



BOARD OF COUNTY COMMISSIONERS

LINDSAY BERSCHAUER • KIT JOHNSTON • MARY STARRETT

535 NE Fifth Street • McMinnville, OR 97128-4523
(503) 434-7501 • Fax (503) 434-7553
TTY (800) 735-2900 • www.yamhillcounty.gov

Elizabeth Ross - elizabeth.ross@omb.oregon.gov
Oregon Medical Board Legislative and Policy Analyst
Re: PROPOSED RULEMAKING
CHAPTER 847
OREGON MEDICAL BOARD

Ms. Ross,

Acknowledging the deadline for comment on this rule was May 22, 2024, and with the understanding that this proposed rule change could have profound and long-term impacts on medical professionals practicing in or re-locating to Oregon, please kindly accept and submit our testimony in opposition to the proposed rulemaking in Chapter 847.

<https://www.oregon.gov/omb/statutesrules/Documents/847-010-0073.pdf>

The proposed change *cites* "... discrimination through unfair treatment characterized by implicit and explicit bias, including **microaggressions, or indirect or subtle behaviors that reflect negative attitudes or beliefs about a non-majority group**".

Would a doctor face losing a medical license because of a perceived "micro aggression" for addressing a patient's unhealthy Body Mass Index? Or for bringing up any number of race or gender- specific health conditions such as *Tay-Sachs, Niemann-Pick, Canavan's, and Gaucher's* disease which largely impact those of Eastern Jewish descent or *Sickle cell Anemia* which typically afflicts people of African, Mediterranean, or Middle Eastern descent?

If doctors could be sanctioned for making a comment to a patient of a "non- majority group" that is misinterpreted, this could stifle forthright doctor-patient communication and could result in eroding the quality of healthcare in our State.

Existing rules on provider behavior are sufficient to protect patients.
This proposed rule change is concerning on so many levels and could potentially impact the already critical shortage of physicians in Oregon and our community.

The Yamhill County Board of Commissioners is strongly opposed to this proposed rule change and respectfully requests these comments be included as testimony.

Sincerely,

Lindsay Berschauer
Chair

Kit Johnston
Vice-Chair

Mary Starrett
Commissioner

Approved by the Yamhill County Board of
Commissioners on 06/27/2024
Via Board Order 24-187