

Good afternoon

My name is Sue Arsenault, a board member of the association and the owner of Align Home Care in Falmouth. Align Home Care has proudly operated a successful business for the past eight years, providing non-medical in-home care for older adults in the greater Portland area.

We appreciate the focus you have made on providing rules to ensure consistency and accountability practices of Personal Care Agencies across Maine. We all strive to provide exceptional care to older adults living in Maine and we realize how critical our services are for people to be able to remain safe and independent in their own homes.

As such, we believe it is vital for policymakers to work collaboratively with providers like us because we understand the operational realities and pitfalls of this industry.

I'd like to take a few moments to talk about the **current training compliance timeline for caregivers**. As is currently outlined, it is presenting **significant challenges** for our agencies.

Unfortunately, the timeline outlined in the new rule doesn't align with the upcoming rollout of the Direct Support Worker, or DSW, training curriculum. Along with this misalignment, we are also facing **significant training costs associated with the deadlines**.

Because of this, we respectfully ask for your consideration in **delaying enforcement of the new requirements** until the DSW curriculum is fully implemented and accessible to all agencies.

That said, I want to take a moment to say how **encouraged I am by the Office of Aging and Disability's outreach and willingness to collaborate with our expertise in home care**. Align Home Care was invited to participate in a pilot program alongside several other agencies to support a successful rollout of the DSW curriculum. I've had the opportunity to preview some of the training content, and I'm genuinely excited by the **quality and flexibility** of the format and how it will allow both DSPs and PSS workers to work more fluidly across care environments.

Prior to the new rules, many agencies like ours have been employing caregivers who have a DSP certificate, an expired CNA, or simply years of valuable experience but no formal credential. As a part of your consideration in delaying the enforcement of the new requirements, we would deeply appreciate **clarification on whether those caregivers might be eligible to "test out" of training**, so they can continue serving clients they already support. These caregivers do so successfully through **strong oversight by management & customized care plans**. These caregivers have delivered safe & compassionate care tailored to each client's unique home environment and needs.

So again, we respectfully ask that you **reconsider the August deadline** until the DSW program is fully available.

Thank you for your time, and for your commitment to working with