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April 28, 2025

Dear Chair Bowman and Members of the House Committee on Rules,

On behalf of the Roseburg Area Chamber of Commerce, and the businesses, organizations and individuals we represent throughout Roseburg and Douglas County, we urge you to oppose HB 3838. The Roseburg Area Chamber opposes shifting any wage and employment decisions away from the Legislature, an elected body, to an unelected body with sweeping regulatory power to set standards for an entire industry.

One of most critical industry sectors in any community, is healthcare. In a rural community, with an older population (approximately 26% of Douglas County's population is over the age of 65), it is even more crucial. One of the Roseburg Area Chamber's major concerns about this approach is the risk created for providers/employers, particularly small businesses, both non-profit and for-profit.

Many of our local care providers are small and medium-sized businesses and non-profits, that during the best of times operate on slim profit margins. It is a certainty that the creation of a Home and Community-Based Services Workforce Standard Board would lead to higher operating costs, raising the cost for Medicaid-funded care providers and our citizens without any proposed mechanism for additional funding or reimbursement. Many providers are already paying wages beyond the state-funded reimbursement rate.

Additionally, care providers will face the added burden of bureaucracy. Oregon has some of the strongest protections in the U.S. Direct Support Professionals operate in a heavily-regulated industry with multiple agencies having authority and oversight including ODHS, OSHA, BOLI, OHA, CDDP's and more. HB 3838's creation of an unelected regulatory body introduces unnecessary bureaucracy and uncertainty for employers, with the potential to undermine the authority of these existing state agencies.

HB 3838 threatens the stability of this critical healthcare industry and the well-being of our citizens who need these services. We fear the passage of this bill would exacerbate the risk of closure of existing care facilities and home care service entities, and be a deterrent for new businesses at a time when we greatly need these providers.

We respectfully request your "no" vote on HB 3838 for the protection of home and community-based care providers, their employees and the very important citizens they serve.

Respectfully,

ROSEBURG AREA CHAMBER OF COMMERCE
DOUGLAS COUNTY CHAMBER OF COMMERCE

Debra L. Fromdahl, IOM
President & CEO



To advocate for and be the voice of the business community in the greater Roseburg area.

To strengthen, enhance and protect our members through political advocacy, economical development, community promotion and member programs and services.