

Submitter: Carl Bloms
On Behalf Of:
Committee: Senate Committee On Rules
Measure, Appointment or Topic: SB1505

Dear Chair Jama, Vice Chair Starr, and Members of the Rules Committee,

I write in strong opposition to SB 1505. My concerns are rooted in institutional design and administrative effectiveness. The bill creates an additional layer of governance, an HCBS Workforce Standards Board with rule-making and enforcement adjacent authority, within a system that already operates under extensive federal and state regulation and established stakeholder engagement processes. Adding another governing body introduces cost and complexity without clear evidence of improved outcomes.

From a public administration perspective, new regulatory venues are costly. SB 1505 establishes a standing board responsible for data collection, recurring review, and the adoption of standards enforceable through investigations and litigation pathways. These features generate governance overhead in the form of coordination burdens, compliance costs, and dispute resolution demands, diverting limited administrative capacity away from workforce stabilization and service quality.

The bill also undervalues the participatory infrastructure already embedded in Oregon's IDD and HCBS systems. ODDS routinely uses Rules Advisory Committees and maintains ongoing, open channels for community input that include self advocates, families, providers, labor, and state and county officials. These mechanisms reflect best practices in participatory governance and provide accountability and policy fit in a complex service environment. SB 1505 would displace, rather than strengthen, this inclusive model.

SB 1505 further shifts consequential policy authority to an appointed board of eleven members. Research on delegation consistently shows that moving decisions away from elected institutions can weaken accountability through principal agent problems and increased monitoring costs. Complex distributive decisions regarding wages, benefits, training, and service affordability risk being relocated into a specialized venue where sustained participation and agenda setting advantages may accrue to organized interests.

The bill's wage and benefit provisions also highlight a familiar policy failure. Standards have meaning only when they are sustainably funded. Although SB 1505 conditions implementation on legislative appropriation and federal approval, the result is ongoing uncertainty. Standards become contingent on future budgets, creating confusion for providers, workers, and service recipients while delaying real

improvements.

Most importantly, SB 1505 is redundant. Oregon has already commissioned and paid for the APD ODDS Rate and Wage Study, which used stakeholder engagement and labor market analysis to recommend updated rate models, including a direct care wage assumption of \$23.20 per hour with comprehensive benefits. The study also found that providers report paying wages above current rate-model assumptions, indicating that compensation pressures are already being absorbed beyond funded reimbursement levels. An evidence-based response is to implement and fund these recommendations, not to create a new permanent board to replicate analytic work.

Finally, SB 1505 risks introducing standardization pressures that conflict with the individualized nature of IDD services. Federal Medicaid rules require person-centered planning, and disability rights norms emphasize choice and community integration. Workforce mandates and compliance burdens can indirectly reduce service availability and diversity, narrowing real choices for people with disabilities and their families.

For these reasons, I respectfully urge the committee to vote NO on SB 1505. Oregon can advance workforce stability more effectively by using existing participatory governance structures and fully implementing the Rate and Wage Study's evidence-based recommendations, rather than adding a new board that increases complexity, diffuses accountability, and delays meaningful progress.

Best Regards,
Carl Bloms