



February 5, 2026

To: Rep. Nosse, Chair, House Committee on Healthcare  
From: Katie Rose, Executive Director, Oregon Community Brokerages  
RE: HB 4040, section 14. allowing CEN providers to enroll as PSWs

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Oregon Community Brokerages is an association of the 14 Support Services Brokerages currently operating across the state of Oregon. We serve 7,700 adults with intellectual and developmental disabilities (IDD) living in their own or family homes, providing them with the case management and supports needed to connect them to community resources and direct service providers where they live. Support Service Brokerages have over 20 years of experience supporting adults with IDD to recruit, hire, and manage services from Personal Support Workers and Direct Support Professionals.

Brokerages have decades of experience supporting and assisting adults with IDD to navigate paid service relationships with their parents. Parents are sometimes the safest and best solution to a person's in-home care needs. We know that kids with IDD who need care and their families cannot always find it available from providers in their communities. We also know that there are potential risks to parents acting as paid providers to their children, including isolation and a loss of self-determination. With those risks and benefits in mind, we must oppose opening CEN providers to the option of becoming Personal Support Workers and recommend that we continue to allow them to provide services only as Direct Support Professionals (DSPs). DSPs are direct employees of licensed and credentialed IDD support service agencies. PSWs are direct employees of the person they are supporting, their legal guardian, or another representative.

SB 91 (2023) created the Children's Extraordinary Needs program in Oregon. Under this program, a select number of qualified children with very high medical or very

high behavioral needs have the option of paying their parents as Medicaid caregivers. Supporting positive outcomes for these children and families requires mindful safeguards to assure the child's wishes and interests. We testified on SB 91 about the important policy points that were outlined so thoughtfully therein.

Paying parents to care for their children changes the families who use this policy. We appreciate that SB 91 created structure and accountability measures to support positive outcomes. These measures included specifically disallowing CEN parents from serving as PSWs. SB 91 and the CEN program that it authorized require that a paid parent caregiver must be employed by a direct support agency rather than as a PSW. We believe this is important for a couple of reasons:

**It removes employer-employee relationships from immediate family members.**

These dynamics occur in adult services and are often deeply complex. Conflicts of interest are hard to avoid when spouses supervise one another. It seems imprudent to introduce such fraught dynamics during the intensity of childhood.

**It builds in a supervisory component from an established agency.** This creates a stronger layer of oversight of and support for the parent provider. This is intended to help a parent provider avoid missteps and navigate changes in support. We heard during the informational hearing that not every agency is fulfilling this duty. We respectfully suggest that compliance enforcement is the answer here, not a change in service structure.

Oregon Community Brokerages is grateful for the opportunity to submit these observations in consideration of HB 4040. We believe that the children and families participating in the CEN program are better served under the current structure and recommend against the changes proposed in section 14 of HB 4040.