

Petition to Repeal a Rule
Director Pat Allen of the Oregon Health Authority

In the Matter of the Repeal of OAR 333-019-1030 COVID-19 Vaccination Requirements for Teachers and School Staff

Petition to Repeal OAR 333-019-1030
(Vaccination Requirements)

1. Petitioner's name and address is MacKensey Pulliam, 18751 Pacific Ave, Sandy, Oregon.
2. Petitioner is the President and Founder of Oregon Moms Union.
3. Under OAR 333-019-1030, schools are required to have teachers, school staff and volunteers fully vaccinated or have provided documentation of a medical or religious exception with approval. This rule has impacted staffing and volunteer support within schools, despite what reports are or aren't sharing. The fact that shortages of the magnitude we are seeing did not exist prior to the vaccine requirement, and now are a significant issue. There has also been an obvious decrease in parent and community volunteers as a result of schools not allowing volunteers, or requiring vaccinations in order to do so without offering exemptions.
4. OAR 333-019-1030 now contradicts CDC guidance which no longer differentiates between vaccinated and unvaccinated individuals when it comes to testing and isolation, therefore vaccinations should not be a requirement for teachers, staff and volunteers.
5. In addition, the vaccination being required does not prevent the disease nor transmission of the disease. While it may help with severity of symptoms of COVID-19, it should not be a requirement of employment or volunteer status. Since this rule was implemented, research has revealed that the efficacy of the vaccine has continued to decline, outbreaks amongst vaccinated have continued to increase even with boosters. Severity of current variants has also declined. This rule also doesn't take into consideration natural immunity after having COVID-19.
6. Petitioner proposes that OAR 333-019-1030 be repealed so that teachers, school staff and volunteers are not required to be fully vaccinated or have documentation of a medical or religious exemption in order to teach, work, learn, study, assist, observe, or volunteer at a school. The rule is not necessary, no longer aligns with the CDC, and has exasperated staffing shortages in schools across the state.
7. OAR 333-019-1030 as petitioner proposes to repeal the entire OAR 333-019-1030 effective immediately.

8. Petitioner has knowledge of persons who may have a particular interest in the proposed repeal of OAR 333-019-1030. This petition is not to be denied without Oregon Health Authority inviting public comment upon the rule based on OAR 137-001-0070.

9. The rule does not overlap, duplicate or conflict with any state, federal or local regulation that petitioner has identified.

10. It appears that there is a continued need for public safety. However, there are other mitigation strategies that can be put in place including increasing education around preventing underlying conditions that are the key contributor to the severity of disease. However, the justification for keeping this rule in place when it does not prevent disease or transmission is not considering the scientific evidence since the rule was implemented. Repealing the rule does not prevent schools from enforcing rules but it does allow them to remove barriers contributing to short staffing.

Wherefore, petitioner requests Director Pat Allen to repeal OAR 333-019-1030.

Dated September 12, 2022

A handwritten signature in black ink, appearing to read 'Mackensey Pulliam', written in a cursive style.

Mackensey Pulliam
Petitioner