

## School-Based Health Center Program Rules Advisory Committee

**November 17, 2025 @ 10:00AM**

### Summary Notes

**Attendees:** Tamarra Harris (Mosaic Community Health), Elise Travertini Windbigler (La Clinica), Robin Friebur (Outside In), Kristen Weidner (Neighborhood Health Center), Ben DeGiulio (Clackamas County Health Centers), Jennifer Reid (Community Health Centers of Benton & Linn Counties), Tami Gilbertson (Clackamas County Health Centers), Kate O'Donnell (SPO), Melanie Potter (SPO), Stefanie Murray (SPO), Meanroth Ny (SPO), Karen Vian (SPO), Rebecca Jacobs (SPO), Megan Tatge (SPO)

### Welcome, Introductions and Review of Agenda

*Supporting Document: SBHC RAC Agenda – 11.2025*

- Introductions
- The goal of the meeting is to review paperwork SPO will submit for rules change process. Update OARs to reflect changes to Standards from modernization process.
- SPO reviewed the meeting agenda, meaning of serving on RAC and limitations, overview of SBHC Standards revision process, and different paperwork components sent to attendees. (Agenda, 333-028 *Notice of Proposed Rulemaking Hearing\_SBHC-RAC\_11.2025*, 333-028 *SBHC SNFI\_2025-RAC-v1*, 333-028 *SBHC-Rule-Revisions\_TrackChanges\_RAC\_v1-10.23.2025*, *SBHC-CertificationStandards\_v5\_TrackChanges\_RAC\_v1\_10.23.2025*).
- SPO reviewed process thus far. Beginning in 2022 conducted literature review, surveyed SBHCs, engaged youth & other partners, drafted text, convened Standards for Certification workgroup in 2023-2024, presented the proposed changes to SBHCs in Fall 2024, conducted additional

engagement & SBHC surveys, presented to CLHO 3 times in 2023-2024, and finalized the Standards. Met with DOJ for 4 months regarding language that was proposed, finished in September 2025. Shared where the RAC falls within the OAR rulemaking process.

### **Review Proposed Notice of Rulemaking**

*Supporting Document: 333-028 Notice of Proposed Rulemaking Hearing\_SBHC-RAC\_11.2025*

- SPO went through each section of the Notice of Proposed Rulemaking Hearing document and document link was shared with RAC members. Members were asked to provide questions and comments.
- No RAC feedback.

### **Review Statement of Need and Fiscal Impact**

*Supporting Document: 333-028 SBHC SNFI\_2025-RAC-v1*

- SPO went through each section of the Statement of Need and Fiscal Impact document and distributed document link to RAC members. Members were asked to provide questions or comments on each section.
- Need for the Rules section: No RAC feedback.
- Documents Relied Upon section: No RAC feedback.
- Racial Equity Impact Statement section:
  - Group discussed concerns about use of “racial equity” language, given federal guidance to remove “equity” language for entities that receive federal funding. SPO responded that the Racial Equity Impact Statement is a requirement of the state rulemaking process and will be reviewed at the state level. The data and information shared in the Racial Equity Impact Statement are similar to what the SPO has shared in other settings ([2025 SBHC Status Update](#), public presentations, etc.) about SBHC clients and utilization.
- Fiscal and Economic Impact section: No RAC feedback
- Statement of Cost of Compliance section:
  - Karen stated that the number of sites not meeting the contraceptive dispensing requirement is now lower than 13 of 89 SBHCs.
  - Melanie noted the number reflects the number of SBHCs that would need to make changes to comply and doesn’t reflect those that have

already updated their services. Tracking of SBHC preparations for the rule and Standards changes is ongoing.

- No RAC feedback.

### **Review SBHC Program Oregon Administrative Rules (OARs)**

*Document: 333-028 SBHC-Rule-Revsions\_TrackChanges\_RAC\_v1-10.23.2025*

- Recent engagement efforts to modernize the rule text and SBHC Standards for Certification have resulted in proposed changes to the SBHC Program OARs. SPO made a few additional changes after consulting with DOJ. The changes are intended to clarify process and remove any duplicative language.
- SPO described major changes to the rules.
- Definitions section: No RAC feedback.
- Certification Requirements section: No RAC feedback.
- Application & Certification Renewal section: No RAC feedback.
- Required Trainings section: No RAC feedback.
- Transfer of Medical Sponsorship section: No RAC feedback.
- Verification section: No RAC feedback.
- Requesting Changes to Certified SBHCs section: No RAC feedback.
- Compliance section: No RAC feedback.
- Closure or Surrender of Certification section: No RAC feedback.
- Funding Criteria for Certified SBHCs section: No RAC feedback.
- Funding Criteria for SBHC Planning Communities section: No RAC feedback.
- Funding Criteria for Incentive Funds section: No RAC feedback.

### **Review SBHC Standards for Certification, Version 5**

*Documents: SBHC-CertificationStandards\_v5\_TrackChanges\_RAC\_v1\_10.23.2025*

- Each section of the Standards for Certification, Version 5 was referenced, and major changes were described. The RAC was asked for feedback.
- Section A: No RAC feedback.
- Section B: No RAC feedback.
- Section C: No RAC feedback.
- Section D: No RAC feedback.
- Section E: No RAC feedback.
- Section F:

- Elise Travertini- Windbigler mentioned that in Section F.1, Table 2, row with Condom Availability requirement has a superscript footnote reference of 3, 4 but there is no footnote below the table.
- Melanie confirmed this is an error and the footnote references (3,4) will be updated.
- Section G: No RAC feedback.
- Section H: No RAC feedback.
- Section I: No RAC feedback.
- Group discussed how Standards may be changed or enforced differently, given changing federal guidance. Questions if state will develop more explicit guidance on some topics covered in Standards for Certification, Version 5. SPO responded that Standards requirements are aligned with local, state, and federal law. The new requirements have been shared with OHA leadership. They have not recommended any changes to the Standards at this time.

## **Next Steps**

- Review any proposed rule changes and make any final revisions.
- The SPO will submit the rules forms to the Rules Coordinator who will file notice of proposed rulemaking with Secretary of State.
- SPO will update the website with any changes.
- In the Spring after the legislative session, the SPO will hold a public hearing with a public comment period.
- SPO will respond to the comments and make any finalized changes.
- SPO will file the permanent rules with the Secretary of State office.
- The new rules will go into effect July 1, 2026.
- The SPO will share the RAC minutes, copies of the revised text and information about the public comment period with the RAC members.