

Submitter: Janet Combs  
On Behalf Of:  
Committee: House Committee On Labor and Workplace Standards  
Measure, Appointment or Topic: HB3838

I'm writing in opposition to this proposed bill, HB 3838. This is a bill that introduces additional, confusing bureaucracy to an already highly regulated environment. HB 3838 will lead to higher costs that are not supported by funding and that result in no discernible benefit to people with disabilities or the staff that support them.

Here are some of the concerns I have that are shared with the Intellectual and Developmental Disability (IDD) community:

- ? It fails to recognize the unique nature of ODDS services
- ? It creates a new state bureaucracy
- ? This would increase costs and reduces access to services
- ? It's redundant and overly complex
- ? It's a breach of employee confidentiality
- ? It's an unelected board with no checks and balances
- ? It circumvents the normal unionization process
- ? It diverts resources away from Direct Supports
- ? There's no guarantee funding for new standards
- ? These new standards can only increase and never be reduced
- ? There's a lack of representation from key stakeholders like providers, families and service recipients
- ? Curriculum and training standards should be set by experts

In conclusion, HB 3838 raises costs, reduces access to care, and adds unnecessary bureaucracy without improving wages for DSPs. Oregon should focus on direct workforce investments rather than creating a redundant regulatory body that will only complicate an already strained system.

The most effective way to support this workforce is to fund DSP wage increases directly, not to add another administrative hurdle that benefits interest groups rather than the people who rely on these essential services.

Please do not move this bill forward.

Thank you,

Janet Combs