August 19, 2020

To: Heather Owens, Proposed Rulemaking Coordinator

Fr: Oregon Coalition of Local Health Officials

Re: Permanent Rulemaking for OAR 333 – 17, 18 and 19

The Oregon Coalition of Local Health Officials would like to formally submit the following comments to the proposed permanent rulemaking for OAR 333 – 17, 18 and 19.

The temporary rules created to include SARS-CoV-2 in the reportable disease administrative rules have been proposed to remain permanent. These rules are important to require hospitals, and health clinics to report COVID-19 in a timely fashion to local public health authorities.

Feedback:

1. **Review administrative rules with LPHA Health Officers and Local Public Health Administrators** - According to the Notice of Proposed Rulemaking there wasn’t a Rules Advisory Committee nor was there any specific outreach to Local Public Health Authorities through CLHO. While the quick rise of the pandemic gave need for the temporary rules to be put in place without consultation, the long-running nature of this response allowed for time to consult with Health Officers or Public Health Administrators. Neither group was listed in a group of eleven other organizations that were “notified/ consulted about these rulemaking changes.”
2. **Narrow and align the provisions in 333-019-0010** – The provisions in this section, consistent with the OAR, just add COVID in with other reportable disease in school, childcare and health care settings. The CLHO would like to suggest that health officers / public health administrators only allow exceptions to isolation and/or return to work in certain circumstances (as currently outlined in the Investigative Guidelines).