



SALAM NOOR  
Deputy Superintendent of Public Instruction

**Joel Smallwood, Salem Keizer School District, Manager of Maintenance of Maintenance and Construction Services**

- The 3 T's document is very unclear to those of us in the field who are trying to interpret it. We would like to see clarification in the rule for how to guide us. Everybody seems to have a different interpretation and currently using their best judgement and sampling done in different ways.
- Funding for this is a concern for our district and other districts in the state
  - Remediation can also get up in costs depending what we find
- Rule is growing rapidly, but it does not show what we are looking at right now. Spreading our people and resources too thin.
  - Incredibly short timeline
  - In my experience, leads to rules that can't be sustained long term
- For, initial and follow up sampling the 3 T's are not clear
  - Where students and staff are present – define regular
  - Need clear definition of which 5% are tested
  - Would like 200% in the rule to go away because does not add up for PPB

**Joe Crelier, Portland Public School District, Director of Risk Management**

- Portland Public School is in agreement that this rule is a good thing going forward
- Would like to propose this rule is not adopted at this time
  - Perhaps January 2017
  - Before adoption would like to see funding or funding assistance for administering these programs
  - The indoor air quality checklist may not have been electronically distributed
  - Rule should not be adopted until all of the check lists can be reviewed by schools for regulations or standards
- Regarding the SB 447 checklist that was circulated at the stakeholder meeting, there would need to be significant revision if this were to be used as the indoor air checklist.
- Having a hard copy of results is typically not a burden in most cases, but this rule should align with public records requests.

Respectfully submitted this 15<sup>th</sup> day of August, 2016

Emily Nazarov  
Hearing Officer



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BEFORE THE OREGON DEPARTMENT OF EDUCATION

RULE HEARING: OAR 581-024-0275, Facilities, Safety and Emergency Planning

HEARING OFFICER'S REPORT

The Department held a public hearing on August 11, 2016, to receive public comment on the proposed rule amendments. Notice of hearing was published in a timely manner in the Secretary of State's bulletin and was sent to interested parties and persons who requested notice pursuant to ORS 183.335 (7). The hearing was held at the Department's offices in Salem, Oregon before Emily Nazarov, Hearing Officer.

Testimony:

No public comment.

Respectfully submitted this 15<sup>th</sup> day of August, 2016

A handwritten signature in cursive script that reads "Emily Nazarov".

Emily Nazarov  
Hearing Officer