



OREGON  
**HEALTH**  
AUTHORITY

**Public Health Division**

Health Facility Licensing and Certification Program

**2025**

# **OHA Nurse Staffing Advisory Board**

## **Legislative Report**



# Contents

<b>Acknowledgments</b> .....	<b>3</b>
<b>Executive summary</b> .....	<b>4</b>
<b>Key achievements</b> .....	<b>6</b>
<b>Impact of HB 2697</b> .....	<b>7</b>
<b>Passage of HB 3294</b> .....	<b>8</b>
<b>Complaint investigations</b> .....	<b>9</b>
Complaint and investigation trends .....	10
Investigation tools.....	11
<b>Hospital staffing resources</b> .....	<b>13</b>
<b>Plan for the coming year</b> .....	<b>14</b>
<b>Conclusion</b> .....	<b>15</b>

# Acknowledgments

The Oregon Health Authority prepared this publication in collaboration with members of the Public Health Division Health Care Regulation and Quality Improvement Section, and the Oregon Nurse Staffing Advisory Board.

For more information contact:

Kimberly Voelker, MPH  
Hospital Staffing Policy Analyst  
Health Facility Licensing & Certification  
Public Health Division  
Oregon Health Authority  
[Mailbox.nursestaffing@odhsoha.oregon.gov](mailto:Mailbox.nursestaffing@odhsoha.oregon.gov)



*Please cite this publication as follows:*

Oregon Public Health Division. Nurse Staffing Advisory Board: 2025  
Legislative Report.

Portland, OR. March, 2026.

# Executive summary

Oregon's hospital staffing law requires hospitals and direct staff to work together to promote safe patient care. These laws have been part of Oregon's commitment to improving health care since 2001. In 2015, changes in the law created a Nurse Staffing Advisory Board (NSAB) supported by the Oregon Health Authority (OHA).



This report discusses:

- The NSAB's key achievements in the last year
- Impact of 2023's House Bill (HB) 2697 on the board's work
- Expected changes following passage of 2025's HB 3294
- Board focus on OHA's:
  - Complaint investigations, including investigation trends
  - Investigation tools
  - Hospital staffing resources
- Plan for the coming year

In 2023, the Legislature passed HB 2697, which expanded hospital staffing requirements, created registered nurse (RN) ratios to be adopted in hospital nurse staffing plans for certain units, set maximum assignment limits for certified nursing assistants (CNAs), modified nurse staffing plan requirements, and set mandatory civil monetary penalties for noncompliance beginning in June 2025. The bill also created a complaint-driven enforcement process and eliminated routine nurse staffing surveys.

HB 2697 bill created staffing plan and committee requirements for professional, technical, and service staffing, and gave the Oregon Bureau of Labor & Industries (BOLI) additional authority for enforcement of break requirements for hospital staff members. Although the NSAB does not provide oversight of this work, it is aware of these additional changes to hospital staffing and how the changes impact OHA.

In 2025, the Legislature passed HB 3294, which made changes to enforcement of statutory nurse staffing ratios, complaint prioritization, and permitted complaint consolidation for complaints with identical allegations.

The board continues to provide valuable input to OHA regarding hospital nurse staffing. Between November 2024 and April 2025, the board provided recommendations on implementation goals related to intake and triage, investigation, and enforcement of complaints. Additionally, the board has provided guidance on the new hospital staffing investigation tools and on opportunities to further streamline the investigation process.

NSAB reviews complaint trends at its quarterly meetings and advises OHA on resources that can help direct care and hospital partners across Oregon better understand the law. NSAB has recommended education topics for OHA's new short video series, as well as supported OHA's continued outreach through hospital staffing webinars.

Finally, to ensure the success of Oregon's nurse staffing laws, NSAB encourages the Governor to continue to make timely appointments and reappointments to the board.

The full legislative report is available at [www.healthoregon.org/nursestaffing](http://www.healthoregon.org/nursestaffing).

# Key achievements

NSAB continues to advise OHA on opportunities to enhance patient safety, assure quality care, support nurses, and ensure that OHA's activities are both efficient and effective. NSAB members' have advised OHA on outreach processes, such as the Hospital Staffing Webinars and Hospital Staffing Short Videos, to improve understanding of the hospital staffing law. The NSAB has also advised on implementation goals and processes, including the new investigation tools.



NSAB recognizes that there is still much to learn about implementation of the new staffing law. The board has shared thoughtful recommendations to OHA on emerging issues in hospital staffing. The board looks forward to providing additional guidance on opportunities for education and outreach to hospitals, hospital staff, and other interested parties across the state on nurse staffing issues as OHA works within the larger context of hospital staffing regulation.

# Impact of HB 2697

In June 2023, the Legislature passed HB 2697, which made significant changes to Oregon's hospital staffing law. The law includes nurse staffing and other hospital staffing changes.

The hospital staffing law went into effect on September 1, 2023, although certain provisions began operating in 2024 and 2025, as seen in the image below:

<b>Sep. 1, 2023</b>	<ul style="list-style-type: none"><li>• Triennial surveys and Plans of Correction end</li><li>• OHA launched a new hospital staffing complaint form and began investigating nurse staffing complaints under the new law</li></ul>
<b>Jan. 1, 2024</b>	<ul style="list-style-type: none"><li>• OHA adopted temporary rules related to processing complaints</li></ul>
<b>May 15, 2024</b>	<ul style="list-style-type: none"><li>• OHA adopted permanent rules that aligned with limited rulemaking requirements for hospital staffing in HB 2697. The board and other external partners, like the Oregon Nurses Association and Hospital Association of Oregon, participated in the Rules Advisory Committee</li></ul>
<b>Jun. 1, 2024</b>	<ul style="list-style-type: none"><li>• Deadline for hospitals to adopt and implement Nurse Staffing Plans (NSPs) that meet new statutory requirements</li></ul>
<b>Dec. 31, 2024</b>	<ul style="list-style-type: none"><li>• Professional/Technical and Service Staffing Committees must be established and staffing plans must be created</li></ul>
<b>Jun. 1, 2025</b>	<ul style="list-style-type: none"><li>• Hospitals may be subject to civil penalties for violations in ORS 441.792 that occur on or after June 1, 2025</li></ul>

The board receives regular updates from OHA on upcoming changes resulting from delayed implementation of the bill. NSAB will receive updates on the implementation of civil monetary penalties, which went into effect on June 1, 2025, at its October quarterly meeting. The board will continue making recommendations on the implementation of the law and providing suggestions on resources to improve understanding of law requirements.

# Passage of HB 3294

In June 2025, the Legislature passed HB 3294, which includes the following changes to the hospital staffing law:

- Makes it a violation for a hospital that has not adopted a nurse staffing plan to not follow the statutory ratios in ORS 441.765;
- Directs OHA to prioritize complaints that allege noncompliance on or after June 1, 2025; and
- Allows OHA to consolidate complaints with duplicate allegations.

The board will receive more information about implementation of the new bill during the October quarterly meeting.



# Complaint investigations

HB 2697 made hospital staffing enforcement activities complaint-driven and eliminated routine, triennial nurse staffing surveys. Under HB 2697, OHA can only investigate complaints that are submitted within 60 days of the alleged incident and, if true, would represent a violation listed in ORS 441.792 (“valid complaints”).

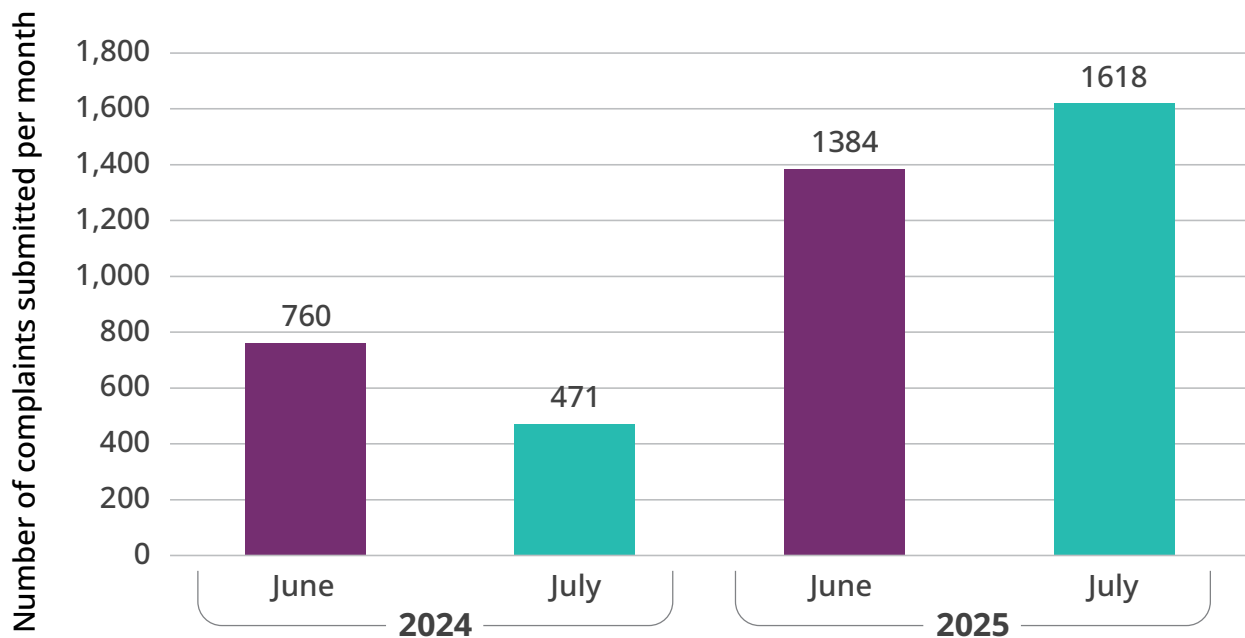


The board routinely discusses trends in hospital staffing complaint submissions and investigations, including sudden increases in complaint submissions. In June 2024, there was a large increase in the number of complaints filed, which led to a backlog in complaint processing, complaint validity checks, investigations, and enforcement activity.

Throughout 2024 and 2025, the NSAB received updates from OHA on its goals to process the hospital staffing backlog following the surge in complaints on and after June 1, 2024. OHA and the NSAB collaborated on setting goals which included: eliminating the triage backlog, maintaining timely BOLI notifications, reducing complaint follow-up, and issuing outstanding enforcement notices for pre-June 1, 2025 complaints. At the April 2025 quarterly meeting, OHA informed the NSAB that most goals had been met.

On June 1, 2025, hospitals became subject to civil monetary penalties for hospital staffing violations that occurred on or after June 1, 2025. OHA received an even larger surge in hospital staffing complaints. The submissions in June 2025 were almost double what was submitted in June 2024. The submissions increased again in July 2025.

## Number of submitted hospital staffing complaints: 2024 versus 2025



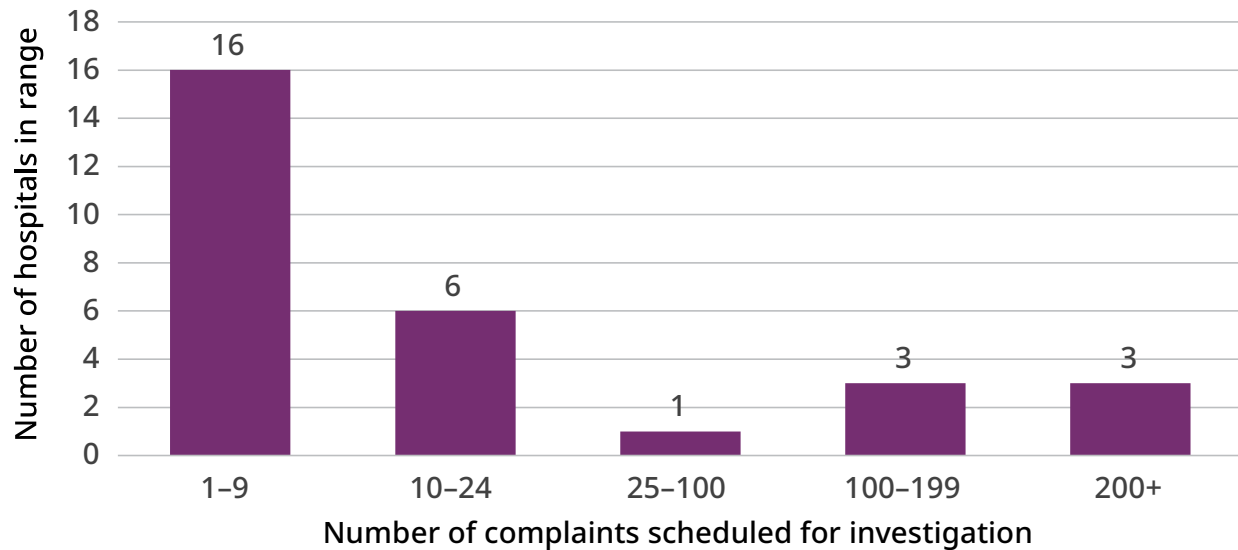
The NSAB received updates from OHA in the recent surge of hospital staffing complaints at the July 2025 quarterly meeting and decided it would discuss new implementation goals for the most recent surge in October 2025.

## Complaint and investigation trends

During the July 2025 quarterly meeting, the board received updates on investigation trends, which included the following:

- Of Oregon's 67 facilities subject to the hospital staffing law, only 29 (43%) have received a complaint against them.
- In general, most hospitals (n = 22) with hospital staffing complaints have no more than 24 complaints under investigation.
- There are three hospitals with more than 200 complaints with investigations starting between June 5 and August 17, 2025. The majority of complaints under investigation are related to just three hospitals.

## Number of Oregon hospitals with complaints scheduled for investigation: June 5 – August 17, 2025



*Key: The table above reflects the number of hospitals with investigations starting between June 5 and August 17, 2025. For example, Table 1 shows that there are three hospitals with more than 200 complaints starting investigation between June 5 and August 17, 2025.*

## Investigation tools

In June 2025, OHA introduced several investigation tools to ensure efficiency and streamline the investigation process. These tools were designed to quickly gather the information OHA needs when investigating certain types of complaints, thereby reducing the need to clarify staffing records and conduct additional interviews. Additionally, by having the tools completed by both hospital staff and hospital managers, the investigations tools increase transparency into the investigation process, which is a concern that has been raised by external partners to the NSAB and OHA.

The new investigation tools include the:

- Nurse Staffing Plan Approval Tool, to be completed by the Nurse Staffing Committee Direct Care Co-Chair and Nurse Manager Co-Chair;
- Professional/Technical Staffing Plan Approval Tool, to be completed by the Professional/Technical Staff Co-Chair and Manager Co-Chair;

- Service Staffing Plan Approval Tool, to be completed by the Service Staffing Committee Staff Co-Chair and Manager Co-Chair;
- RN Staffing During Shifts Tool, to be completed by a direct care nursing staff member and nurse manager;
- CNA Staffing During Shifts Tool, to be completed by a direct care nursing staff member and nurse manager; and
- Mandatory Overtime Tool, to be completed by the Chief Nursing Officer.

The board received a presentation on the new tools at the July 2025 quarterly meeting. At the time of the meeting, OHA informed the board that investigations where the tools were used were completed faster than investigations where tools were not used. At this time, the difference in completion time on average has increased to at least 28 days.

At the meeting, the board shared concerns about the additional administrative burden experienced by hospitals when completing the tools and suggested various ideas to improve the tools without reducing their positive impact, such as formatting changes that could allow the tool to be more easily completed and requiring less detail in the tools. OHA has since created new versions of the tools with different formatting to increase useability, and is looking at opportunities to reduce the level of detail requested in the tools.

# Hospital staffing resources

As the board and OHA collaborate to implement the hospital staffing laws, hospitals and hospital staff members have questions about these laws, the complaint investigation process, and enforcement of violations. The NSAB has provided crucial feedback to OHA concerning resources to help improve public understanding of the hospital staffing law.



- The board has provided feedback on the OHA Hospital Staffing Video Shorts, which explain complex hospital staffing topics in focused 3–11 minute videos. The board felt the short content videos covering key hospital staffing topics were an effective way to help hospitals and hospital staff members learn about the law, comply with the law, file complaints, and cooperate with investigations.
- The board believes OHA’s webinars are a valuable opportunity for hospital staff and hospitals to ask questions about the law. OHA has continued to hold webinars, which covered new topics, such as “Civil Monetary Penalties”, “Professional/Technical and Service Staffing”, and “Special Topics”. The webinars address common issues and misconceptions OHA identified about the law and include long, interactive Q&A sessions.
- The board understands the public’s interest in OHA’s work and recommended in 2024 that OHA create a dashboard to show the status of hospital staffing complaints and investigations. OHA implemented the dashboard in 2024 and changed the format in 2025 as new parts of the law went into effect. The online dashboard is updated weekly. The board remains interested in the dashboard and receives updates on OHA’s progress at each quarterly meeting.

# Plan for the coming year

- NSAB will continue making recommendations to OHA on the implementation of HB 2697 and HB 3294, with additional emphasis on enforcement of violations and the implementation of civil monetary penalties for violations after the June 1, 2025 effective date. The NSAB will also be made aware of any future changes to the law and provide advice on the anticipated impact of legislative changes.
- The board plans to hold a facilitated work session in 2026 to discuss the board's goals and priorities for implementation of the hospital staffing law.
- The board will continue to accept public comments at each quarterly NSAB meeting. The board receives public comments at the start of the meeting to encourage participation.
- The board will continue to collaborate with their networks of nurse staffing members and hospitals in Oregon to identify where support is needed.
- The board will continue to encourage interested parties across the state to apply for NSAB positions and ask the Governor to appoint members in a timely manner.
- NSAB and OHA will continue to work closely together to build a shared understanding of patient care issues related to nurse staffing.



# Conclusion

NSAB members continue to collaborate with nurses and hospitals and advise OHA on promoting safe patient care. NSAB members use their commitment to safe patient care as their guide. Members recognize that nurse staffing affects safe nursing care and the quality of patient outcomes.

NSAB members look forward to continuing to advise OHA on implementation of the hospital staffing law and will continue to identify opportunities to promote understanding of the law.



You can get this document in other languages, large print, braille or a format you prefer free of charge. Contact The Health Facility Licensing and Certification Program at 971-673-0540 or email [mailbox.nursestaffing@odhsoha.oregon.gov](mailto:mailbox.nursestaffing@odhsoha.oregon.gov). We accept all relay calls.

**Oregon Health Authority**  
**Public Health Division**  
Health Facility Licensing and Certification Program  
Phone: 971-673-0540



200-390989a\_25 (03/2026)