

I understand that the House Committee on Rules Committee heard testimony today on this bill and I wish to add my strong recommendation you **not to advance HB 3838**. This bill represents a serious threat to community-based care providers such as the provider in which I live.

Serious Concerns Raised by HB 3838

Shifts Lawmaking Authority:

[HB 3838](#) proposes a significant shift in law-making authority away from the legislator to a small, Governor-appointed board that would be empowered to set workforce standards, including wages, benefits, and staffing schedules, for a broad range of providers and the diverse populations they serve, across multiple payer sources. **This is not the way policy should be determined and monitored. We elect a legislature to do that job.**

Destabilizes an Already Fragile Sector:

HB 3838 is bad policy that will destabilize an already fragile sector, taking away a community's ability to make employee-related decisions based on resident needs, workforce realities, and financial constraints. Instead of strengthening the workforce, this bill will worsen staffing challenges **by adding unnecessary bureaucracy, increasing costs**, and diverting focus away from providing care to vulnerable populations.

Key Concerns:

- **One-size-fits-all doesn't work.** Community-based care is an incredibly broad umbrella, covering services for older adults, people with intellectual and developmental disabilities, and even children. Services are provided in diverse settings, from rural in-home care to large urban campuses.
- **We support workers too.** As a resident of a CCRC, it is to our benefit offer competitive wages, benefits, career advancement opportunities, and safe working conditions **if for no other reason than to attract good staff members in this competitive environment.** Our CCRC already operates under heavy regulatory oversight, including complex, acuity-based staffing mandates passed by the Legislature in 2021. **HB 3838 would give a new board authority to dismantle systems that were just thoughtfully adopted.**
- **Consumer impact is ignored.** The bill requires the board to return to the Legislature only if its actions create a state budget impact, **but it ignores the financial burden placed on consumers and providers.**
- **Sweeping authority without representation.** HB 3838 gives expansive rulemaking power to a governor-appointed board. The electorate would have no say in who represents them.
- **Learning from Other States.** Bill proponents cite other states as examples, but most of those boards are *advisory only*—not regulatory.

HB 3838 undermines the stability and flexibility needed to deliver high-quality, community-based care. We respectfully urge you not to advance this bill.