



# ODE Rules Advisory Committee

March 2, 2023

# Welcome and Group Share

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→ In the chat, please list your:

- ◆ Name;

- ◆ Pronouns;

- ◆ Organization; and

- ◆ *What is something that makes you feel safe?*

# Agenda

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9:00 am - 11:00 am

- I. Introductions & Opening Remarks
- II. Rules-at-a-Glance
  - A. Awarding and Using Competitive Oregon Farm-to-School Program Education Grants
  - B. Special Education Evaluation and Eligibility OARs
- III. Draft Rules
  - A. Appeals Process Rule Revisions
  - B. Health Services
  - C. Menstrual Dignity for Students
  - D. Variance Requests for Pupil Transportation Vehicles
- IV. Open Space/Questions
- V. Closing

# RAC Core Principles

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- Rulemaking driven by engagement and consultation
- Intentionally collaborating with diverse perspectives
- Coordinating engagement opportunities and looping back with partners
- Providing multiple avenues for feedback and response in meetings
- Clearly defining roles and responsibilities within the rulemaking process

# RAC Working Agreements

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- Assume best intent, attend to impact, and earn trust
- Engage tension and commit to dialogue
- Speak your truth and represent your perspectives
- Respect different communication styles and embrace underrepresented voices
- Practice confidentiality when sharing outside the RAC

# Engagement Opportunities for Administrative Rules

## Oregon Department of Education

Ensures rules comply with state law.

## Staff technical advisory committee

Ensures rules align with program/grant purpose. Discuss how rules will impact affected communities.

## State Board of Education

Ensures rules align and advance ODE Education Equity Stance. Provides staff with direction on administrative rules. Adopts administrative rules and sets educational policy and standards for all public school districts.

## ODE Rules Advisory Committee

Ensures rules comprehensively address impact on affected communities. Address fiscal, small business & racial equity impacts.

## The General Public

Submits oral or written public testimony and/or comments at scheduled OAR Hearings and State Board meetings.



# Process and Rhythm

RAC is Advisory to ODE Staff who make final recommendations to SBE for final decision.



## Notification

Agenda will be sent out by RAC Coordinator

## RAC Meetings

Discuss Draft Rule or Early Rule Concepts

## State Board of Education

Staff will take Oregon Administrative Rules to State Board of Education

## RAC Meetings

Staff may bring back draft rules to RAC

## State Board of Education

Final adoption of rules or policies



# ODE Rules-at-a-Glance



# OAR 581-017-0444 - Awarding and Using Competitive Oregon Farm-to-School Program Education Grants

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**Subject:** Farm to School Education Grant fund administration and usage

**Concept:** Pertaining to the details associated with distribution and management of farm to school education grant funds. Includes allowed funding ranges per grant, timelines, and reallocation.

**Background:** The purpose of the competitive Oregon Farm-to-School education grant is to assist entities in paying the costs they incur providing food-based, agriculture-based, or garden-based educational activities for the benefit of children enrolled in a public school or public charter school within a school district, or a center-based program for children.

OAR technical fix was requested by stakeholders and partner organizations

# OAR 581-017-0444 - Awarding and Using Competitive Oregon Farm-to-School Program Education Grants

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**Proposed Rule Changes:** Remove the following language from rule:

“The department will award competitive Oregon Farm-to-School Program education grants for the biennium beginning on July 1, of the first year of the biennium, and ending on June 30, on the second year of the biennium. If funding is available, additional competitive grants will be awarded in subsequent biennia.”

**Proposed Rule Impacts:**

- Technical fix to allow carryover of individual grant funds into the next biennia, if required.

**Next Steps:**

- Second read and adoption at April State Board of Education Meeting

# Special Education Evaluation & Eligibility OARs

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**Subject:** Special Education Evaluation & Eligibility OAR Revision pursuant to Senate Bills 13 (2019) & 16 (2019)

**Concept:** These rule amendments would update 13 OARs related to evaluation & eligibility for special education.

**Background:** The OARs being updated define the evaluation and eligibility process for each of Oregon's 12 special education eligibility categories as delineated by the Individuals with Disabilities Education Act (IDEA) (2004). Updates are also proposed to the definitions for the division (OAR 581-015-2000 Definitions).

# Special Education Evaluation & Eligibility OARs

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**Proposed Rule Changes:** ODE is recommending revisions in three domains:

- **Domain 1 (Required):** Updates to eligibility category names
- **Domain 2 :** Medical examinations
  - **Domain 2A (Required):** Updates the list of professionals who can complete medical, health, audiological, and vision assessments
  - **Domain 2B (At the Board's Discretion):** Reduces the number of eligibility categories that require a medical, health, audiological, and vision assessments
  - **Domain 3 (At the Board's Discretion):** Eligibility requirements for EI/ECSE and school age populations

**Proposed Rule Impacts:**

- **Racial Equity:** BIPOC students are disproportionately likely to be identified as “emotionally disturbed” in order to access special education services. While this update will not directly impact the inappropriate identification of students, it will address the harmful impacts of the label “emotional disturbance.”

Students who are houseless and students in rural communities are more likely to have challenges accessing medical care, particularly medical care from a physician as opposed to a nurse practitioner or other provider. This update will increase access to special education eligibility for those students by removing the unnecessary barrier of a medical examination from certain categories.

- **Fiscal/Economic & Small Business Impact:** Districts may incur costs related to updating their student information systems with the new requirements. There are no small business impacts expected.

# Special Education Evaluation & Eligibility OARs

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## Updates Based on Feedback:

- The proposed rules now require a medical statement for an initial evaluation for Autism Spectrum Disorder for children under 5. The medical statement remains optional for children older than 5.
- The rules have been updated to clearly indicate that “documentation of a medical exam” is necessary to clarify the need for paperwork documenting the exam, but not explicitly mandating the type of paperwork required, in alignment with SB 16.
- Duplicative language, as well as grammar and formatting errors, have been removed from the rules.

## Next Steps

- Second reading before the Board on March 16, 2023.
- Additional updates to ensure alignment within and across divisions will follow the passing of this initial rule package.
- The Department will delay implementation of these rules to August 15th, 2023 to allow time for districts to update their systems to reflect the new requirements.
- The Department will provide supports for districts prior to the implementation of this rule, including training and technical assistance support.



# ODE Draft Rules



# Appeals Process Rule Revisions

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# Appeals Process Rule Revisions

**Subject:** Revision of rules related to ODE's complaint and appeals processes pursuant to community listening sessions conducted during the summer of 2022

**Concept:** These amendments would update three OARs related to ODE's complaint and appeals processes.

**Background:** If a student experiences discrimination, restraint, seclusion, or educational retaliation at school, or if a student or parent of a student believes that a school is not complying with the Division 22 standards, the student or parent may file a complaint with their school district. If the student or parent is dissatisfied with the district's response, they may file an appeal with ODE.

The rules codified at OAR 581-002-0002 to 581-002-0023 govern the procedures by which ODE accepts, investigates, and resolves these types of appeals.



# Appeals Process Rule Revisions

## Timeline:

- **Any previous engagements?** During the summer of 2022, ODE held eight separate listening sessions. A total of 44 invitees attended the sessions. Invitees included students, parents and caregivers, advocates, administrators from nine school districts, COSA, OSBA, and members of other education related organizations.

The purpose of the listening sessions was to gather input from the community about ODE's appeals processes and to elicit suggestions for improvement. ODE's goal was to increase the equity, clarity, and accessibility of the processes for students and families and the education entities that serve them.

# Appeals Process Rule Revisions

## Timeline (con.):

- **What previous feedback have you heard?** At the listening sessions, ODE proposed making three changes to its appeals process rules. ODE received overwhelmingly positive feedback on two of the proposals and generally negative feedback on the remaining proposal. ODE is only moving forward with the two changes that received positive feedback during our external engagement.

Additionally, the greatest criticism of ODE's appeals process is the length of time that it takes ODE to resolve an appeal. ODE is proposing a third change in response to that concern.

ODE is continuing to communicate with and solicit input from individuals who participated in the listening sessions to improve its appeals processes, including for this proposed rule change.

- **Where are you in the process of rulemaking?** ODE plans to submit the proposed amendments to the State Board of Education on March 16, 2023 for first reading.

# Appeals Process Rule Revisions

- **Proposed Rule Change #1**

- Add a definition of “complaint” to the rules to clarify that ODE will accept appeals when complainants file informal grievances with education entities, including oral complaints alleging discrimination, unless the education entity directs the complainant to file a formal complaint.

**“Complaint” includes any written report of wrong doing or written grievance that a complainant emails, mails, or otherwise communicates to a district or district staff member, or any verbal report of discrimination, that is not filed in accordance with a district’s complaint process unless the district, within 10 days of receiving the report or grievance, directs the complainant, in writing in the complainant’s preferred language, to file the report or grievance in accordance with the district’s complaint process. See OAR 581-002-0001(1).**

- Does this rule change mirror statute? No
- Does the RAC have any flexibility in proposing additional and/or different rule language? Yes

# Appeals Process Rule Revisions

- **Proposed Rule Change #2**

- Amend the rules so that when ODE finds a violation of a Division 22 standard, the complainant and the educational entity no longer have an opportunity to resolve the matter through conciliation before ODE issues a final order. Instead, ODE will issue a final order immediately. The theory behind the change is that whereas other types of violations, like discrimination, concern individuals, violations of Division 22 standards are public complaints involving the entire student body.

If the department determines that a violation of a law or rule described in ~~OAR 581-002-0003~~ **OAR 581-002-0003(1), (2), (3), (4) or (5)** occurred, the department must issue a preliminary order to the complainant and the district. See OAR 581-002-0009(3)(a)(A).

# Appeals Process Rule Revisions

- **Proposed Rule Change #2 (con.)**

**If the department determines that a violation of a rule described in OAR 581-002-0003(6) occurred, the department must issue a final order in accordance with OAR 581-002-0017. See OAR 581-002-0009(3)(a)(B).**

- Does this rule change mirror statute? No
- Does the RAC have any flexibility in proposing additional and/or different rule language? Yes

# Appeals Process Rule Revisions

- **Proposed Rule Change #3**

- Amend the rules so that when ODE finds that an education entity did not commit a violation, ODE may issue a notice of compliance as opposed to a final order. The theory behind the change is that ODE can be more responsive to violations and provide students, when there is a violation, with a more timely response.

**If the department determines that a violation of a law or rule described in OAR 581-002-0003 did not occur, the department may: (i) Issue notice that the department is closing the case; or (ii) Issue a final order in accordance with OAR 581-002-0017. See OAR 581-002-0009(3)(a)(C).**

- Does this rule change mirror statute? No
- Does the RAC have any flexibility in proposing additional and/or different rule language? Yes

# Proposed Rule Impacts: Appeals Process Rule Revisions

## **Racial Equity:**

- ODE receives more complaints alleging discrimination on the basis of protected class, including on the basis of race, than any other type of complaint. Of complaints where ODE determines a violation occurred, the majority involve discrimination. The proposed amendments will clarify processes for racial minorities and the educational entities serving them and allow ODE staff to allocate more of their time to incidents involving discriminatory conduct.

## **Fiscal/Economic & Small Business Impact:**

- None



# Updates to ODE's Health Services Rule

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# Updates to ODE's Health Services Rule

Subject: Modernizing and updating [OAR 581-022-2220](#) - the Division 22 Health Services Rule

Concept: Updating requirements for Health Services plans and programming for school districts and public charter schools. This rule includes requirements for communicable disease planning for schools.

Background: [OAR 581-022-2220](#) was established in 1980, and requires school districts to have Health Services plans. The last update to this rule was in 1996. The rule includes communicable disease management plans, vision requirements, nursing staff to student ratios, isolation of ill students, first-aid trained staff-to-student ratio requirements, and more.

This proposed update maintains these state standards, adds clarity to requirements related to nursing and delegation, incorporates lessons learned during the pandemic, aligns expectations for health services with those for health education, and updates rules and statutes referenced.

# Proposed Update: Section 1 - 1.a.

(1) School districts, education service districts, and public charter schools shall develop, implement, and annually update a written prevention-oriented health services plan for all students. The plan must describe a health services program for all students at each facility that is owned or leased where students are present for regular programming. The health services plan will be created and maintained by the administration of each district and charter school serving students. Health services plans must include:

(a) Health care space that is appropriately supervised and adequately equipped for providing health care and administering medication or first aid.

# Proposed Update: Section 1.b.

(b) Communicable disease prevention and management plan that includes school-level protocols for:

(i) Notifying the local public health authority (LPHA) if absence due to illness threshold, as established by the Oregon Health Authority (OHA) or LPHA, of students and staff is attained.

(ii) Exclusion of individuals consistent with OAR 333-019-0010, with a description of an isolation space that is appropriately supervised and adequately equipped and that can be used exclusively for the supervision and care of a sick child when a sick child is present in the school.

(iii) To implement mitigation measures if cases warrant or if recommended by the Oregon Health Authority or LPHA.

(iv) For identifying, understanding and responding to the needs of students who are more likely to have severe disease outcomes or loss of access to education due to a communicable disease, and responding to those needs.

(v) For responding to the mental health impacts of a communicable disease outbreak in the school.

(vi) To ensure continuity of education for students who may miss school due to illness.

# Proposed Update: Section 1.c.

(c) A district-to-school communication plan that includes:

(i) A point of contact to facilitate communication, maintain healthy operations, and respond to communicable disease questions from schools, state or local public health authorities, state or local regulatory agencies, students, families and staff;

(ii) Protocol to provide all staff and families with contact information for the point of contact; and

(iii) A process to notify as soon as possible all families and other individuals if there has been a case of a restrictable disease as defined by OAR 333-019-0010 on the premises if advised by an LPHA or the OHA.

# Proposed Update: Section 1.d - 1.h.

(d) Health screening information, including required immunizations and TB certificates, when required by ORS 433.260 and 431.110 and OAR 333-019-0010.

(e) Services for all students, including those who are medically complex, medically fragile or nursing dependent, and those who have approved 504 plans, individual education program plans, and individualized health care plans or special health care needs as required by ORS 336.201, 339.869, OAR 581-021-0037, 581-015-2040, 581-015-2045, and 851-045-0040 to 0060;. and 851-047-0010 to 0030.

(f) Integration of school health services with school health education programs and coordination with health and social service agencies, public and private.

(g) Dental and vision screening as required by ORS 336.211 and 336.213.

(h) Process to assess and determine a student's health services needs, including availability of a nurse to assess student nursing needs upon, during, and following enrollment with one or more new medical diagnose(s) impacting a student's access to education, and implement the student's individual health plan prior to attending.

# Proposed Update: Section 1.i - 1.k.

- (i) Compliance with OR-OSHA Bloodborne Pathogens Standards for all persons who are assigned to job tasks which may put them at risk for exposure to body fluids per OAR 437-002-0360.
- (k) Policy and procedures for medications, as per ORS 339.866 to 339.874 and OAR 581-021-0037.

# Proposed Update: Section 1.j.

(j) Guidelines for the management of students who are medically complex, medically fragile, or nursing dependent as defined in ORS 336.201 including students with life-threatening food allergies and adrenal insufficiency while the student is in school, at a school-sponsored activity, under the supervision of school personnel, in before-school or after-school care programs on school-owned property, and in transit to or from school or school-sponsored activities. The guidelines must include:

(i) Standards for the education and training of school personnel to manage students with life threatening allergies or adrenal insufficiency;

(ii) Procedures for responding to life-threatening medical conditions including allergic reactions or adrenal crisis;

(iii) A process for the development of an individualized health care plan for every medically complex, medically fragile, nursing dependent student, including students with a known life-threatening allergy and an individualized health care plan for every student for whom the school district has been given proper notice of a diagnosis of adrenal insufficiency per OAR 581-021-0037;

(iv) Protocols for preventing exposures to allergens; and

(v) A process for determining if or when a student may self-carry prescription medication when the student has not been approved to self-administer medication as allowed by 581-021-0037.

# Proposed Update: Section 2

(2) School districts, education service districts, and charter schools shall ensure that nurses who provide health services to students are licensed to practice nursing by the Oregon State Board of Nursing (OSBN):

(a) School districts, education service districts, and charter schools may employ Licensed Practical Nurses (LPN) in alignment with LPN supervision requirements of OAR 851-045-0050 to 0060.

(b) Job descriptions and nursing delegation considerations shall reflect assignments complying with the Oregon State Board of Nursing Scope of Practice Administrative Rules for all levels of licensed providers, including standards for the evaluation and assessment of students, provision of services, medication administration, supervision of unlicensed staff and documentation of services provided per Division 47.

(c) School districts, education service districts, and charter schools, that employ Registered Nurses who are not certified by the Teacher Standards and Practices Commission as school nurses, shall not designate such personnel as "school nurse" by job title.



# Proposed Update: Section 3

(3) Each school shall have, at a minimum, at least one staff member with a current first aid/CPR/AED card for every 60 students enrolled, as set by ORS 339.345, and 342.664 and who are trained annually on the district and building emergency plans. Emergency planning will include the presence of at least one staff member with a current first aid/CPR/AED card for every 60 students for school-sponsored activities where students are present.

# Proposed Update: Sections 4 and 5

(4) Schools that contract or pay for health services must ensure services are comprehensive, medically accurate, and inclusive as defined by OAR 581-022-2050.

(5) Each school building must have a written plan for response to medical emergencies; such plan should be articulated with general emergency plans for buildings and districts as required by OAR 581-022-2225.

# Timeline of Engagements

- Prior engagements:
  - Partnered with the Office of Enhancing Student Opportunities
  - Oregon Health Authority, October 2022
  - Superintendents of Small, Medium, Large Districts, Education Service Districts, November 2022
  - School District Health Aides, November 2022
  - Charter School leaders, December 2022
  - Oregon School Nurses Association members, December 2022
  - Oregon School Employees Association and the Oregon Education Association, January 2023
  - Coalition of Superintendents Association and the Oregon School Board Association, February 2023
- Where we are in the process of rulemaking?
  - 1st reading for the State Board of Education, April 20th
  - 2nd RAC reading, May 18th
  - 2nd reading for the State Board of Education, June 15th

# Rule Update Impacts: Health Services Rule

## *Racial Equity:*

- Provides space for public schools on how they can support those disproportionately impacted by COVID-19, RSV, flu, and other communicable diseases

## *Fiscal/Small Business Impact:*

- Fulfills requirements under ESSER III for schools to continue to use ESSER III funds for the 2023 - 2024 academic year

# Thank you!

# Questions?



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# Menstrual Dignity for Students

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# Menstrual Dignity for Students

**Subject:** The provision of menstrual products in all school bathrooms

**Concept:** The Menstrual Dignity Act, enacted in July of 2021, requires that educational providers stock menstrual products in all student bathrooms by the end of the 2022-23 school year. The Menstrual Dignity For Students Rules (OAR 581-21-0587 through OAR 581-21-0596) outline program requirements.

**Background:**

- Lack of access to menstrual products and menstrual health education can have long-lasting and negative effects on young people, including: emotional anxiety, traumatic experiences, as well as education setbacks and medical issues.
- The Menstrual Dignity For Students Rules (OAR 581-21-0587 through OAR 581-21-0596) live within Division 21.
- The State Board of Education will soon be considering whether to connect the Menstrual Dignity for Student requirements to Division 22.

# Menstrual Dignity for Students

## Timeline:

- The original statute came into effect on July 1, 2021.
- Temporary rules were adopted by the State Board of Education on January 20, 2022.
- Permanent rules were adopted by the State Board of Education on March 17, 2022.
- ODE has heard from school community members expressing concern about the accountability measures of the rules within Division 21.
- First reading for proposed Division 22 rule at March 16, 2023 State Board meeting.



# Division 22 Standards: The Big Picture



Oregon Department of Education

- All Oregon administrative rules (OARs) set out in Chapter 581, Division 22, Standards for Public Elementary and Secondary Schools.

Example: 581 - 022 - 0102 Definitions  
Ch. Div. Rule Title

- The standards that the Oregon legislature or the State Board has determined must be met in order to be a standard school district.
- Compliance with these rules ensures a baseline level of service across the state.

# Division 22 Standards: Monitoring Compliance

## Division 22 Assurances Process

Require school districts to certify to their local community and ODE that they are in compliance with Division 22 Standards.



**SPECIFIC  
POINT IN TIME**

## Includes Ongoing Coaching & Professional Learning

Assist districts in understanding and complying with the standards.



**CONTINUOUS**

## Complaint Process

Enforce school districts to meet the standards upon the filing of an appeal.

# Menstrual Dignity for Students

**Feedback and comments** received from the parents, students, and school staff:

**By having district leadership certify that they are in compliance yearly, it will remind them of the importance of the work and push them to double check that they are truly in compliance. I also appreciate that it would allow for a complaint process, which is much needed for the rule. I worry about students and families who feel that their needs may not be met by districts who are not compliant and having no way of voicing their concerns.**

**A School District Health Services Director**

**I support this change and greater accountability for districts. We have districts that do not plan to comply and/or school boards that do not want to comply and want to direct staff not to comply. Staff and districts need both the leverage, protection and impetus to follow this law and implement it for the benefit of students.**

**A Superintendent of a mid-sized District on the I-5 corridor**

# Menstrual Dignity for Students

**Feedback and comments** received from the parents, students, and school staff:

**We are getting "Ruled" to death. Our district is in compliance and will continue to be because it is the right thing to do, but the last thing we need is additional rules and reporting requirements.**

**A Superintendent of a rural District**

**I also have been told that many other districts are being silently non-compliant. Including this as a Division 22 requirement may burden ODE with many new complaints and I know that the agency is severely understaffed with people who process those complaints. Rural schools with more conservative families are rarely considered when these rules are made. It really puts the superintendents in a bind and has the very real possibility of political problems, even up to job loss for really good people.**

**A Superintendent of a rural District**

# Menstrual Dignity for Students

## **OAR 581-022-XXXX Menstrual Dignity for Students**

All public school districts and charter schools must comply with the requirements imposed upon education providers in ORS 329.545, OAR 581-021-0590 Menstrual Dignity for Students: Requirements, and OAR 581-021-0593 Menstrual Dignity for Students: Education.

# Proposed Rule Impacts: Menstrual Dignity for Students

## *Racial Equity:*

- Connecting the Menstrual Dignity for Students Rules to Division 22 will promote equity for all students who menstruate, especially those who lack access to menstrual products for many reasons. This program will help all students access their education without shame and with their basic needs met.

## *Fiscal/Small Business Impact:*

- These rules will not impact small businesses.
- We have heard from school districts that the funds allocated by the statute will not cover their actual costs to cover menstrual product provision.

# Menstrual Dignity for Students

## Questions for the RAC:

- Are there any unanticipated impacts of connecting these rules to Division 22?
- Are there any other partners that we should engage with?

# Preview of April 6 Agenda

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- Rules-at-a-Glance:
  - Appeals Process Rule Revisions
  - Health Services
  - Menstrual Dignity for Students
  - Variance Requests for Pupil Transportation Vehicles
- Draft Rules:
  - School Sports Pre-Participation Examination Form: OAR 581-021-0041



# Thank you



The background is a dark space filled with numerous small white stars. On the left side, there are two larger stars: a bright white one and a smaller yellow one. On the right side, there is a large, detailed blue planet with visible atmospheric bands and a horizon line. The text is overlaid on this scene.

# **OPEN SPACE**

**Any further questions or comments  
on any agenda item or any topic not  
on our agenda...**