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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

MULTNOMAH COUNTY, an existing
county government and a body politic and
corporate,

Plaintiff,

v.

ALEX M. AZAR II, in his official capacity
as Secretary, U.S. Department of Health and
Human Services; VALERIE HUBER, in her
official capacity as the Senior Policy Advisor
for the Office of the Assistant Secretary of
Health and the Acting Deputy Assistant
Secretary for the Office of Population
Affairs; and U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES

Case No. 18-cv-01015-HZ

DECLARATION OF
LISA SAUNDERS

In Support of Plaintiff's Motion for
Preliminary Injunction and Partial
Summary Judgment

Defendants.

DECLARATION OF LISA SAUNDERS

I, Lisa Saunders, declare as follows:

1. I am the Manager of Strategic Partnerships at Self Enhancement, Inc., known as SEI. I have worked in the area of strategic project management at SEI for 20 years. I presently oversee SEI's participation in Multnomah County's Adolescents & Communities Together ("ACT") program through a \$90,000 annual grant subaward as part of the federal Teen Pregnancy Prevention Program.

2. SEI is a non-profit organization based in Portland, Oregon that is dedicated to working with schools, families and partner organizations to assist African-American youth and their families overcome cultural, educational and economic barriers. Founded in 1981, SEI presently provides over 14,000 youth, families, and adults with a wide array of education and social services, including sexual education programming. Our organization embraces an "abstinence first" philosophy regarding sexual health education, where we prefer that teens wait to have sex and have made this a focus of our programming. In recognition that abstaining from sex is not the reality for all our youth, we also engage in a broad conversation with teens and their families about sexual health, including discussing healthy relationships and giving them accurate information to make responsible decisions and protect themselves. Ours is a resiliency-based model in which we meet teens where they are and give them the tools to succeed in this and other areas.

3. SEI has been a community partner with Multnomah County in the ACT program since 2015. In this role, we have been teaching a comprehensive evidence-based sexual education program selected from the list published by the Office of Adolescent Health as part of a 6-week

summer program and throughout the school year in SEI's after-school programs. These programs have educated 320 teens and have had positive impacts, including on their knowledge of sexually transmitted infections.

4. Notwithstanding SEI's "abstinence first" focus, the new Tier 1 Funding Opportunity Announcement ("FOA") conflicts with our mission and values in multiple regards. For example, I understand the FOA to be requiring that we "clearly communicate that teen sex is a risk" on par with using drugs or riding a car without a seat belt that could lead to multiple negative sociological and economic consequences. We believe that messages like this are fear and shame-based, a form of sexual education that conflicts with our resiliency-based model and can actually be harmful. Adding messages like this to our program would tamper with the evidence base of the program we are using and the accurate information that we are committed to giving our youth.

5. We were notified by the County in the first week of July 2017 that our subaward as part of the ACT program would be cancelled on June 30, 2018 after the County's grant was terminated. Our funding as part of this program had paid for a part-time sexual health educator, who left in early June as a result of our anticipating losing the subaward.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing
is true and correct.

Executed on June 21, 2018 in Portland, Oregon.



Lisa Saunders