



BOARD OF COUNTY COMMISSIONERS

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December 16, 2021

Oregon Health Authority
500 Summer Street, NE, E-20
Salem, OR 97301-1097

Re: Proposed Rule Change OAR 333-019-0010 and OAR 33-019-1005

COVID -19 vaccines are causing myocarditis and other health problems in children, yet we are witnessing an aggressive campaign to not only push these experimental products, but to change the rules to effectively mandate these vaccines for children to go to school. This, despite the overwhelming evidence that children are at no more risk for COVID-19 than they are from the seasonal flu.

In fact, the risk-benefit ration makes it a non-starter for mandating children be vaccinated for COVID-19.

The Yamhill County Board of Commissioners, as the Local Public Health Authority Governing Body, stands adamantly against the continued intimidating policies of the unelected members of the Oregon Health Authority, most recently and specifically outlined in the OAR 333-019-0010 and OAR 33-019-1005 proposed rule changes.

OAR 333-019-0010 and OAR 33-019-1005 effectively grant unelected members of the Oregon Health Authority the authority to "determine" if a vaccine, such as the 5-11-year-old COVID-19 immunization, should be added to the list of vaccine requirements, and it allows OHA to set an arbitrary "School Exclusion" date pressuring all students to meet or be excluded from in-person attendance at school.

The OAR 333-019-0010 and OAR 33-019-1005 proposed rule changes do not require that OHA offer non-medical and medical Exemptions for COVID-19 vaccines, in direct violation of Oregon law.

Many constituents have repeatedly reached out to this Board expressing frustration and concern regarding OHA's lack of the "transparency and accountability" the agency espouses.

The proposed rule changes constitute an end run around the legislative process and one that imposes extreme changes to current law with very little transparency.

B.O. 21-497

Currently, OHA cannot lawfully require the COVID-19 vaccine for school attendance because the existing list of immunizations must be approved by the legislature.

Additionally, despite repeated attempts to remove exemptions, Oregon law allows for medical and non-medical exemptions for children for all other immunizations and the proposed rule changes would be in direct violation of that law.

OAR 333-019-0010 and OAR 33-019-1005 are also concerning because they include definition changes for immunity to exclude "natural" by only accepting vaccine-induced immunity. By redefining the definition for immunity to be vaccine-induced-only the State can require every school aged child to show proof of "vaccine immunity", which creates a de facto mandate as the COVID vaccine is not on the "required," list but showing proof of immunity is, adding the requirement of "verification of vaccination".

These proposed rule changes are attempting to do what SB 442 (2015), HB 3063 (2019), and SB 254 (2021) have ALL failed to do in Oregon, which, in essence, is to mandate an immunization as a prerequisite to attend school in Oregon and openly discriminate against students and families who exercise their right to decline a medical procedure.

We strongly oppose these proposed rule changes.

Sincerely,



Mary Starrett
Chair



Lindsay Berschauer
Vice-Chair

Voted "No"

Casey Kulla
Commissioner

Accepted by Yamhill County
Board of Commissioners on
12/16/21 by Board Order
21-497