

For immediate release

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Response and Emails Re Efforts to Terminate Ottawa County Public Health Department Officer Adeline Hambley

On September 27, 2023, Joe Moss unilaterally filed Charges allegedly justifying removal of Adeline Hambley as Health Officer, and he alone scheduled a special meeting to hear these charges on October 19, 2023. This action is consistent with the Commission's vote—led by Moss—in its first meeting on January 3, 2023 attempting to demote Hambley to "interim" Health Officer without a hearing, even a sham hearing, to comply with state law. It is also consistent with Moss's public remarks during his campaign, and ever since, about his goal to remove Hambley in favor of his selected candidate, Nate Kelly. However, this is not permitted under state law.

When Hambley sued over the violations of law in trying to remove her, the trial court decided that she is the Health Officer and directed that Hambley not be removed while her case was pending. When Moss and the other defendants appealed, the Court of Appeals said they could hold a hearing only in the limited circumstances authorized by statute, and the Court of Appeals scheduled an oral argument for October 11, 2023 to hear the defendants' appeal. The October 19, 2023 hearing is Moss' attempt to hold a hearing and claim that it justifies his goal all along in removing Hambley. But the Charges are untrue and do not justify removing Hambley.

Below is further information which is left out of the Charges from Moss. More information and response will be released as it is gathered and prepared. Two PDF files are with this summary–(1) <u>Press Contact Policy PDF</u> on whether Hambley can communicate directly with the public or needs Gibbs's (and Moss's) permission first;

and (2) <u>Communications on Public Health Budget PDF</u> with 557 pages of previously-unreleased email communications relevant to these issues.

More will be produced and made public as they are available. Here are the key points, and following that, the string of emails and actions taken.

Hambley was not actively involved in the budget process; Moss and Gibbs actively tried to work around her as of August 2023

- The Charges¹ by Joe Moss claims that Health Officer Hambley has been "actively involved in the budget process." This is untrue. Administrator John Gibbs—at Moss's direction—has given directions solely to Fiscal Services personnel to make multiple revisions and cuts to the Public Health Budget starting in early August 2023. Moss actively cut Hambley and most of his fellow Commissioners out of the budget process. While it's true that Hambley participated fully in the normal budget cycle process, she was, in fact, cut out of the rushed, haphazard, multiple-new-draft, version of the budget process directed by Moss and Gibbs starting around the beginning of August 2023.
- Fiscal Services personnel asked Hambley questions and provided her information as they were implementing Administrator Gibbs' demands. While Fiscal Services provided Hambley with updates and information that Hambley sought out, this is distinctly different from being "actively involved in the budget process" in any ordinary understanding of the process.

Moss and Gibbs' demands were completely unactionable

 Moss and Gibbs demanded that Hambley provide a new budget-slashing the County General Fund contribution from \$6.68 million to \$2.5 million—in a day and a half—at the same time that Administrator Gibbs and others determined that asking any other county department to cut even 5 percent was not feasible over a much longer timeframe. Normally, departments put together a budget starting in January and finalize it in June, which is what Hambley did—but hers was entirely scrapped in August.

Hambley did not ignore Gibb's demands

¹ The "Charges" refer to Joe Moss's charges allegedly justifying removal of Health Officer Hambley that he unilaterally filed on September 27, 2023. These will be the subject of the Special Commission Meeting currently scheduled for October 19, 2023.

- Hambley did not "ignore" Gibbs' demands on August 22 and 23 to produce a
 budget of \$2.5 million. She explained that she and Fiscal Services had attempted
 to rework the budget as demanded, but they could not because it was impossible
 with that level of General Fund contribution to fund state mandates, pay Public
 Health's portion of Administration costs which come out of every department's
 budget, and still keep the Public Health doors open much past fall 2023.
- The recent claim in the Charges that what Gibbs intended was that Hambley could send back a budget "as close to \$2.5 million as possible," and that she was free to go over \$2.5 million, is disingenuous. No reasonable person would read Gibbs' demand to mean Hambley was free to send something back that exceeded \$2.5 million, and certainly the county's Fiscal Services personnel did not read it that way either.

Moss' claim that their plan was only an "internal" idea is deeply disingenuous

- Moss falsely claims that his plan to cut the county general fund contribution to Public Health to \$2.5 Million was only an "internal" idea under discussion among county officials at the time.
- In fact, Joe Moss published his plan in a public press release on August 22, 2023, claiming this is what the Board would consider as a budget, even though it appears that only Ottawa Impact-affiliated Commissioners were informed at first. Commissioners Sylvia Rhodea and Allison Miedema were also publicly sharing this intention to slash the general fund contribution in the same manner.
- Moss had also been promising large cuts to the Public Health budget (and selecting his own Health Officer) since his campaign for Commissioner.

Moss' press release preceded Health Officer Hambley talking to the press about the attempt to cut General Fund contribution to \$2.5 million

- Chairman Joe Moss published a press release <u>before</u> Health Officer Hambley spoke with the press on this point, boasting about cutting the general fund contribution to the county's Public Health Department to \$2.5 million.
- His press release proclaims: "... A majority of the current Board of Commissioners has clearly stated they will prioritize limited government, family values, individual freedoms, and parental rights...It's time for Ottawa County to rein in the out-of-control expenditures and augmented influence of the Public Health Department..."
- [See Joe Moss Press Release 8/22/2023]

Information about the operation of county government belongs to the public

- Nothing about this information is private or secret, even if Health Officer Hambley
 had been the first one to make it public (which she was not). It is information
 about the operation of the county government which belongs to the public.
 Information about the potential impact of budget cuts at this level also belongs to
 the public—and the rest of the County Commissioners.
- Under the Public Health Code in state law which gives the local health officer the
 ability to communicate directly with the public, there was nothing wrongful about
 Health Officer Hambley advising the public that deep cuts of this nature to public
 health programs were being considered, when those would directly affect the
 public health in the community. In fact, it would have been wrong if she went
 along with this plan and stayed silent about the consequences solely to appease
 Moss and Gibbs.

Moss misquoted Hambley's emails in his Charges

• Moss's Charges claiming that Health Officer Hambley provided false information to the public about service discontinuation are also inaccurate. Hambley's public statements about proposed budgets talked about what the County Administration was considering, and why that would be problematic, including lost services if those proposals went forward. Nowhere did Hambley claim or infer that the Board had already acted. Moss and other OI-aligned Commissioners put out the same types of communications about what they were proposing. The Charge itself also selectively quotes and misquotes Hambley's email to the Public Health staff. Exhibit G of the Charge contains Hambley's actual, complete August 25, 2023 email to Public Health staff:

"Good morning everyone.

As I am sure you all are aware, there is a lot of conversation happening around the fiscal year 2024 budget for Public Health. At this time, budgets are still being discussed by the Board of Commissioners in the Finance Committee Workgroup. If you have clients contacting you with concerns, please let them know that services are continuing as usual and budgets have not yet been finalized so we are unable to give definitive answers as to what will happen after October 1, 2024. If they would like to discuss further, you can transfer them to Kris Conrad (393-5775) and she will process messages and make sure they get a call back. If it is specifically

media related, you can transfer to Alison Clark (494-5597). Clients can also share their concerns with their elected officials.

During this uncertain time, please try and reassure community members that reach out – let them know they are important and valued and we will communicate any changes to services as soon as we know more.

Thank you so much for your dedication to the community we serve, and as soon as I know more, I will keep you updated.

Adeline Hambley"

 That was all correct. In addition, the body of Moss' Charges also misquotes, and misleadingly selectively quotes, content from emails in Exhibits L and O.

Moss' next revised budget still provided just \$2.5 million from the general fund, while raiding the Public Health savings from its fund balance to make up the extra money

 When Moss revised the OCPHD's budget to \$3.8 million, it relied on taking money from Public Health's fund balance (its savings)—not the county's general fund. The proposal at that time was still to provide only \$2.5 million from the general fund and to loot the Public Health savings in the fund balance.

Gibb's and Moss' revised proposed budgets still threatened state intervention

 Over the course of the budget slashing and haphazard revision process from County Administration, Gibbs and Moss continually had to put items back into the budget, as Hambley originally proposed them, as they confirmed over and over again that she was correct: That what they proposed would threaten state intervention, loss of grant funds, and other negative outcomes.

The Public Health Code provides for the County Health Officer to speak directly to the public

 Defendants wrongfully assert that the Health Officer is not allowed to speak to the public directly. She is-both under the language of the Public Health Code, and as a "county officer."

- Defendants have implicitly conceded Health Officer Hambley is a "county officer," since only county officers can be required to testify under oath to the Commission, which Defendants required her to do on 9/5/2023.
- Further, Health Officer Hambley advised Administrator Gibbs of her position on her ability to communicate with the public in advance in an email to Gibbs, cc to county legal counsel, when Gibbs purported to require her to get Administration's permission before any public communication. (See 5/10/2023 and 5/23/2023 emails.)
- Administrator Gibbs never responded to this in email or in person, nor did county legal counsel.

Timeline of Communications

The communication included in Moss' Notice of Termination Hearing is highly cherry-picked and incomplete. Here's a more complete timeline of the communication on these issues. All emails are included in an attachment, page numbers below refer to the *Communications on Public Health Budget PDF*.

5/10/2023 (Wednesday): Shannon Felgner (Communications) Email about new policy requiring Administration approval to answer press questions or post information.

- 5/23/2023 (Tuesday): Hambley Email reply to Gibbs and Felgner, providing support for her conclusion that the Public Health Code gives her independent authority to communicate with the public, without Commission approval.
- Neither Gibbs nor County legal counsel, who were also copied, responded.

6/19/2023 (Monday): Budget meeting re: FY24 budget for Public Health with Gibbs, Hambley and others (see calendar invite (p 5)). Originally, Deputy Administrator Patrick Waterman typically attended all budget meetings with Public Health–part of the usual job duties of Deputy Administrator. As of this meeting, Gibbs "disinvited" Waterman, and Commissioner Rhodea attended instead.

8/9/2023 and 8/10/2023: Hambley Emails to Fiscal Services (p 27-28) to provide important information on various budget topics, as Administration was already going around Hambley, directly to Fiscal Services on the Public Health budget.

 Neither Gibbs nor any Commissioner came to Hambley directly for this information, despite having budget meetings for months.

8/16/2023 (Wednesday): Gibbs Email to Hambley, asking about eliminating unfilled positions in family planning.

• 8/16/2023 (Wednesday): Hambley Email to Gibbs (p 29-32), responding that these were already accounted for.

8/17/2023 (Thursday): Gibbs Email to Hambley (p 33), wanting new budget proposal with significant cuts by close of business on 8/18/2023.

• 8/18/2023 (Friday): Hambley response with attachment as requested (p 38-44). Hambley also forwards the same information to Fiscal Services (p 46).

8/22/2023 (Tuesday): Gibbs Email to Hambley (p 49) after Finance Committee meeting requesting a revised Public Health budget, cutting it to \$2.5 million in General Fund contribution by Thursday 8/24/2023 by close of business. (Gibbs said Thursday 8/23/2023 but the date appeared to be a typo and seemed to mean Thursday 8/24/2023.) Gibbs copied Karen Karasinski from Fiscal Services and Jordan Epperson.

- Gibbs refers to Chairman Moss's demand for a cut to \$2.5 million during the Finance Committee meeting when he says "as discussed." Gibbs had no inperson or phone discussions with Hambley about this, and has not had any since 8/4/2023.
- 8/22/2023 (Tuesday 4:59 pm): Hambley Email to Gibbs (p 51) that cutting the budget to \$2.5 million is not feasible and is retaliatory. Hambley advises she will do her best to come up with something by Thursday, but states that she believes this is an impossible ask and highlights some of the immediately apparent problems. She also notes that it appears that all of the budgeting information she has been providing hasn't been shared with Commissioners. She advises that she remains open for questions and presentation directly to the Commissioners.
- 8/23/2023 (Wednesday): Gibbs Email (p 58) acknowledging Hambley Email but telling Hambley to provide a new budget by close of business cutting General Fund to \$2.5 million anyway.
- 8/24/2023 (Thursday): Hambley Email (p 61) providing 3-page attachment (p 62-64) on this budget request, and advising Gibbs that despite working with Fiscal Services, she and Fiscal cannot cut the budget to \$2.5 million and meet state minimum requirements.

8/25/2023 (Friday 3:24 pm): Commissioner Cosby Email to Hambley says Cosby requested a list of information during the Monday 8/21/2023 work session (p 69).

- 8/25/2023 (Friday 7:01 pm): Hambley responds to Cosby (p 80) to advise that Hambley was not aware that Cosby had asked for these items, but that Hambley will work with her team to provide those as soon as she is able. She includes a link to available information on OCDPH programs.
 - 8/26/2023 (Saturday): Cosby thanks Hambley (p 92) for her response and the link.
 - Multiple staff working on gathering data that Cosby wanted, and budget cut information for Fiscal Services.

8/28/2023 (Monday): Administration puts out press release on the Public Health budget, claiming that Hambley's statements about the budget have been false (p 98-100).

8/28/2023 (Monday): Cosby Email to Hambley, and asks when the items she requested will be available.

- 8/28/2023 (Monday): Hambley responds to Cosby (p 120-121), and explains that she has spent most of her weekend and anticipates spending most of her upcoming time to answer questions of Fiscal Services regarding the budget revisions directed by Gibbs, but that she will provide the requested items as soon as she can. Hambley thanks her for her interest and tells her she continues to extend the offer to meet with her or any other Commissioner about Public Health programs.
- 8/29/2023 (Tuesday): Cosby Email to Hambley (p 120), thanking her for "capturing the information I requested." Cosby goes on: stating that Cosby had asked prior Administrator Shay to meet with former Health Officer Lisa Stefanofsky, and stating she had left a voicemail message to request a meeting on Stefanofsky's phone number when Cosby said Shay told Cosby that Hambley would be "interim" Health Officer.
 - See below for emails on this point.
- 8/30/2023 (Wednesday): Hambley Email to Cosby (p 143), attaching some of the information requested by Cosby, as well as prior emails related to other invitations to Cosby and other commissioners for discussions which have some of the information requested. Hambley notes that it appears that some of what she has provided to Gibbs in the past on the budget has not made it widely to Commissioners, so she will start copying Cosby on that information as well. Attached emails from Hambley to Cosby include:
 - 12/16/2022: Email from Shay to Cosby (p 146), copying Hambley among others. Shay responds to Cosby's email requesting to meet with Public Health officials, providing Cosby with the direct-dial phone numbers to Hambley and others so she can set up a meeting directly, and answering another question.
 - 12/16/2022: Email from Stefanovsky to Cosby (p 148) cc Hambley, offering specific times that Hambley and Stefanovsky can meet with Cosby.
 - No response from Cosby.
 - 2/6/2023: Email from Hambley to entire Commission (p 150) following up with information requested at HHS Committee about accreditation process, and offering to meet.
 - 2/20/2023: Email from Hambley to Cosby, with Public Health Annual Report and follow-up information.
 - 3/23/2023: Email from Hambley to HHS Committee, including Cosby (p 151) inviting to attend The Poverty Education Workshop.
 - 4/5/2023: Email from Hambley to Rhodea and Cosby (p 153) asking if they wish to meet prior to HHS Committee, providing specific dates to meet, and updating on the Public Health accreditation process.

- Rhodea said she was unavailable; Cosby did not respond.
- 4/12/2023: Email from Hambley to Rhodea and Cosby (p 154) asking to provide a communicable disease update to HHS Committee.
- 5/18/2023: Email from Hambley to entire Commission (p 156 -157) providing links to Public Health accreditation documents.
 - Hambley also forwards to Cosby multiple Public Health budget emails sent originally to Gibbs since the requests to slash the budget started, so Cosby has those available (p 158-165).

8/25/2023 (Friday 3:53 pm): Gibbs Email directs Fiscal Services to implement a list of budget cuts (p 70), cc to Hambley. Gibbs directs Karen Karasinski, director of Fiscal, to work with Hambley's administrative assistant (Kris) and the Fiscal Services assistant director assigned to OCDPH (Nina)—excluding Hambley. Ms. Karasinski is on vacation during this time, but Gibbs requires her to work on this over the weekend and during her vacation.

o 8/28/2023 (Monday 5:46 pm): Hambley Email to Gibbs (p 101), providing additional information that he needs to keep in the background (14-page attachment addressing his requests point by point, including likely negative outcomes if this is the budget that is passed by the Board) (p 103-116), and noting that she is answering questions of Fiscal Services and attempting to assist Ms. Karasinski while she is working on this on her vacation.

- Hambley notes that Gibbs has still asked Fiscal Services to do the impossible—no one will be able to make the cuts he is demanding and still comply with state minimum requirements and other requirements.
- Page 1-2 of the attachment (p 103-104) includes a timeline of budget planning information distributed from January 2023 to present day, with references for what was asked and when.

o 8/28/2023 (Monday 6:45 pm): Hambley Email to Commissioners Bonnema and Zylstra (p 118), advising them about the current budget's reduction to the Title X program to the point where the County would lose Title X funding, and advising them that this would enable Planned Parenthood to pick up the Title X program and funding if the Board goes through with this.

 *Bonnema and Zylstra had asked for budget information to be forwarded to them directly, since they were not receiving it from Administration. 8/30/2023 (Wednesday): Hambley Email to Gibbs (p126), noting she has not heard from him, but she knows this budget work is happening with Fiscal Services. She attaches some additional information that she believes he needs, based on her conversations with Fiscal. No response from Gibbs.

8/30/2023 (Wednesday): Hambley Emails with Karasinski (Fiscal) (p 172) asking for a copy of the latest version of the Public Health budget, which Hambley has "heard" exists, and which Karasinski promises to share when done. Hambley also asks how the cuts are being determined, and advises Karasinski those could also create inability to meet minimum required service levels, which would also cause state intervention.

8/30/2023 (Wednesday): Hambley Press Release (p 173) on the budget process, and deficiencies at present which will cause state intervention if not remedied.

9/1/2023 (Friday): Gibbs Email (p 192) directing Hambley to appear at the Finance Committee meeting on 9/5, "as Chair Cosby will be giving an update on the FY24 Health Dept Budget."

9/1/2023 (Friday): Hambley Email to Gibbs (p 193), noting that Fiscal Services provided her the newest proposed changes to the Public Health budget, and asks that Gibbs let her know if there are other changes prior to the 9/5/2023 Finance Committee meeting.

No response from Gibbs.

9/1/2023 (Friday): Hambley Email to Cosby (p 194) noting she has the proposed changes to the Public Health budget but that she does not have the details yet.

- Hambley asks if Cosby would like to meet prior to the 9/5/2023 Finance meeting
 to talk about legal ramifications to the proposed budget changes, and Hambley
 noting that she hopes to have the full budget details soon so she can review and
 provide comments. Also includes a list of FTEs for Public Health, as Cosby
 requested.
- No response from Cosby.

9/4/2023 (Monday): Hambley Email to reschedule meeting on 9/6/2023 with Gibbs (p 198) to attend a necessary appointment for Hambley's relative's healthcare. No request from Gibbs to reschedule, although he acknowledged the email.

9/5/2023 (Tuesday): Finance Committee Meeting: In public comment, Hambley provides information on the budget since she has not been asked to present to the Board as the Health Officer, and talks about ramifications which would likely result in state intervention, as well as other negative outcomes.

- Karasinski provided her with the proposed changes to the budget on Friday 9/1/2023 after Hambley asked.
- Cosby requires Hambley to swear an oath and testify under oath under MCL 46.11(n) about public communications about the budget.

9/6/2023 (Wednesday): Hambley Email to Commissioner Miedema (p 199) providing requested information from Finance Committee on Miles of Smiles program (originally sent to all Commissioners on 6/19/2023). Miedema thank you email response.

9/8/2023 (Friday) Bonnema Email to all Commissioners (p 210) cc Hambley, Gibbs and Karasinski (Fiscal) urging them to put back Title X funding and avoid Planned Parenthood assumption of Title X funding, citing receipt of this information from Hambley.

9/8/2023 (Friday 7:10 pm): Email Gibbs to Hambley (p 211) asking her to provide "minimum required service level for each mandated line item of the Public Health budget, as well as documentation to support the number given."

- 9/9/2023 (Saturday): Email Hambley to Gibbs (p 212) asking when he needs this by, and noting that there is not a clear formula for minimum required service level and that her recall is that the original budget only asked for that necessary to meet minimum level, but that she will provide a further response.
- 9/9/2023 (Saturday): Hambley Email (p 213) to several Public Health program supervisors requesting available information to help answer the minimum required service level question.
- 9/11/2023 (Monday 7:37 am): Email from Deputy Director Mansaray (p 305) to Karasinski, asking if they are working from the most current Public Health budget to answer Gibbs' "minimum required service level" question, since Public Health is not certain that it has been given the most recent version of the budget.
 - Monday 9/11/2023 8:49 am Baranowski (Fiscal) Email response (p 306) with further explanation about the latest Public Health budget.
 - 9/11/2023 (Monday 10:59 am): Mansaray Email (p 312) to Public Health supervisors to communicate current budget status.
- 9/11/2023 (Monday 1:46 pm): Email Gibbs to Hambley (p 315) directing the information on "minimum required service level" for all Health Department programs be provided to him at earliest possible convenience "today."
- 9/11/2023 (Monday 5:39 pm): Email Hambley to Gibbs, cc Fiscal (p 318) attaching comprehensive document with available citations on minimum service level requirements by mandated program. (Explanations at p 319-508). Also forwarded to Cosby, Bonnema, and Zylstra.

9/12/2023 (Tuesday): Board of Commissioners meeting. In response to questions from Commissioner Bonnema at the 9/12/2023 Board of Commissioners meeting, Gibbs claimed to have regular communication with Hambley, said he saw her at least monthly, and had last talked with her 2-3 weeks prior. (Timestamp 4:29:19 – 4:30:32.) In fact, he has not spoken to her in person since August 4, 2023.

- 9/12/2023 (Tuesday): Cosby Email to Hambley (p 512) asking for "specific dollar amount" for each mandated program (in response to being forwarded the program requirements at p 318-508). "I want to be sure we are meeting all MDHHS requirements, not just the minimums."
- 9/15/2023 (Friday): Jordan Epperson Email to Hambley and others (p 513) wanting to know whether they intended to update HHS Committee and what they would present. Hambley responds on the same day with a summary of remarks (p 514-519).
- 9/18/2023 (Monday): Gibbs Email to Hambley (p 552) wanting Hambley to confirm that Title X grant will be maintained if the original amounts she requested for Title X programming are restored to the budget for Public Health.
 - Hambley responds the same day (p 523) and confirms that it will be, reiterating what she has told him previously re: Planned Parenthood.
- 9/18/2023 (Monday): Hambley Email to Gibbs and Cosby (p 526) outlining pitfalls for mandated programs in cutting another epidemiologist and in reducing by almost 50% the Nutrition/Health Education budget (p 527-533).
- 9/20/2023 (Wednesday 4:15 pm): Cosby Email to Hambley (p 535) wanting a response by Thursday morning for the Friday budget meeting, more than the 7 pages Hambley already provided. Cosby states please confirm why you believe the second epidemiologist has been cut, why three total are necessary, and what needs are not met in the total Public Health budget.
 - 9/21/2023 (Thursday): Hambley Email to Cosby, cc: Gibbs (p 536) advising that Fiscal Services told Hambley that Gibbs originally instructed that the second epidemiologist be cut, leaving only two since the first was cut due to an instruction to reject all COVID grants. Hambley explains why three epidemiologists are necessary. Then explains that Fiscal Services told Hambley that after the Tuesday committee meetings, Gibbs said that the second epidemiologist position did not have to be cut, but that no funding for the position would be restored to the budget. Hambley told Cosby that Hambley was continuing to look for ways to fund this epidemiologist without the General Fund contribution from the County. Hambley says she is still reviewing the budget version from Tuesday that Fiscal gave her. Hambley explains her concerns with

the cut to Nutrition/Health Education and the mandated programs under that line item.

- No further responses from Gibbs or Cosby.
- 9/26/2023 (Tuesday 9:36 am): Email Hambley to Gibbs (p 548) asking if the Board wants her to answer questions at that evening's Board meeting. Notes she has reviewed the budget in the meeting packet posted for the public, and reiterates her concerns that some remaining mandated programs will not be sufficiently funded.
 - No response from Gibbs.

9/26/2023 (Tuesday): Board of Commissioners' meeting

- Gibbs claims there is funding for a third epidemiologist. Prior to the meeting,
 Fiscal Services told Hambley and Public Health there was no funding for a third
 epidemiologist. Gibbs tells Commissioners that refusing COVID grant funds
 creates administrative savings from which a third epidemiologist will be funded.
 Fiscal confirms to Hambley during the meeting that this is not correct.
 - [Also, Gibbs never responded to Hambley's emails with concerns about this from 9/21/2023 if he believed there was funding for a third epidemiologist.]
- Gibbs claims there are no cuts to Nutrition/Health Education programs, even though that line item has been cut by 48%.