

Dear Members of the Oregon State Legislature,

I am writing to express my strong opposition to SB1532, specifically the provision that would cut reimbursement rates to agencies employing Direct Support Professionals (DSPs) who reside in the same home as an individual with intellectual and developmental disabilities (I/DD).

The Fiscal Analysis states, "***DHS assumes 28% of in-home support costs in the Intellectual/Developmental Disabilities program are attributable to services provided by DSPs who live with their client, were directly recruited by the client, and are unlikely to have other clients.***" This statement is not entirely correct, as many DSPs who reside with an individual also provide support to other I/DD individuals outside of the home. Had there been solicited feedback requested from provider agencies, relevant data may have been supplied.

**"The overhead costs to be excluded from the new rate model include expenses related to travel time between clients, employer supervision and performance meetings, missed appointments, training, administrative activities and other indirect costs."** This statement, also taken from Fiscal Analysis, is based upon false assumptions and does not take into consideration the numerous administrative responsibilities required by Oregon Administrative Rules (OARs):

1. Provider agencies are required to have the same level of supervision over DSPs regardless of where they live.
2. SMAs must provide employees with timely access to a supervisor & each supervisor must supervise no more than 20 full-time equivalent DSPs (OAR 411-450-0090)
3. There is no evidence that an individual or DSP is more or less likely to miss an appointment when they live together.
4. All DSPs must meet the same training requirements regardless of their living situation or relationship with the individual receiving supports (OAR 411-323-0050)Mandatory Training for DSPs:
  - a. CPR/First Aid
  - b. 12 hours of job-related in-service training required annually.
  - c. Training on support documents for every individual the staff member will support.
  - d. Six hours of pre-service training prior to supporting an individual (OAR 411-450-0080)
  - e. DSPs with SMAs must have an additional 12 hours per year of training related to the delivery of attendant care or skills training supports (OAR 411-450-0090)
5. Administrative activities are not decreased solely because of the individual and DSP living situation. All DSPs provide the same level of support and require the same level of oversight and supervision, regardless of their relationship to the individual.
6. Agencies must follow the same guidelines for agency management and personnel practices (OAR 411-323-0050):
7. All DSPs must meet mandatory abuse reporting requirements annually.
8. Agencies must conduct background checks at least every two years on all staff.
9. Ensure all staff meet general qualifications, including monitoring & documentation of training.

10. Maintain personnel files.
11. Agencies must follow all operating standards under( OAR 411-323-0055)
12. Agencies must have and implement policies & procedures under (OAR 411-323-0060)
13. Agencies must follow abuse and incident handling & reporting guidelines under (OAR 411-323-0063)
14. Standard Model Agencies (SMAs) have additional administrative duties per (OAR 411-450-0090):
  - a. Additional policy requirements
  - b. Provide access to paid training in ODDS-approved behavior intervention curriculum when required. (OIS)
  - c. Integrated support coordination.
  - d. Develop or acquire, maintain, and follow written protocols specific to identified risks and provide training on the protocols.
  - e. Participate in ISP meetings when requested.
  - f. Agencies must develop, and update as needed, an Individualized Implementation Strategy and provide training on the strategy .
  - g. Agencies must submit quarterly written reports to each individual's case management entity.

Reimbursement reductions fail to recognize the true cost of delivering high-quality, person-centered care. Agencies **must** cover training, supervision, compliance requirements, emergency backup systems, and administrative oversight. Cutting rates without reducing responsibilities places agencies in an untenable position and jeopardizes service quality.

The examples above show clearly the high level of oversight required for DSPs, whether they live with an individual or not, to effectively meet all OARs set forth by ODHS.

Effective governance often depends on collaboration and adaptability rather than one-size-fits-all mandates. I encourage you to consider whether this proposal allows for sufficient input and practical implementation across diverse communities throughout Oregon.

Finally, I respectfully ask that you ensure any major policy changes are supported by comprehensive data and open public dialogue. Oregonians deserve transparency and thoughtful deliberation before significant legislative action is taken.

I urge you to vote **no** on SB1532 or, at minimum, delay its advancement until these concerns can be thoroughly addressed. These specific changes should not be enveloped into the middle of SB1532 but should be addressed independently. The individuals and families who rely on these services deserve stability, continuity, and the highest standard of care.

Thank you for your time and service to our state.

Respectfully,

Kristi Bonham  
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