March 17, 2026

Sen. John Hoffman, Chair
Senate Human Services Committee
Minnesota Senate Building
St. Paul, MN 55155

RE: Small Provider Concerns with S.F. 4279 (Hoffman)

Dear Chair Hoffman and members of the Senate Human Services Committee,

The Residential Providers Association of Minnesota ("RPAMN") is a non-profit trade association that represents small, residential customized living and waivers service providers in Minnesota. The vast majority of RPAMN members are small culturally-specific service providers who might not otherwise be engaged in the policy development and legislative processes. We are writing to thank Rep. Nadeau for the collaboration and engagement throughout the interim and to provide the committee RPAMN's feedback on S.F. 4279 (Hoffman) as introduced.

In general, RPAMN understands and empathizes with communities, particularly those in the northwestern suburbs, which have become home to a disproportionate number of small assisted living facilities and community residential setting (CRS) group homes. However, RPAMN believes it is important that any legislative solutions consider the root causes behind setting concentration and looks to expand opportunities rather than simply close doors for folks seeking to live in settings of their choosing. We appreciate the work Sen. Hoffman has done, but would like to offer the following feedback on the proposals contained in S.F. 4279:

- **Proximity of Settings (Sec. 1 & 6):** RPAMN believes strongly in the rights of individuals with disabilities seeking a provider-controlled setting to reside in the settings and communities of their choice. RPAMN also knows that the cost of housing, particularly as many providers struggle to enroll as vendors of housing support, is a major barrier to operating a setting in many Twin Cities communities. Further, transit accessibility also has a major impact on workforce recruitment. Therefore, while RPAMN does not believe it is in anyone's best interest for communities to have a high-density of settings in close proximity, RPAMN does not believe the Legislature should limit options without simultaneously expanding them elsewhere. As such, RPAMN has concerns with these sections as currently drafted.
- **Municipal Notice (Sec. 2 & 4):** RPAMN has no objection to the idea that the licensing agency be required to provide notice to the host municipality of the issuance of a new license. That is currently publicly available information. However, RPAMN does believe that the notice should be provide after the issuance of the license and not in advance (as the bill currently contemplates). This avoids a situation outside parties attempt to intervene or influence the licensing process in order to exclude an otherwise appropriate provider.
- **Delegated Inspection Authority (Sec. 3 & 5):** In general, RPAMN has concerns with a proposal that would allow municipal licensors to be involved in the licensing visits that would otherwise be conducted by the historic licensors. We have experienced situations where cities have launched aggressive rental license investigations in response to provide-led public policy initiatives. RPAMN would be more comfortable if the permissive language in the bill did not apply to the issuance of an initial license as it assures MDH/DHS oversight and an administrative appeal right should city inspectors feel local pressure to take a particularly punitive approach to inspections.

- **Vulnerable Adult Abuse & Neglect Changes (Sec. 7):** RPAMN supports efforts to streamline and improve the vulnerable adult investigation process and enhance communication and transparency between the parties involved. In reviewing the language in the proposal, RPAMN's primary note of caution would be to ensure that the new requirements created in Section 7 do not conflict with the Minnesota Government Data Practices Act and data privacy protections for individuals who may be parties to or the subject of an investigation. We respectfully request that legislators review that issue if this proposal is going to advance.

We look forward to working with you and the committee as the bill advances through the legislative process and greatly appreciate work with RPAMN leadership this session.

Thank you for the work you do and for your support of Minnesotans with disabilities.

Sincerely,

Rebecca Johnston, Executive Director
Residential Providers Association of Minnesota

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