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To the committee members of the House Committee on Behavioral Health and Health Care,

I am writing in opposition to House Bill 2697 as it is currently written.

Morrow County Health District operates Pioneer Memorial Hospital, a Critical Access Hospital in Heppner, Oregon. Pioneer Memorial Hospital is the smallest hospital in the State of Oregon. For context, PMH had 1,131 emergency department encounters in 2022 and has an average inpatient census of less than one per day.

If HB 2697 is implemented as written, the most likely outcome will be a drastic reduction in hospital and home health services across the State of Oregon. Hospitals across the nation, including our local hospitals, have already reduced services because of an inability to staff beds. This is reflective of a nurse staffing shortage, not of an unwillingness on the part of hospitals to staff those beds and provide services.

It is well documented and well understood that there is a nursing shortage nationally and especially on the west coast. Mandating minimum staffing models when there are no nurses to be had will not create a safer healthcare environment, it will create a healthcare environment in which providers are incentivized to close services rather than risk excessively large fines for failure to comply. Small organizations do not stand a chance.

At Morrow County Health District, we have worked hard to develop staffing models for our hospital and home health programs to provide the best possible care, reduce staff burnout, and maintain financial viability. Despite our best intentions to bring on more nurses, we have had nurse positions sit open for over a year. We routinely compare our wages to the market, offer excellent benefits, contract with traveling staffing organizations, and yet... there are nearly always openings on our teams. This might sound dire, but for almost 30 years we have managed to provide high quality care for our community without regulations telling us exactly how to staff our services.

Our healthcare ecosystem has never been more vulnerable. Now is not the time to issue regulations that jeopardize our ability to provide services.

Sincerely,

Emily Roberts
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