

Greg Ewert
Alliance Services
901 Brutscher St, Ste 219
Newberg, OR 97123

April 29, 2025

Chair Bowman, Vice-Chairs Drazan & Pham
House Rules Committee
Oregon Legislature
900 Court St NE
Salem, OR 97301

Re: HB3838-HCBS Workforce Standards Board

Chair Bowman, Vice-Chairs Drazan & Pham & Members of the Committee,

My name is Greg Ewert, and I am the CEO of Alliance Services, based in Newberg, Oregon. Since 2015, we have employed Direct Support Professionals (DSPs) who serve individuals with Intellectual and Developmental Disabilities across eight counties. I am writing to strongly oppose HB 3838 and the -3 amendment, which creates a Home and Community-Based Services Workforce Standards Board. This bill threatens service providers, vulnerable Oregonians, and taxpayers by introducing unnecessary bureaucracy and increasing costs.

HB 3838 duplicates existing regulations by allowing the board to recommend service rates and wages, despite federal requirements under CMS' 2024 *Ensuring Access to Medicaid Services Rule*, which already mandates comprehensive rate reviews every five years, and other similar federal policies regarding waiver applications to CMS. A [recent actuarial review by Burnes & Associates](#) fulfilled this requirement. Creating another regulatory body wastes state resources and risks compliance with federal law.

The bill also grants excessive authority to the board to regulate scheduling, staffing levels, and labor conditions beyond existing state and federal protections. This undermines the autonomy of employers and creates rigid workforce policies that fail to account for the unique needs of individual providers and workers, and more importantly the individual needs of the vulnerable Oregonians we serve. Additionally, the mandate to disclose employee contact information to worker organizations raises serious privacy concerns, especially for employees who may be victims of domestic violence, stalking, or other traumas.

HB 3838's unfunded mandates will increase operational costs, reducing provider capacity and limiting access to critical services. Many DSPs already benefit from existing labor protections, and rather than diverting funds to a redundant board, we should focus on directly investing in the workforce.

We do not produce goods—we provide human services. The success of these services depends on a strong, supported workforce. We urge you to invest in DSPs directly rather than creating unnecessary oversight that diverts resources away from care. Please vote **NO** on HB 3838.

Sincerely,



Greg Ewert
CEO | Alliance Services
(971) 512-0853
greg@alliance-services.org