



Oregon

Tina Kotek, Governor

Oregon Department of Human Services
500 Summer St NE
Salem, OR 97301



To: Chair Gelser Blouin, Vice-Chair Linthicum, and Members of the Senate Human Services Committee

From: Oregon Department of Human Services

Subject: Follow-up responses from November 17, 2025 hearing

Date: November 21, 2025

Dear Chair Gelser Blouin, Vice-Chair Linthicum, and Members of the Committee:

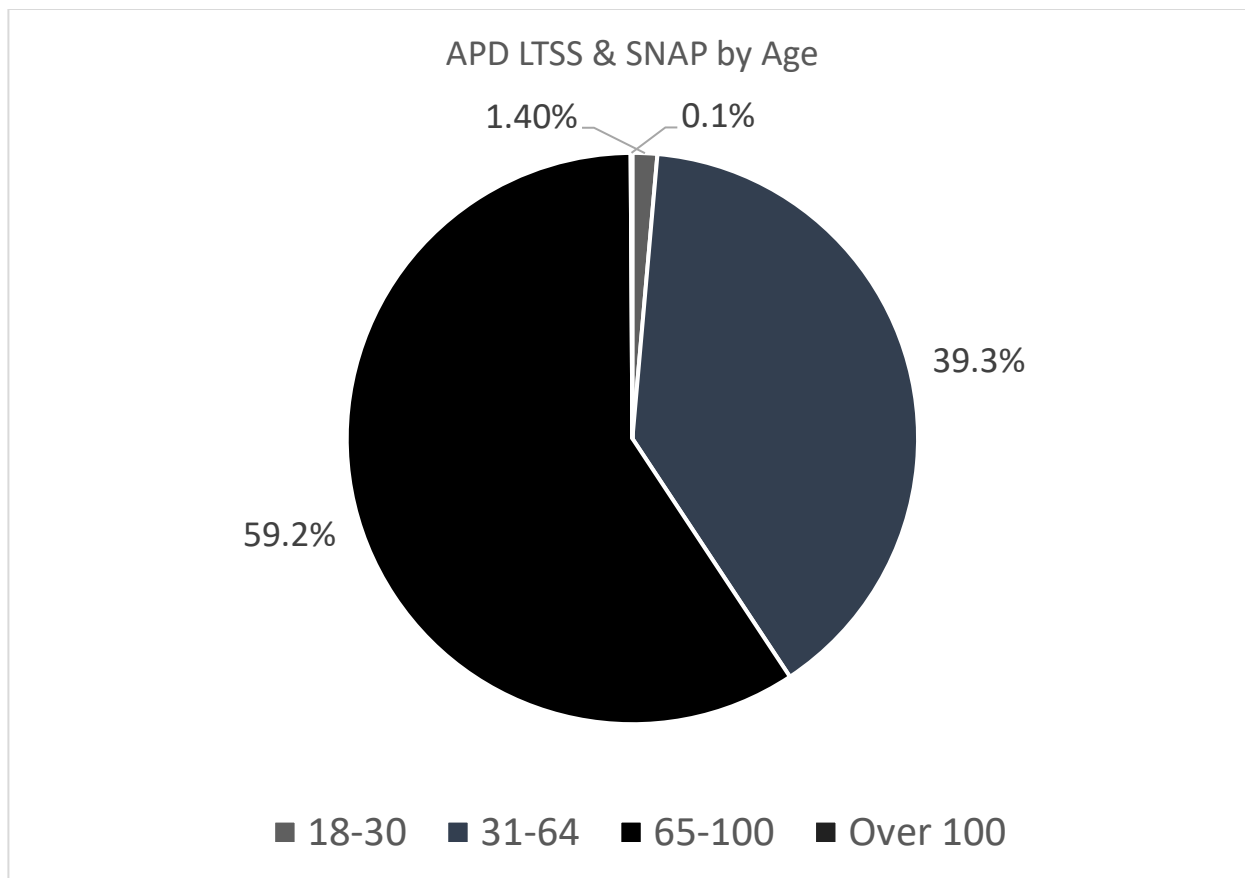
At your hearing on November 17, 2025, during Oregon Department of Human Services' presentations on Impact of Supplemental Nutrition Assistance Program (SNAP) Changes on Populations Served by Office of Aging and People with Disabilities (APD) and Office of Developmental Disabilities Services (ODDS), SB 739 Implementation updates, ODDS Director update, and Agency Updates on Temporary Lodging Initiatives, there were several questions that required follow up.

Please see the requested information below:

APD and SNAP

First, regarding APD long term services and supports (LTSS) recipients: APD serves a total of 43,111 individuals. Of those, 17,205 also receive SNAP benefits – constituting approximately 40% of APD recipients.

In looking at SNAP recipients by age, approximately 59.2% of them are between the ages of 65 and 100. There are also 23 Oregonians over the age of 100 who receive SNAP.

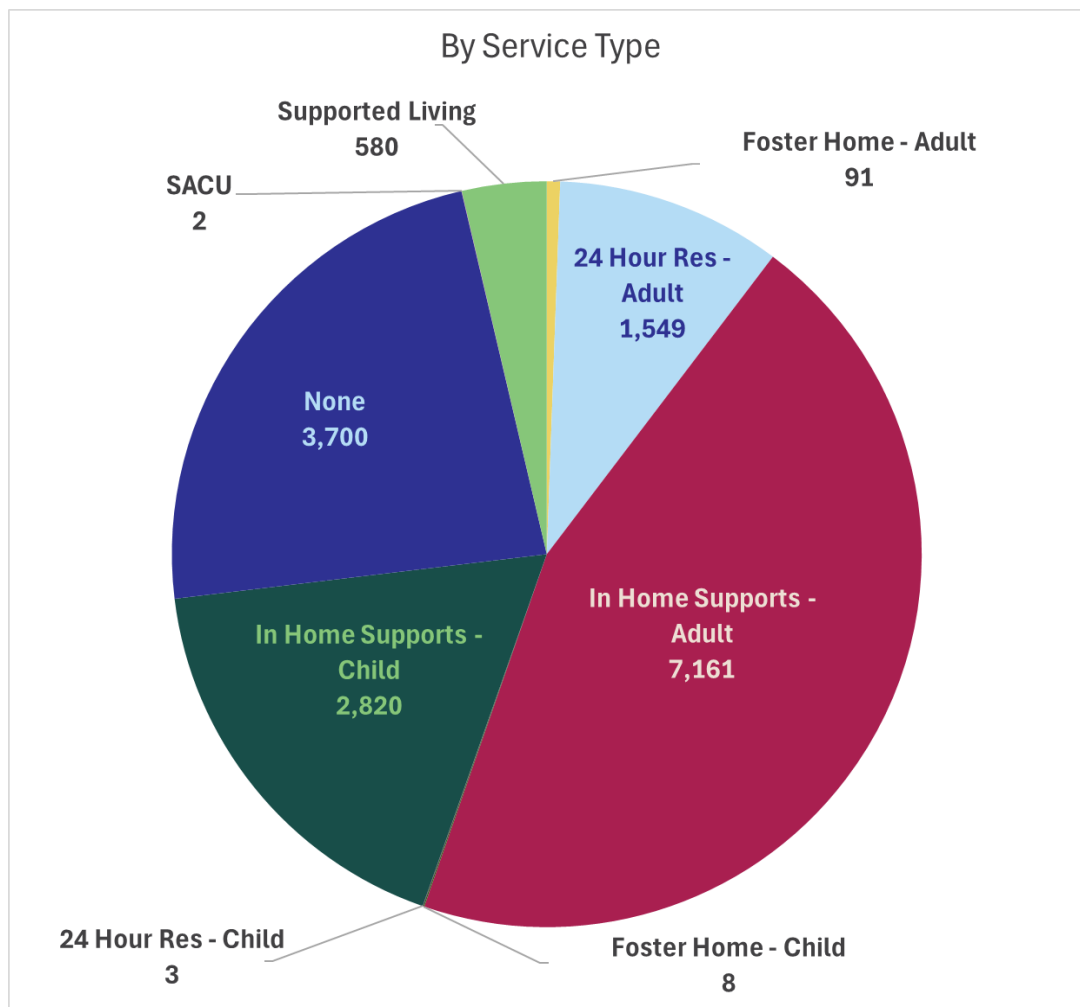


APD LTSS consumers who receive SNAP benefits primarily live in cities: 64.69% live in urban settings. The bulk of the remainder (31.91%) live in rural settings; 2.16% live in “low population” areas; and 1.24% have no address.

ODDS and SNAP

ODDS serves a total of 39,875 individuals: 26,364 adults and 13,511 children. Of those, 15,914 also receive SNAP benefits (as with APD, this is approximately 40%): 11,135 of these SNAP beneficiaries are adults and 4,779 are children.

Among ODDS SNAP recipients, looking at the population by service type (where “none” refers to individuals who are only receiving case management services) shows that individuals across all service types receive SNAP, though the majority receive in-home services.



Among ODDS SNAP recipients, 63% live in urban areas, 35% in rural areas, and 2% in remote/frontier areas.

SNAP Issuance Delays

Senator Prozanski posed a question about SNAP issuance, specifically asking how many people did not receive benefits when they were sent out in early November.

Oregon issued all SNAP benefits that could be validated on the night of reissuance, November 6th. A small number of cases – less than one percent, did not issue immediately due to several factors. Some households had recent changes in their head of household, or had individuals listed on multiple cases that required resolution before benefits could be reissued. Other cases were still in the process of being authorized at the time of the reissuance and were approved and issued later. Additional individuals may not have seen benefits arrive for other reasons, including garnishments (individuals with existing overpayment obligations may have seen reduced benefit amounts) and card security issues:

unfortunately, there continue to be instances of EBT card skimming, which are outside of the Department's control. Federal rules do not allow replacement of benefits lost to skimming. To help prevent future losses, ODHS sent reminders to clients to check their EBT balances before shopping and to use the EBT Edge mobile app to lock their card when not in use and unlock it only when making purchases. These are considered best practices for protecting benefits.

At this time, Oregon has resumed normal, real-time, and nightly SNAP authorizations and issuances.

SB 739: Timeline on Implementing New Licensing Requirements

Senator Gelser Blouin raised a question around why APD is implementing expanded relicensing cycles before requirements for additional written submissions for licensure and updated initial on-site inspections after initial licensure.

As the department sees it, these two provisions, though both related to the licensure of adult foster homes, are not directly related. The new requirements for written submissions by prospective providers before their initial licensure, as well as the requirement for an initial inspection no more than 120 days after initial licensure, both apply to new adult foster home providers who apply for a license after January 1, 2026.

The provision providing for a potentially longer cycle for adult foster home re-licensure applies only to established adult foster homes that have been operating in substantial compliance for three or more years. In other words, it is not a full shift to a two-year licensing cycle; just a shift to allowing certain adult foster homes to have a longer licensing cycle.

In both cases, a formal rulemaking process will be undertaken, each requiring several months due to statutorily required administrative processes. The rulemaking for different provisions of SB 739 is being grouped and phased due to the limited capacity of existing operations and policy analysts with rulemaking expertise. (The department continues to work toward recruitment of positions provided in SB 739, but those recruitments also require extensive administrative process before hiring. In the meantime, the department is shifting resources to this implementation work in order to attempt to finish it more quickly than the timeline presented, even though the goal remains 12 months as presented.)

The department remains open to feedback on the proposed timeline and any additional thoughts about the order of implementation.

SB 739: Implementation of Long Term Care Ombudsman Notifications

Senator Gelser Blouin also asked about why would it take so long for APD to implement the provision of SB 739 requiring the department to notify the Long Term Care Ombudsman of requests for exceptions to statutory licensing requirements other than those described in Section 3(1) of the bill.

Though this seems like a simple provision, implementing it requires rulemaking, workflow updates for staff, and training on the process for reporting such requests to the appropriate parties so that word can be passed along to the Long Term Care Ombudsman. The department is committed to notifying the Long Term Care Ombudsman of such requests to the best of its ability beginning January 1, 2026, but formalizing that commitment in rule and ensuring that all staff are reporting as required will take more time.

The department is not presently granting any requirements to statute, as prohibited by Section 3(1) of the bill.

SB 739: 90 day Implementation Timeline

Senator Gelser Blouin asked why the agency originally requested a 90-day implementation timeframe on SB 811 if those provisions, which eventually became part of SB 739, are now being extended out to 2026.

The Department erred in requesting a 90-day implementation for the provisions of SB 811. Those provisions require rulemaking, and timelines for rulemaking are far longer than 90 days. While ideally this would have been noticed and immediately communicated to the legislature, and an amendment to SB 811 requested, the matter eventually became moot because the provisions of SB 811 were amended into SB 739, which had an effective date of January 1, 2026, and SB 811 did not move forward.

As the sum total of implementation work deriving from SB 739 (including provisions requested as part of SB 811) became clear, implementation work was grouped according to a variety of factors including urgency, complexity, and resource availability. Some provisions come later in the proposed timeline due to a weighing of these factors, irrespective of whether they were part of the department-proposed provisions or the legislatively proposed parts of the bill.

The total of 39 positions funded for SB 739 (which included those funded in POP 101, originally tied to SB 811) are set for a phased funding release that started last month, with the final positions to be released in January 2027. The department has received approval

from the Department of Administrative Services to begin the recruitment process on those twelve positions already released in October and November.

The remainder of positions will be released as follows:

- 1 position to be hired no earlier than 12/1/25
- 7 positions to be hired no earlier than 1/1/26
- 16 positions to be hired no earlier than 7/1/26
- 3 positions to be hired no earlier than 1/1/27

This phased position release is aligned with the department's projected legislatively approved budget for the 2025-27 biennium.

ODDS Director Recruitment Follow-up

Thank you for giving the Department the opportunity to update the public on our recruitment efforts for a new Director of the Office of Developmental Disabilities Services. During that presentation, Senator Gelser Blouin asked how many applicants had applied before the extension of the application deadline. Prior to the extension that occurred in late August, 29 applications had been submitted.

Senator Gelser Blouin also asked if a similarly vigorous search had been conducted for the position of ODHS Director. Hiring for the ODHS Director and hiring for the ODDS Director are distinct as a matter of law and process. The director of the Department is appointed by the Governor, subject to confirmation by the Senate, pursuant to ORS 409.100. Our agency was not involved in this process and wouldn't be able to share information or comment on the search process for the ODHS Director. Administrative positions within the department such as division directors, however, are hired under the purview of the agency's director and are subject to the processes established by the agency.

For further information, please contact Roberto Gutierrez, ODHS Government Relations Manager, at Roberto.Gutierrez@odhs.oregon.gov.