

## Oregon Department of Human Services

500 Summer Street  
Salem, OR 97301

February 5, 2025

Chair Gelser Blouin, Vice Chair Linthicum, and members of the Senate Committee on Human Services,

Thank you for the opportunity to provide testimony on SB 1534, relating to investigations of child abuse under ORS 418 and the regulation of child-caring agencies (CCAs).

The Oregon Department of Human Services (ODHS) shares the goal of making much needed amendments to the regulatory framework for child-caring agencies, with the highest priority placed on the safety and well-being of children who reside in or receive services from CCA providers.

SB 1534 proposes significant policy changes to Oregon's child welfare and licensing framework. The bill substantially expands the scope of who may be considered a victim and who may be subject to investigation under ORS 418. These provisions broaden the statutory reach of child abuse investigations and increase the overall complexity of Oregon's child abuse laws. ODHS has raised similar concerns in prior testimony related to Sections 4 and 6 of SB 1533, which include the same expansions to the scope of child abuse investigations.

In addition, SB 1534 would require certain ODDS-certified providers serving children who are not eligible for developmental disability services, or who are awaiting an eligibility determination, to obtain child-caring agency licensure. The bill also expands regulatory monitoring and compliance assessment requirements for CCAs, necessitating the development of new oversight processes, increased documentation, and integration of additional requirements into existing licensing and renewal activities.

Implementation of these provisions would require extensive rulemaking, training for staff and providers, and updates to information systems. The inclusion of an emergency



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clause further compounds these challenges by limiting the time available for a coordinated, consistent, and well-communicated implementation.

ODHS anticipates that SB 1534 would result in significant operational impacts and a substantial fiscal impact. The agency looks forward to the committee's presentation on the objectives of these policy changes, the intended scope of impact for Oregonians, and the data informing the proposals.

ODHS appreciates the opportunity to share these considerations and looks forward to continued engagement with the Oregon Legislature regarding the scope of ODHS child abuse investigations and regulatory reforms for child-caring agencies.

Sincerely,

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