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January 24, 2022

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

RE: [OAR 333-019-1010](#)

Attn: Public Health Division Rules Coordinator

On behalf of [LeadingAge Oregon](#), I am submitting comments on [OAR 333-019-1010](#) COVID-19 Vaccination Requirement for Healthcare Providers and Healthcare Staff in Healthcare Settings. Our members included nursing, assisted living and residential care facilities that have been hard hit by the pandemic and are currently experiencing another crisis – a workforce shortage of a magnitude not seen before. Many have stopped admitting new residents, closed portions of their facility and some are being forced to close as a result.

The temporary rule does not allow newly hired employees who have not yet received their full vaccination status to work in a health care facility until they are fully vaccinated. Yet, the rules allow unvaccinated staff who have obtained a religious or medical exemption to work in the facility.

We respectfully ask that new hires that have started the process to become fully vaccinated be allowed to work in a facility under a “new hire exemption” to follow the same required infection prevention and protection protocols as other staff with an allowed religious and medical exemption.

We believe our request is warranted given the allowance for religious and medical exemptions and the workforce crisis. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Ruth Gulyas".

Ruth Gulyas
Chief Executive Officer