handedly silenced the adult care home providers.

Thank you for your time and consideration.

Sincerely,

Maryanne Cassera, RN