

March 25, 2019

**Please vote NO on Senate Bill 669**

I am a Registered Nurse who has owned a highly respected Licensed In Home Care agency on the Oregon Coast for 16 years. I have been a strong advocate of state licensing since it began in 2003, but this bill creates unnecessary hardships on an already overregulated industry. Many of the recommendations in the bill duplicate protections already overseen by other governmental agencies, for example retaliation is already addressed by BOLI.

**Liquid Assets** - The requirement of having 2 months of liquid assets is not required of any other industry that I am aware of aside from financial institutions. This requirement is even more problematic when Medicaid and Veterans payments are sometimes months in arrears. Still our agency has never missed a payroll and governmental safeguards for this are also already in place. It would be sad to have one failed agency add this overwhelming burden to all agencies.

**Continuing Education** - My greatest concern is that this bill is being spearheaded by Client Employed Providers (CEP's) who now have NONE of the requirements in home care agencies already have in place, such as mandatory nursing supervision of all medications and six hours of mandatory education each year. I would applaud requiring nursing supervision and continuing education hours for state care providers and registry care providers which could be evaluated by the Home Care Commission. This would certainly raise their skill levels but the cost to the state budget would be very expensive.

Licensed in home care agencies already provide a higher standard of education which is customized to the individualized client needs. We train and test our care providers ourselves at our own cost. How would this proposed training by the Home Care Commission be provided and paid for? If the training is in Salem, rural agencies would suffer by having to pay transportation time and mileage costs in addition to a more generalized training, which would increase the costs to clients dramatically. Also there be a delay between the hiring date and the availability of the classes, making the client wait longer for caregiving services. This is simply not feasible for rural areas.

**Exemption from Labor Laws** - Why would having a Collective Bargaining Agreement exempt any industry from complying with Labor Laws? These labor laws have been enacted for the well-being of all employees. This legislation seems to discriminate against non-CBA agencies.

**Proprietary Documents** – What other industry is required to provide copies of private contracts and agreements publicly? This is protected proprietary information.

**Hospital Personal Care Services** – It baffles me that hospitals would be allowed to provide “personal care services” without having a license and that the state would create a new class of “private agency caregivers” who would also be exempted from agency rules and regulations. If the state had good reasons to create rules and regulations for agencies, why would we exempt others from the same standards?

By placing these onerous restrictions on top of our already large book of Oregon Administrative Rules Oregon agencies face the unintended consequences of making regulated licensed in home care so expensive that only the wealthiest of people could afford agency care, leaving other vulnerable elders with unregulated “personal care services,” “private agency services” and independent Client Employed Provider's with few if any oversight. Our elders will suffer terribly from this bill.

Thank you for your consideration,  
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