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June 15, 2026

The Honorable Josh Becker
Chair, Senate Human Services Committee
1020 N Street, Room 521
Sacramento, CA 95814

RE: AB 2278 (Ávila Farías), Unsustainable IHSS Cost Escalation and Impacts on Counties – OPPOSE

Dear Senator Becker,

I am writing on behalf of the Kern County Board of Supervisors to express our strong opposition to AB 2278 (Ávila Farías). While we deeply value the IHSS program and the essential support it provides to older adults and individuals with disabilities, this bill would place counties under substantial new fiscal and administrative strain without the revenue, safeguards, or structural balance needed to keep the program sustainable.

AB 2278 creates several new mechanisms that would trigger upward MOE adjustments, including wage and benefit increases, contract-driven rate changes, wage supplements, and annualized mid-year adjustments. Counties are already grappling with significant state-driven IHSS cost pressures, such as the proposed trailer bill language that would allow the state to withhold critical realignment revenues during IHSS bargaining impasses.

The bill compounds these challenges by requiring counties to shoulder 100% of the cost when enhanced federal matching funds are lost in certain circumstances, including those tied to reassessment timeliness, an area influenced by factors beyond full county control. This shifts substantial financial risk to counties without corresponding state partnership or support.

Additionally, AB 2278 preserves the permanent 4% annual MOE inflator, compounding year after year even in the absence of local action. Without additional revenue or flexibility, this automatic escalation will continue to crowd out funding for core county responsibilities, including public safety, health, and essential government services.

Expanding wage supplements and broadening MOE adjustments tied to contract rates creates long-term local obligations at a time when counties across the state (through CSAC, CAPA, and other organizations) have consistently raised alarms about the widening gap between IHSS program costs

and available realignment revenues. Counties have repeatedly cautioned against measures that shift IHSS costs to the local level without commensurate state investment or protections.

In short, AB 2278 introduces new fiscal obligations and risks while offering no corresponding revenue backfill, stability provisions, or structural changes that would allow counties to administer IHSS responsibly and sustainably.

For these reasons, the Kern County Board of Supervisors opposes this measure, and we respectfully urge your committee to vote **NO on AB 2278**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phillip Peters", with a stylized flourish at the end.

Phillip Peters, Chairman
Kern County Board of Supervisors

cc: Honorable Members, Senate Human Services Committee
Honorable Members, Kern Legislative Delegation
California State Association of Counties (CSAC)
California Association of Public Authorities for In-Home Supportive Services (CAPA)
Kern County Aging and Adult Services
Shaw Yoder Antwih Schmelzer & Lange