From: Morgan Allen

To: michael.c.kron@state.or.us
Cc: lsattenspiel@osba.org

Subject: RE: COSA comments on Public Records Draft

Date: Friday, August 26, 2016 2:37:30 PM

Hi Michael,

I wanted to take the opportunity to offer two brief comments on the Attorney General's proposed public records legislation dated 8/11/2016.

- 1. On page 3 of the draft, section 7(B): We would ask for consideration of inclusion of the words "or accrue" after "do not begin." The line would read: "...do not begin or accrue during periods..." The current language would still require the deadlines to be in effect if the request came in at the end of the day prior to holiday breaks. This would make the K-12 exemption more consistent with the higher education exemption in the bill which appears to stop the clock any time students are on break.
- 2. Per our earlier discussion, we are willing to work with your office on language in the bill that substantially addresses our concern about applicability of deadlines during periods when schools and districts are closed for breaks or have very limited staff due to student breaks. As drafted, the bill seems to have multiple deadline exemptions and we would be willing to work on more streamlined language that would be acceptable to all parties.

Thank you for the opportunity to comment. This has been a great example of a workgroup process that is open, accessible and offers stakeholders the opportunity to share their perspectives.

Best regards,

Morgan Allen
Deputy Executive Director of Policy and Advocacy
Confederation of Oregon School Administrators (COSA)
707 13th Street SE. Ste. 100

Salem, OR 97301-4035 Direct: 503-480-7221 Cell: 503-201-1864