



February 4, 2026

To: Sen Jama, Chair, Senate Committee on Rules and Executive Appointments
From: Katie Rose, Executive Director, Oregon Community Brokerages
RE: SB 1505, establishing the Home and Community-Based Services Workforce Standards Board

Chair Jama, members of the Committee,

Oregon Community Brokerages is an association of the 14 Support Services Brokerages currently operating across the state of Oregon. We serve 7,700 adults with intellectual and developmental disabilities (IDD) living in their own or family homes, providing them with the case management and supports needed to connect them to community resources and direct service providers where they live. Support Service Brokerages have over 20 years of experience supporting adults with IDD to recruit, hire, and manage direct support workers. We also work with thousands of Personal Support Workers (PSWs) statewide to solve payment issues and get what they need to do their jobs.

Direct support workers are very important to the lives of people with IDD. OCB has a long history of supporting SEIU efforts to improve conditions and opportunities for PSWs. People with IDD benefit from a supported, resourced, and well-trained workforce. But considering reforms to the system to meet workers' needs must be done in balance with the rights and needs of the people served by the system. SB 1505 does not find balance but instead restructures the system away from public process and open discourse opportunities to a pressurized process contained within a member-limited decision-making body. The principles of self-determination direct us to develop processes wherein people with IDD directly inform every level of critical system decision-making, from design to implementation and confirmation. SB 1505 does not reflect those values. This board will also cost money to implement and will cost more once active as information requests and reports will require state worker time and resources. In a time of budget cuts and belt-tightening, we cannot afford this concept. For these reasons and more, Oregon Community Brokerages must oppose SB 1505.

The HCBS Board consolidates power away from the people for whom these services exist. The Board takes decisions that impact tens of thousands of Oregonians, currently accomplished through public processes, and consolidates them to a select few individuals. The Oregon system of HCBS services exists to support people with daily living support needs, including those with disabilities. The group of Oregonians served by the HCBS service system is very diverse, including sub-groups of children and adults with intellectual/developmental disabilities, mental and behavioral health diagnoses, and physical disabilities. The bill defines membership for this sweeping scope of work to be restricted to just 11 members:

- 3 representing the HCBS workforce or labor organizations (appointed by Governor)
- 3 representing employers of individuals in the HCBS workforce or employer organizations (appointed by Governor)
- 2 individuals who receive services provided by the HCBS workforce (appointed by Governor)
- 1 representing BOLI ((appointed by BOLI)
- 1 representing ODHS (appointed by Governor)
- 1 representing OHA (appointed by Governor)

It is not fair to balance membership of paid, organized representation entities like unions and trade organizations against the representation of individuals with the same broad categorical diagnosis of disability or age range. Asking any person with IDD to represent the needs and voices of all Oregonians with IDD is not reasonable. This sort of tokenism is no fair substitute for public engagement processes. *It does not benefit people served by this system to consolidate key workforce decision-making processes away from their ability to consider, provide input, and guide the development of these decisions.*

The HCBS Board excludes members of the IDD service system that have critical insights and contributions to make on rules, training standards, and workplace conditions.

Oregon Community Brokerages represents a segment of the contracted case management community for adults with IDD. Our case managers in Oregon are responsible for monitoring the services provided and ensuring that they follow the person's disability-related needs and comply with their preferences and federal CMS rules and regulations. As the monitoring body, our case management entities have a critical perspective on service provision that we provide routinely to every Rules Advisory Committee and public policy discourse. The entire IDD system will lose if we exclude case management contributions from this important work.

The HCBS Board described in SB 1505 is duplicative of existing structures.

SB 1505 establishes a Home and Community Based Services (HCBS) Workforce Standards board and defines its terms and membership. The core responsibilities of the board are detailed within the bill. They include:

- Adopting rules establishing minimum standards that are designed to ensure the health and welfare of workers. But such rules are already considered and adopted by applicable state agencies using due processes that include public opportunities for input. These opportunities come in a variety of forms, timelines, and structures. That kind of flexibility better matches the needs of people with IDD.
- Establishing curriculum for education and professional development opportunities for the HCBS workforce. This is already the purview of the Oregon Home Care Commission.

The HCBS Board laid out in SB 1505 is duplicative of other established, funded organizations and processes located around our current human services system. There may be benefits to a holistic look at this output as a whole, but there is no benefit to duplication.

Oregon Community Brokerages respectfully submits these comments in consideration of SB 1505 and urges you to vote no on this bill. Thank you for the opportunity to contribute to the discussion.