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Dear Senate Committee on Rules,

My name is Carrie Howell, and I serve as the Executive Director of Chamberlin House Inc., a provider that supports adults who experience intellectual and developmental disabilities (IDD). I am writing in strong opposition to SB 1505.

The establishment of a workforce standards board threatens to complicate an already tenuous situation in the home and community-based services sector. With a legislative promise to increase funding rates in the second year of the biennium at stake, it is vital that efforts remain focused on securing this essential support rather than introducing new regulatory distractions. The existing challenges of unstable funding, coupled with the risk of diverting attention from critical funding priorities, necessitate a more streamlined approach. By focusing on strengthening current systems and ensuring adequate funding for DSPs, stakeholders can better support both the workforce and the individuals receiving services, leading to improved outcomes for everyone involved.

Establishing a workforce standards board entails high administrative costs that could divert funding away from Direct Support Professionals. Given the existing budget constraints, the funds allocated to this board could be used to directly increase DSPs' wages and benefits, which are crucial for maintaining a motivated workforce.

The latest Burns and Associates rate study indicates that the current funding model only meets 70% of the necessary costs. Instead of creating an additional oversight body, efforts should focus on increasing funding to meet the actual needs of the workforce and the individuals they serve.

The proposed board is expected to compile reports on wages and benefits; however, this function is already covered by the Burns and Associates

testimony rate study and the mandated National Core Indicators state workforce survey. These existing frameworks can be updated as costs change over time, eliminating the need for a new board to repeat these efforts.

The requirement to disclose worker names and city of residence raises significant privacy concerns. This practice could deter potential workers from entering the field, as they fear exposure or stigmatization. Additionally, implementing an opt-out process would require additional administrative efforts from service agencies, diverting resources from direct service provision.

Many providers have established positive work environments that foster a sense of belonging and respect among staff. The additional compliance requirements and administrative burdens imposed by the board could undermine these cultures, making it harder to attract and retain quality employees.

The Bureau of Labor and Industries already provides sufficient protections for worker rights, allowing employers to make necessary personnel decisions in a timely manner. The introduction of a new workforce standards board could create bureaucratic hurdles that delay these decisions. It is crucial to maintain a system that allows for flexibility and responsiveness to the needs of both workers and those they serve.

The Office of Developmental Disabilities Services already oversees licensed settings and services. Recent regulatory updates have strengthened accountability for service delivery. This approach encourages continuous improvement without overwhelming the system with redundant oversight bodies.

Conclusion

In summary, while the intention behind establishing the HCBS Workforce Standards Board may be to improve service quality and workers' conditions, the proposed board presents several challenges. From financial burdens and duplicative functions to privacy concerns and existing regulatory frameworks,

the potential negatives outweigh the benefits. Instead of creating new layers of oversight, stakeholders should focus on enhancing current systems, increasing funding for DSP wages and benefits, and allowing existing agencies like ODDS to carry out their responsibilities effectively.

Thank you for your time and consideration.

Sincerely,

Comi Howell



Executive Director

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