

Testimony of Karen L. Dodd  
Administrator, Portland Center for Assisted Living  
Before the Joint Standing Committee on Health and Human Services  
Tuesday, April 1, 2025 at 1:00 pm

**In Opposition to:**

**L.D. 979     Resolve, Regarding Legislative Review of Chapter 113: Assisted Housing  
Programs Licensing Rule, a Late-filed Major Substantive Rule of the Department of  
Health and Human Services**

Senator Ingwersen, Representative Meyer, and Honorable Members of the Committee on Health and Human Services:

Good afternoon. My name is Karen Dodd, and I am the Administrator of The Portland Center for Assisted Living, a 170-bed facility in Portland, including a 56-bed Memory Care Unit. I am here to express my opposition to LD 979 as currently drafted, specifically the requirement for higher staffing ratios in residential care facilities and the requirement for facilities with more than 160 residents to employ two Administrators.

Assisted living facilities in Maine are facing significant financial pressures. Federal and state uncertainties around Medicaid and Social Security threaten the stability of facilities like mine, where 97% of the residents rely on Maine Care. Unfunded mandates—including increased staffing ratios and the requirement of a second Administrator—add further strain. The staffing ratio changes would require 23 additional full-time employees, increasing costs by \$1.5 million, while Portland's potential minimum wage increase to \$20 an hour would further compound our financial challenges.

Our facility has not seen an increase in resident acuity to warrant such a large addition to our staffing, but rather a shift toward younger individuals with behavioral health needs and fewer complex health problems. Many come from unstable living situations, and we provide them with the stability and the care they need to thrive. If facilities like ours close due to financial burdens, these individuals will have nowhere to go, placing added strain on hospitals, shelters, and public safety services.

While I understand the intent behind these regulations, it is the impact I am in opposition to. I question the need for a second Administrator as this would create staff confusion, inefficiencies, disrupt the leadership structure, and it raises a lot of concerns regarding shared licensure. A well-supported Administrator, backed by a strong leadership team, is sufficient to manage a facility of our size. If this requirement is based on resident numbers, staffing ratios, or regulatory outcomes, I respectfully request further justification.

I appreciate the opportunity to share my concerns and thank the Committee for your time and consideration.