

**From:** Kyra Pettit

**To:** House Health and Social Services

**Cc:** joeybosworth@gmail.com

**Subject:** HB 96

**Date:** Monday, March 24, 2025 8:42:14 PM

Dear Representative Prax,

I am a caregiver living in Palmer. I'm writing in support of HB 96 because caregivers and clients need

to be able to advocate for themselves. "Criteria" and "eligibility" alone should not decide whether or

not someone receives services. The "system" should not get to decide— it's the people who get the

services and who provide the services who should be able to convey their needs, and then have their

needs sufficiently met.

People should not have to worry if they meet certain standards, and they certainly should not have to

"get worse" before they get the care promised to them. By that time, the damage is done, irreversible,

and it becomes too late.

People with invisible disabilities should not be cut off because someone else is making the determination that they don't need help. When there are cuts to Medicaid, people are

estranged from

the system, and with each cut more help is lost within the community. That is not a rational system

to apply. That is not a system to be proud of.

HB 96 will give us and our clients a voice to raise issues like this and make the system one that we

can all be proud of. Listen to our voices.

Thank you,

Kyra Pettit

**From:** Vanessa Liston

**To:** House Health and Social Services

**Subject:** HB 96

**Date:** Thursday, March 27, 2025 3:14:37 PM

Dear Representative Prax,

Hello, my name is Vanessa Liston, and I'm a caregiver for my youngest son who was a victim of a catastrophic car accident. He needs 24 hr care and I've been taking care for him 26 yrs in Alaska.

I'm really hoping HB 96 bill will go through to improve the life he has!

The Advisory board alone would give this profession a real leg up and then we as caregivers can feel meaning and be a part of decisions that involve us!! So important. 70% of money designed to care for the people is only fair too. Caregivers have the same bills as everyone else has. So, so needed!

This bill could upgrade the caregivers and give capability to hire strong caregivers that have pride in their job!!

This is so important to the folks with disabilities and would be a game changer for growth for the future!!

I pray this Bill gets approved.

Thank You for your time.

Sincerely,

Vanessa Liston

Sent from my iPhone

**From:** Shanah Kinison  
**To:** House Health and Social Services  
**Cc:** JoeyBosworth@gmail.com  
**Subject:** I support HB96  
**Date:** Monday, March 31, 2025 2:02:12 PM

Dear Representative Prax,

My name is Shanah Kinison. I live in Haines, AK.

I have been caring for Alaska's most vulnerable for over 30 years. I started out in elder care, palliative/ end of life care and have moved towards mental health conditions, disability, and chronic degenerative illness. I currently work with a child with disabilities and complex medical needs.

I have been trying to recruit another caregiver to help me with my client and in two years, I haven't found anyone. This leaves me unsupported and my client without enough care.

I see the lack of training, job security, and ability to make a living wage as the catalyst for caregivers rapidly leaving the profession. There is already a huge shortage of care workers in Alaska and nationwide. This adds stress to an already fragile system.

Training is crucial in this profession. It is becoming urgent as more of Alaska ages and requires specialized skills in geriatrics, dementia, Alzheimer's, and chronic conditions.

As things stand now, agencies send caregivers into homes untrained and unprepared. It's put upon the client and their families to train their own providers. This is unsafe and unjust for all involved and can lead to injury or death, job dissatisfaction, and undue stress.

For too long it's been the prerogative of the agencies as to what they want to pay the hardworking

people who are actually providing the essential care. HB96 will ensure that caregivers get their fair share of the allocated funds from Medicaid. This will end the disparity in wages among caregivers and help end the exodus out of the caregiving workforce.

I support HB96 because it will address the shortage of caregivers in Alaska, the disparity in wages & training, and resolve other issues facing caregivers & their clients.

HB96 is an essential bill of hope and promise that will lift up and support caregivers, their clients and families, and all Alaskans.

Thank you so much for your careful consideration and dedication to Alaska.

Shanah Kinison.

**From:** Paula Parrish  
**To:** House Health and Social Services  
**Subject:** Letter of Support for HB 96  
**Date:** Wednesday, April 2, 2025 5:18:22 PM

Dear Representative Prax,

I'm Paula Parrish, I live in Anchorage, AK, I've been a caregiver for about 8 years, I care for my son who has Down syndrome and autism, he is not verbal. It is hard for someone else to come in and work with him, to understand what he needs, communication is difficult, you have to guess what he wants to say, and what he needs. You must know his routine to work with him, make him happy, and get his basic needs. I need to give him all his things, prepare his meals, dress him, help him with his hygiene, get him into the community, help him stay within his budget, take him to see his friends, take him to his doctors' visits, and take him out to different places in the community to have a social life.

I've seen that there are caregivers out there, I don't know their situations, but I know they are getting paid at a lower rate. What HB96 will do is give a fair share of the rate to caregivers for wages and benefits across the board, and that would be better for all. This bill will also create an advisory board that will resolve issues related to caregiving, it will also give benefits to caregivers such as training to caregivers. Also, valuable resources and information can be created and accessed across the board for all caregivers to share and help each other.

I thoroughly support HB96. It is needed for people without a voice, like my son and many others. I believe HB96 needs to be supported and passed, having it will be of great benefit for caregivers and for many others.

Thank you,  
Paula Parrish

**From:** Amy Backas  
**To:** House Health and Social Services  
**Cc:** [joeybosworth@gmail.com](mailto:joeybosworth@gmail.com)  
**Subject:** Letter of support for HB96  
**Date:** Wednesday, March 26, 2025 5:51:37 PM

Dear Representative Prax,

I am writing in favor of HB 96 because I am a home care provider and have been for 20 years now. The caregiving profession has been virtually invisible up until just recently when we're finally demanding fair wages and fair rights. The HB 96 would give a fair share of 70% of Medicaid rate funds to go to the actual caregivers within agencies instead of the administrators.

Also, of utmost importance would be the establishment of the Home Care Employment Standards Advisory Board within the department of health in Alaska. This would create a means by which caregivers and clients could access resources, guidance, information and general support creating a more stable and reliable community of health care workers which benefits the health and welfare of all.

Thank you,  
Amy Backas.

[Sent from Yahoo Mail for iPhone](#)

**From:** Bryan Hays  
**To:** House Health and Social Services  
**Cc:** [joeybosworth@gmail.com](mailto:joeybosworth@gmail.com)  
**Subject:** Letter of support HB96  
**Date:** Thursday, March 27, 2025 4:08:20 PM

Dear Representative Prax,

I'm writing in support of HB96, because we have to set a fair share of the rate for caregivers at 70% to attract more people into the field. It's hard to continue to live as a caregiver when you have to work 2 or 3 jobs, and when you can get paid more working at a grocery store. Right now, only 2 agencies have unionized, and with their union contracts, caregivers are paid more fairly, but several of the agencies are still paying people \$14-\$15 an hour. There is no consistency, and a standard is not being followed, some people get more money per hour than others in the same agency, depending on who does the hiring paperwork. We need to establish an advisory board, so that caregivers can have their voices heard in regards to regulations or the amount of time designated per task. It will be a massive help to caregiving as a profession, because as of now the people who are making the decisions on what tasks are given and how long per task, do not know the work. 15 minutes of escort time to get to and from doctor's appointment is not enough, with my mom, it takes at least 20 minutes to get to and from the doctor's office, not counting getting her into and out of the car. And I live just outside of Kenai, what about people who live in Nikiski or Sterling? These times do not work in Alaska. Bathing is another thing, 15 or 20 minutes is not enough for bathing, when they are physically disabled and need help with everything. I have never done a bathing in those circumstances that takes 15-20 minutes, it usually takes 30-45 minutes. Double billing is another issue. We have been told that we can't be paid while accompanying the client to their doctor's appointment, because of the claim that doctors are being paid already, and we can't get paid too. Doctor's are doing their job, and we are doing ours, like reminding our clients what they need to consult the doctor about, helping them in the bathroom etc. Decisions that have been made a long time ago, regarding tasks and times for example, are affecting caregivers and our clients drastically.

Thank you,  
Bryan Hays

**From:** Susan A  
**To:** House Health and Social Services  
**Subject:** Public Testimony: HB 96  
**Date:** Tuesday, March 25, 2025 8:25:56 PM

Public Testimony: HB 96 - Personal Care Services Employment Standards  
Subject: Opposing HB 96 and Highlighting Legal, Constitutional, and Practical Issues  
Testifier: Susan Allmeroth  
Affiliation: Myself  
Location: Two Rivers

Honorable Chair and Members of the Committee,

I come before you today to testify against House Bill 96 (HB 96), which seeks to create a framework for wage and payment standards for personal care services. While I understand the bill's intent to improve the compensation and employment conditions for workers in the home care industry, I believe this bill contains numerous legal, constitutional, practical, and policy issues that require immediate attention.

I urge the Committee to carefully consider the following problems before proceeding with HB 96.

#### 1. Overlapping Regulations with Existing State and Federal Laws

**Overlap with Medicaid and Federal Regulations:** HB 96 introduces payment structures for personal care services, particularly around wage compensation, which overlap with established Medicaid reimbursement rates. The federal Medicaid program already regulates the reimbursement of personal care services, and HB 96's mandate for Medicaid funds to cover certain wage increases (starting in 2026) could conflict with federal guidelines on allowable Medicaid reimbursements (42 U.S.C. 1396n).

This raises significant questions about the state's ability to set wage mandates that may conflict with federal regulations, risking non-compliance with federal law and potential loss of Medicaid funding.

**State Wage Laws Overlap:** The bill's provision on mandated wage increases (Sections 2 and 3) conflicts with the state's existing wage laws, including minimum wage requirements. By creating an additional tier of wage requirements for personal care workers, the bill risks duplicating the enforcement mechanisms already in place under the Department of Labor and Workforce Development.

#### 2. Lack of Clear Standards for Compliance and Enforcement

**Unclear Implementation Timeline:** Sections 2 and 3 of HB 96 set wage mandates for personal care workers, but the timeline for these wage increases is unclear. While the bill mandates payments from Medicaid funding starting in 2026, there is little clarity on how these payments will be tracked, how the compensation structures will be enforced, or how agencies will ensure compliance.

The lack of enforcement mechanisms in the bill raises concerns about whether it will truly benefit workers or if it will simply add bureaucratic layers without real accountability.

**No Clear Role for State Oversight:** The bill establishes the Home Care Employment Standards Advisory Board to advise on payment rates (Section 44.29.930). However, there is no clear

mechanism for how the board will coordinate with other agencies, such as the Department of Health (DOH) or the Department of Labor. This lack of coordination between the advisory board and existing state agencies will likely lead to duplication of efforts and inefficiencies in monitoring and implementing wage standards.

### 3. Corporate Accountability and Risk of Abuse

**Risk of Diverting Funds Away from Workers:** HB 96 provides for a substantial portion of Medicaid funds to be directed toward wage payments for personal care workers. However, there is no provision in the bill that mandates transparency in how these funds are disbursed to ensure that they are used strictly for wage increases and not diverted for other purposes. This creates a risk that agencies may not allocate funds properly, which could ultimately undermine the bill's goal of improving worker compensation.

Without proper oversight, there is a significant risk that the funds could be misused by agencies, leading to unintended financial burdens on workers or taxpayers.

### 4. Constitutional Concerns

**Potential Violation of State Sovereignty:** By mandating the use of Medicaid funds for wage increases, HB 96 may conflict with constitutional principles surrounding state sovereignty. The federal government already controls Medicaid funding, and while states have some flexibility in administering Medicaid, the bill's mandate for specific wage expenditures could be seen as an overstep of state authority, particularly if it leads to federal pushback or penalties.

This issue could result in costly legal challenges, potentially jeopardizing Alaska's Medicaid funding if the bill is found to be inconsistent with federal law.

### 5. Impact on Marginalized Communities

**Potential Negative Impact on Service Access:** The bill's strict wage mandates may result in higher costs for personal care services, which could in turn drive up costs for consumers or limit access to care. This is especially concerning for marginalized communities, including low-income Alaskans, elderly individuals, and people with disabilities, who already struggle to afford necessary services.

If the cost of personal care services rises due to increased wages without a corresponding increase in service reimbursement rates from Medicaid, it could result in reduced access to care for those who need it most.

### 6. Economic and Fiscal Impact

**Unfunded Mandates and Fiscal Strain:** The bill mandates wage increases without identifying clear funding sources, particularly in the later years (i.e., 2026 and beyond). Without clear funding mechanisms or reimbursement rate increases to match these wage mandates, this bill places undue fiscal strain on the state's Medicaid system and personal care service providers. This could result in budget deficits or forced cuts to other vital services.

The bill's lack of fiscal transparency raises concerns about the economic impact on the state's healthcare system and could lead to a budgetary crisis if Medicaid reimbursement rates are not adjusted to account for the wage mandates.

## 7. Inadequate Protection for Personal Care Workers

**Lack of Worker Protections:** Although the bill attempts to increase wages for personal care workers, it lacks robust protections for these workers in terms of job security, training, and working conditions. Without comprehensive worker protections, such as measures for safe working environments and ongoing professional development, the bill falls short of addressing the broader issues faced by personal care workers.

Personal care workers often work in challenging environments, yet the bill does not provide a clear framework for ensuring their long-term well-being or professional advancement.

### Conclusion

In conclusion, while HB 96 aims to address important issues related to wage compensation for personal care workers, the bill is fraught with legal, constitutional, and practical issues that undermine its effectiveness. From the overlaps with existing Medicaid regulations to the lack of transparency and clear enforcement mechanisms, this bill will likely fail to achieve its goals and could potentially harm both workers and service recipients.

I respectfully urge the Committee to reconsider HB 96 and work toward a more balanced, legally sound solution that truly addresses the needs of personal care workers without creating unnecessary legal conflicts or financial burdens.

### Suggested Fixes for HB 96: Personal Care Services Employment Standards

#### 1. Address Overlaps with Existing State and Federal Laws

##### Fix for Medicaid and Federal Regulations Overlap:

**Proposed Amendment:** Modify the bill to align with existing Medicaid reimbursement standards. Instead of mandating wage increases directly through state legislation, allow for a collaborative process between the state and federal Medicaid authorities to review and adjust reimbursement rates to meet wage standards.

**Rationale:** This approach ensures that the bill complies with federal Medicaid requirements while still allowing for fair wage increases. It avoids potential conflicts with federal law and ensures the state's ability to maintain Medicaid funding.

##### Fix for State Wage Laws Overlap:

**Proposed Amendment:** Explicitly state in the bill that the wage mandates for personal care services apply in addition to, and not in conflict with, existing state wage laws, particularly those governing minimum wage. Create a section in the bill to clarify that personal care workers are exempt from certain minimum wage provisions if they are subject to higher wage standards under the bill.

**Rationale:** This clarification removes confusion about the applicability of existing wage laws and prevents the risk of duplicating enforcement or creating conflicting requirements.

Or just wait until they get rid of it or fix it in the federal law. Now they know what to tell them, watch what happens next, and who it is who acts.

#### 2. Clarify Compliance and Enforcement Mechanisms

##### Fix for Unclear Implementation Timeline:

**Proposed Amendment:** Provide a detailed, phased implementation plan with clearly defined milestones, starting with a review and assessment in 2024, followed by annual adjustments to wage standards in consultation with relevant agencies. Include a clear timeline and process for the phased implementation of wage increases.

Rationale: This fix ensures that the implementation of the wage mandates is done in a controlled and predictable manner, allowing service providers to plan accordingly and reducing confusion or delays.

Fix for Clear Role of State Oversight:

Proposed Amendment: Clarify the role of the Home Care Employment Standards Advisory Board by specifying that it will work directly with the Department of Health and the Department of Labor to ensure smooth implementation and ongoing compliance. Include a requirement for an annual public report on the state's progress in meeting wage standards.

Rationale: This ensures coordination between all involved state agencies and provides transparency through regular reports. It also helps to prevent duplicative or fragmented efforts that could impede progress.

### 3. Ensure Corporate Accountability and Prevent Misuse of Funds

Fix for Risk of Diverting Funds Away from Workers:

Proposed Amendment: Require detailed, transparent reporting on the distribution of Medicaid funds used to meet the wage mandates. Include an auditing process to ensure that funds allocated for wage increases go directly to the workers and are not diverted for administrative purposes or other expenditures.

Rationale: This measure ensures accountability in the disbursement of funds, preventing potential misuse and ensuring that the funds are used as intended to benefit workers.

### 4. Resolve Constitutional Concerns

Fix for Potential Violation of State Sovereignty:

Proposed Amendment: Amend the bill to allow for a joint review process between the state and the federal government to ensure compliance with Medicaid funding requirements.

Additionally, include provisions for revisiting the bill in 2026 to assess its constitutional impact, particularly in relation to federal law.

Rationale: This amendment ensures that the bill does not conflict with federal law and provides a mechanism for addressing any future legal challenges related to state sovereignty.

### 5. Minimize Negative Impact on Marginalized Communities

Fix for Potential Negative Impact on Service Access:

Proposed Amendment: Add a provision that ensures that Medicaid reimbursement rates will also be reviewed and adjusted in conjunction with wage increases to ensure that there is no negative impact on service access or affordability for low-income populations, the elderly, and those with disabilities.

Rationale: By ensuring that reimbursement rates keep pace with wage increases, this amendment prevents the rise in service costs that could disproportionately affect marginalized communities.

### 6. Ensure Fiscal Responsibility and Transparency

Fix for Unfunded Mandates and Fiscal Strain:

Proposed Amendment: Include a fiscal impact analysis section in the bill that outlines the estimated costs associated with the wage increases and identifies sources of funding. This could include federal reimbursement adjustments, state budget allocations, or a combination of both.

Rationale: This fix ensures that the state is prepared for the financial impact of the bill and that the necessary funding sources are identified and secured. It also provides transparency for stakeholders regarding the bill's fiscal impact.

## 7. Strengthen Worker Protections

Fix for Lack of Worker Protections:

Proposed Amendment: Add provisions to the bill that require service providers to implement basic worker protections, including safety standards, training requirements, and professional development opportunities for personal care workers. Additionally, create a task force to review the ongoing working conditions for personal care workers.

Rationale: This fix addresses the broader issues faced by personal care workers, ensuring that their well-being is prioritized alongside wage increases. It helps ensure that workers are provided with the tools and resources needed to succeed and remain safe on the job.

The proposed fixes to HB 96 (or similar legislation) can certainly help mitigate some of the potential harm caused by private corporations and companies, particularly in areas where corporate practices might exploit the system, underfund essential services, or underpay workers. However, the level of protection these fixes provide depends on how well the legislation is crafted and implemented.

How the Fixes Could Protect Against Private Corporations:

Corporate Accountability:

Protection: By incorporating strict corporate accountability measures, the fixes can require private companies involved in personal care services to adhere to strict standards of pay and care quality. This would limit opportunities for corporations to exploit workers by underpaying them or skimming profits from essential services.

Fix: Enforcing transparency in financial reporting and requiring corporations to demonstrate that they are using funds for intended purposes (i.e., worker wages and care services).

Wage Protections:

Protection: The fixes would ensure that personal care workers are paid fair wages, regardless of corporate profits. By setting minimum wage requirements and ensuring Medicaid reimbursement rates are adequate to meet these wages, you prevent companies from cutting costs by underpaying workers.

Fix: Mandating that private companies receiving Medicaid funds for personal care services must use a significant portion of those funds to cover worker wages and benefits, leaving less room for corporate profit-taking at the expense of workers.

Preventing Exploitation of Medicaid Funds:

Protection: The fixes could impose stringent guidelines on how Medicaid reimbursement funds are allocated, reducing the opportunity for private companies to misappropriate these funds, which could otherwise be funneled into profits rather than used to improve care quality and wages.

Fix: Ensuring that Medicaid funds are only used for care services, worker salaries, and other direct costs, rather than excessive corporate overhead or profit margins.

#### Worker Protections:

**Protection:** Legislation can enforce minimum staffing levels and safeguards to prevent private corporations from reducing staff or compromising care quality in favor of profit. Workers would also be protected through provisions for paid leave, healthcare, and other benefits that ensure they are treated fairly.

**Fix:** Mandating that private companies provide certain benefits or protections to workers, such as healthcare, overtime pay, and safety measures.

#### Transparency and Reporting Requirements:

**Protection:** By requiring corporations to publicly report how funds are used, and how they comply with state and federal guidelines, you can prevent abuses by making it harder for companies to divert funds for profit maximization.

**Fix:** Introducing mandatory reporting on employee wages, working conditions, and service quality to ensure compliance with standards, making it more difficult for companies to prioritize profits over care.

#### Penalties for Non-Compliance:

**Protection:** The fixes would introduce strict penalties for private companies that fail to meet the minimum requirements, making it financially unappealing for them to exploit workers or cut corners in care services.

**Fix:** Establishing fines or other penalties for private companies that violate wage, staffing, or care standards. This would create a strong deterrent to exploitative practices.

#### Supporting Local and Community-Based Providers:

**Protection:** If the fixes encourage or incentivize the use of local, nonprofit, or community-based care providers over large corporations, it could create a system where profits are reinvested in the community, rather than extracted by large private entities.

**Fix:** Providing grants, tax incentives, or other support to community-based care providers, which are less likely to exploit workers for profit.

#### Reduced Corporate Control Over Policy Decisions:

**Protection:** Stronger state-level oversight reduces the power that large corporations might wield over the policies affecting personal care services, thus preventing them from lobbying for policies that benefit them at the expense of workers and patients.

**Fix:** Ensuring that the state legislature retains control over critical decision-making in Medicaid funding and reimbursement rates, limiting the influence of corporate lobbyists.

#### Potential Gaps in Protection:

While these fixes could provide significant protection against exploitative corporate practices, it's important to note that there may still be risks depending on the strength of enforcement mechanisms and the corporate lobbying power in your state. If the laws are not enforced rigorously, or if private corporations are able to lobby for exemptions or loopholes, there could still be ways for companies to evade the intended protections.

To close these potential gaps, it's crucial that the fixes include:

Strong enforcement mechanisms such as regular audits and independent oversight.

Clear definitions and penalties for corporate misconduct.

Support for workers to ensure they have the power to report abuses without fear of retaliation.

The fixes in HB 96 could provide substantial protection against private corporations by holding them accountable for their treatment of workers, ensuring fair compensation, and making sure funds are properly allocated to care services. However, the effectiveness of these protections depends heavily on the details of the legislation and its enforcement. Strong, comprehensive protections can significantly reduce corporate exploitation in the personal care services sector.

So, the structure works to ensure no one — whether worker, consumer, or small business owner — is left behind or treated unfairly, especially in favor of corporate interests. The goal is to create a more just system where everyone has a fair opportunity.

By implementing these suggested fixes, HB 96 will become a more legally sound, practically viable, and ethically responsible bill. The proposed changes address key legal issues, enhance protections for workers, ensure proper oversight and fiscal responsibility, and prevent potential negative impacts on consumers and marginalized communities. I urge the committee to adopt these fixes to make HB 96 a truly beneficial and workable piece of legislation for all stakeholders involved.

Thank you for your consideration.

Susan Allmeroth

Two Rivers

Myself

**From:** Kori Mateaki

**Sent:** Friday, December 19, 2025 8:09 PM

**To:** Riley Nye

**Subject:** Re: Please Review: Important Caregiver Agency Legislation

Dear Representative Prax,

Thank you for the opportunity to comment on **HB 96**. I appreciate the intent behind the bill to increase wages for Personal Care Assistants (PCAs). Direct care workers are the backbone of Alaska's long-term care system, and fair compensation is essential to workforce stability.

However, I must respectfully submit **formal non-support of HB 96 as written**, due to serious concerns about its unintended consequences for Medicaid provider sustainability, quality oversight, and participant safety.

Under HB 96, agencies would be required to pass through **70% of billed Medicaid revenue to PCAs in the first year**. While this may increase hourly wages in the short term, it **eliminates the financial capacity of agencies to meet federally required administrative, clinical, and compliance functions**.

Medicaid home care agencies are not simple payroll pass-through entities. Agencies are legally and operationally responsible for:

- Supervision, training, and competency validation
- Nurse oversight and care coordination
- Scheduling and coverage continuity
- Background checks and credentialing
- Workers' compensation, liability, and professional insurance
- Payroll taxes, benefits, and health insurance
- Compliance monitoring, audits, and corrective actions
- Incident reporting, investigation, and quality assurance

These functions are **not optional** under Medicaid. When reimbursement structures fail to fund them, agencies are forced to make untenable choices: reduce supervision, eliminate benefits, rely on volume over quality, or exit the market entirely.

HB 96 effectively **incentivizes bulk, high-volume care models** while **penalizing smaller, community-based agencies that provide higher-touch oversight and clinical support**.

This undermines the very safeguards Medicaid requires and increases long-term risk to participants, caregivers, and the State.

Importantly, this bill **shifts financial pressure downstream without addressing the core issue**: Medicaid rate adequacy. If the Legislature wishes to raise PCA wages sustainably, the solution must be a **corresponding increase in Medicaid reimbursement rates**, not a fixed revenue split that destabilizes providers.

Without such adjustments, HB 96 risks:

- Reduced supervision and training
- Increased critical incidents
- Higher caregiver turnover due to lack of benefits
- Agency closures, especially in rural and underserved areas
- Greater reliance on emergency and institutional care

I strongly support caregiver wage growth — but it must be achieved through **rate reform, cost-based analysis, and sustainable funding models** that preserve compliance and quality. HB 96, as currently structured, does not meet that standard.

I respectfully urge you to reconsider support for HB 96 in its current form and to engage providers, caregivers, and Medicaid experts in developing a solution that strengthens — rather than weakens — Alaska’s home care system.

Thank you for your time and consideration. I would welcome the opportunity to discuss this further.

Sincerely,

**Kori Mateaki, RN**

**Turnagain Social Club**

**From:** Jack Pomerantz

**Sent:** Tuesday, December 23, 2025 9:30 AM

**To:** Riley Nye

**Subject:** Re: Please Review: Important Caregiver Agency Legislation

Dear Representative Prax,

Thank you for reaching out and for your work on HB 96. I appreciate your focus on stabilizing Alaska's home care workforce and addressing the very real demographic and labor challenges facing our state.

I strongly support the intent of HB 96, particularly its emphasis on improving recruitment and retention of direct care workers. In that spirit, I would like to suggest that consideration be given to including a targeted amendment to **AS 23.10.060(d)(12)** as part of this legislative effort.

Currently, the statute provides an overtime exemption only for "an employee of a hospital whose employment includes the provision of medical services." Assisted living homes and home care providers employ workers performing substantially the same hands-on medical and personal care functions, often for the same patient populations. However, because assisted living and home care settings are excluded from this exemption, we are unable to offer 12-hour shifts that are routine and widely preferred in hospital settings.

This distinction has a direct and negative impact on workforce retention:

- **Employee preference:** Many direct care workers strongly prefer 12-hour shifts and a three-day workweek, which allows for better work-life balance and reduces burnout.
- **Recruitment competition:** Assisted living homes and home care agencies compete directly with hospitals for the same workforce. When we cannot offer comparable scheduling options, we are placed at a disadvantage unrelated to quality of care or compensation.
- **Operational stability:** Without access to 12-hour shifts, scheduling becomes unnecessarily complex, requiring more handoffs, mixed shift lengths, and increased administrative burden—all of which contribute to staff dissatisfaction and turnover.
- **Department of Labor limitations:** I recently sought approval for a Flexible Work Hour Plan and was denied by the Department of Labor solely on the basis of the current statutory language, confirming that relief requires legislative action rather than regulatory discretion.

Amending AS 23.10.060(d)(12) to include assisted living homes (and potentially licensed home care agencies) whose employees provide medical services would align scheduling flexibility with the realities of today's care workforce. It would complement HB 96's goals by improving retention without increasing Medicaid costs, while also enhancing continuity of care for patients.

I would welcome the opportunity to discuss this further or provide written testimony if helpful. Thank you again for your leadership on this important issue and for inviting stakeholder input as HB 96 moves forward.

Sincerely,

Jack Pomerantz, MD  
Owner & Medical Director  
McKinley Care LLC  
Anchorage, Alaska