

Written Testimony in Opposition to SB 1505

Submitted to the Oregon Senate Committee on Rules Position: Oppose

Chair, Vice-Chair, and Members of the Committee:

My name is Blake Houser and I serve as a Quality Assurance and Intake Manager within Oregon's Home and Community-Based Services (HCBS) system. I am submitting this testimony to express strong opposition to SB 1505.

Oregon's direct support workforce deserves meaningful investment, but SB 1505 does not provide it. Instead, the bill introduces a new regulatory structure that duplicates existing oversight, imposes unfunded mandates, and risks destabilizing an already fragile provider network. The following concerns outline why this legislation should not advance.

1. SB 1505 Creates Redundant Oversight Without Improving Outcomes

Oregon's HCBS system is already governed by multiple regulatory bodies, including ODDS, BOLI, and OSHA. Each of these entities enforces standards related to training, safety, wages, and service delivery.

Establishing a Workforce Standards Board adds a fourth layer of regulation without addressing the underlying issues driving workforce shortages. Additional bureaucracy does not translate into improved care; it simply diverts time and resources away from direct support.

2. The Bill Allows Standards to Be Set Without Secured Funding

The most significant concern is that SB 1505 authorizes the Board to recommend wage and training standards without requiring the Legislature to fund them.

In a Medicaid-funded system, unfunded mandates have predictable consequences:

- Provider closures
- Reduced service capacity
- Longer waitlists
- Disruptions in care for people with disabilities

Oregon has repeatedly seen the impact of rate inadequacy. SB 1505 risks compounding that problem by creating obligations that providers cannot meet without corresponding reimbursement.

3. The Bill Requires Employers to Disclose Private Employee Information

SB 1505 compels agencies to provide workers' names, home addresses, and phone numbers to a politically appointed board.

This raises serious concerns regarding:

- Worker privacy
- Personal safety
- Data security

No other workforce in Oregon is required to surrender private home contact information to an external board. This provision is unnecessary and inappropriate.

4. The Bill Misdiagnoses the Workforce Crisis

Supporters of SB 1505 suggest that the primary issue is a lack of worker “voice” or insufficient governance. However, the data and lived experience within the HCBS system point to different root causes:

- Chronic underfunding of Medicaid rates
- High acuity and increasing behavioral complexity
- Burnout driven by staffing shortages
- Housing and transportation barriers for workers

A new board does not address any of these structural challenges. Sustainable solutions require investment, not additional administrative layers.

5. The Bill Transfers Legislative Authority to an Unelected Board

SB 1505 delegates the power to set minimum standards—including wage recommendations—to a board that is not elected, not accountable to voters, and not responsible for balancing the state budget.

This raises concerns about:

- Fiscal oversight
- Accountability
- Separation of powers

Policy decisions with major financial implications should remain within the Legislature, not be delegated to an external body.

6. Oregon Already Maintains High Standards—The Gap Is Funding, Not Regulation

Oregon's HCBS system is among the most regulated in the nation. Providers already comply with extensive requirements related to:

- Training
- Background checks
- Licensing
- Safety protocols
- Person-centered planning
- Incident reporting and abuse investigation

The challenge is not a lack of standards. The challenge is the lack of resources to meet the standards we already have.

Conclusion

Oregon's direct support workforce deserves higher wages, better training, and stronger support. However, SB 1505 does not deliver those improvements. Instead, it creates redundant oversight, imposes unfunded mandates, compromises worker privacy, and risks destabilizing essential services.

For these reasons, I respectfully urge the Committee to oppose SB 1505 and instead pursue solutions that directly invest in the workforce and strengthen provider stability.

Thank you for your consideration.