

To: OHA, Public Health Division  
Administrative Rules Coordinator  
800 NE Oregon Street, Suite 930  
Portland, Oregon 97232

And via email to: [publichealth.rules@dhsoha.state.or.us](mailto:publichealth.rules@dhsoha.state.or.us)

January 12, 2022

Redmond School Board Opposes Adoption of the following:

OAR 333-019-1025- Requiring Masks to be Worn in Indoor Spaces in Oregon

OAR 333-019-1015- Requiring the Universal Use of Masks Inside Schools and

OAR 333-019-1030- COVID 19 Vaccination Requirements for Teachers and School Staff

To Each Board and Committee Member:

The Board of Directors for the Redmond School District urges each Board and Committee Member in the strongest possible terms to stand firm against and halt the efforts of the Oregon Health Authority (OHA) in adopting mandates set forth in OAR 333-019-1025, OAR 333-019-1015, OAR 333-019-1030 and return control over pandemic-related safety measures to local government bodies, including local school boards.

The OHA, according to their website, "values transparency, accountability, and the wise use of public resources." In addition, OHA's non-discrimination policy specifically states, "OHA will make reasonable changes to policies, practices and procedures by talking with you about your needs." Oregon School Board members along with the people of Oregon do not feel heard nor is the OHA being held accountable to impose the will of local elected officials. On August 25, 2021, the Redmond School Board passed resolution 21:163 Demanding Local Control Over Pandemic Related Decisions. In addition, restoring local control was a prominent topic expressed by Oregon School Board Members during the 2021 Fall Listening Sessions conducted by the Oregon School Board Association. A link to the memo and subsequent data is below:

<http://www.osba.org/-/media/Files/Resources/Legislative/2021/2021-Fall-Listening-Session-Memo---Final.pdf?la=en>

Following through with the proposed rule changes completely ignores the will expressed by the Redmond School Board and retains decision making authority at the State level. This is the exact opposite of local control over pandemic related safety measures that the Redmond School Board expressed in its resolution 21:163 and in the OSBA Fall Listening Session. We implore you to take these things into consideration and make reasonable changes to policies, practices and procedures and listen to the needs of the Redmond School Board by stopping the OHA's proposed rule changes effectively returning control over pandemic related decision making to the local level.

In addition, according to OHA's own non-discrimination policy "OHA must follow state and federal civil rights laws. It cannot treat people unfairly in any of its programs or activities..." As a Board we also have grave concerns that adopting these rule changes would effectively create de facto discrimination. To mandate masks as a prerequisite to attend school in Oregon openly discriminates against students and families who exercise their right to decline masks (by OHA definition a mask is a "medical grade mask") and maintain control over what goes onto and into their and their children's bodies. Governor Brown and the OHA preach about equity and disparate outcomes for minorities and the underserved, yet continually ignore the desires of those who exercise their right to refuse medical devices and vaccinations. BIPOC, rural, and poor are also individuals who may want to maintain control over what goes onto and into their and their children's bodies as a private matter. This kind of hypocrisy cannot stand.

Furthermore, the Redmond School District is not immune to the fiscal and economic impacts of the proposed rules detailed in the rules statement of need and fiscal impact. We encourage you to read the statements of need and fiscal impact in detail and consider the following information in making your decisions. The Redmond School District would be expected to incur the costs of providing masks for students, teachers, and staff and direct staff resources to respond to complaints, address non-compliance issues, and complete OHA documentation and reporting requirements related to the proposed rule changes. The Redmond School District has also experienced the unenrollment of 400 students and has experienced staffing challenges including lack of substitute teachers, custodial staff, food service employees, instructional assistants, and lack of transportation staff that caused, temporarily, two bus routes to be cancelled. As acknowledged in the statement of need and fiscal impact, "There is also the potential for a further reduction in enrollment and staffing because of these proposed rule changes."

The Redmond School Board is very concerned about the potential these proposed rule changes have to exacerbate the challenges currently facing the students, families, and staff in the Redmond School District. Thus, the Board of Directors for the Redmond School District urges each Board and Committee Member in the strongest possible terms to stand firm against and halt the efforts of the Oregon Health Authority (OHA) in adopting mandates set forth in OAR 333-019-1025, OAR 333-019-1015, OAR 333-019-1030 and return control over pandemic-related safety measures to local government bodies, including local school boards.

Sincerely,

Shawn Hartfield, Board Chair  
Redmond School District Board of Directors  
Redmond, Deschutes County, Oregon

Michael Summers, Vice Chair  
Redmond School District Board of Director  
Redmond, Deschutes County, Oregon

Jill Cummings, Director  
Redmond School District Board of Directors  
Redmond, Deschutes County, Oregon

Keri Lopez, Director  
Redmond School District Board of Director  
Redmond, Deschutes County, Oregon