



Wednesday, February 4, 2026

TO: Chair Jama, Vice-Chair Starr, and Members of the Senate Interim Committee On Rules and Executive Appointments

RE: Opposition to SB 1505

I respectfully urge you not to advance this bill.

Key points: Please...

- 1. Do not turn over your rulemaking authority to unelected persons.**
 - 2. Consider forming an advisory board.**
 - 3. Do not combine multiple, incredibly different sectors under one standardization.**
 - 4. Address where the problem actually exists.**
 - 5. Do not overlook the ripple effects of the proposed changes.**
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- 1. Please do not turn over your rulemaking authority to unelected persons.** This bill shifts critical community-based care and workforce decisions away from Oregon's existing legislative and governmental processes, which are transparent, constitutionally grounded, and widely understood, and into a new board structure without clear accountability to the public.
 - 2. Please consider forming an advisory board.** Rather than turning of your legislative authority, rewrite the bill to have an advisory board that can provide our elected officials with important information to achieve the concerns raised by the supporters of the bill, stakeholders, and providers. There is no example in the country of a workforce standards board with this breadth of authority successfully overseeing such a wide range of care settings. With the workforce standards board in place as currently proposed, there is no limit to the board extending their authority over other licensed or certified care settings, as well as other licensed or certified roles within a care setting.
 - 3. Please do not combine multiple, incredibly different sectors under one standardization.** Removing Community Based Care (CBC) and Adult Family Homes (AFH) is an obvious tactic to make this bill earlier and more palatable for lawmakers to pass. However, it is clear and evident following today's testimony from those who are sponsoring this bill that there is every intention to add CBC and AFH back into this bill after the workforce standards board is in place. Their testimony also included how diverse the intellectual and developmental disabilities (I/DD) sector is and the importance of ensuring each of the uniqueness of this group needs to be represented. Having to additionally add the appropriate amount of representation for the diversity of organizations also within CBC and AFH will create incredible conflicts and funding gaps. For example, the vast majority of CBC is private pay,



additionally, we are non-profit. If the answer to the funding gap is Medicaid, which is not able to receive the additional funding to make this work, then our private pay residents are faced with the burden of these additional costs. Applying standardized workforce and training requirements across this entire continuum, serving different populations in very different settings, is unreasonable and risks unintended consequences that will destabilize long-term care and replace individualized care with one-size-fits-all requirements.

4. **Please address where the problem actually exists.** Throughout the many hearings related to the various versions of this bill, note has been little to no mention of assisted living, memory care, or residential care communities, however, there were repeated remarks related to concerns stated related to home care agencies and the intellectual and developmental disabilities (I/DD). If there are concerns there, address them, rather than pulling other industries with a track record of providing their employees appropriate market rate wages, benefits, and predictable schedules.
5. **Please do not overlook the ripple effects of the proposed changes.** There is no example in the country of a workforce standards board with this breadth of authority successfully overseeing such a wide range of care settings. Arbitrarily increasing standards and wages with no regard to market will increase wages throughout the assisted living, memory care, and residential care communities; without doing so would result in wage compression.

For these reasons, I respectfully ask the committee not to advance SB 1505.

Sincerely,

Ryan Miller
President and CEO, Terwilliger Plaza