#### **Oregon Public Records Law**

(Public Outreach 12)

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#### I. OREGON STATE PUBLIC RECORDS LAW

- Attorney General's Public Records and Meetings Manual (2014)
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- Citizen's Guide to Public Records and Meetings

### A. Attorney General's Public Records and Meetings Manual

Attorney General's Public Records and Meetings Manual Attorney General Ellen F. Rosenblum Oregon Department Of Justice November 2014 "Studies & Information" at http://www.hugoneighborhood.org/JSPSS\_Studies.htm

Rosenblum. Ellen F. Oregon Attorney General. November 2014. *Attorney General's Public Records and Meetings Manual*. State of Oregon, Department of Justice. Salem, OR.

"Knowledge will forever govern ignorance. And a people who mean to be their own governors, must arm themselves with the power knowledge gives. A popular government without popular information or the means of acquiring it, is but a prologue to a farce or a tragedy, or perhaps both." James Madison (1822)

**Introduction** In August of 1973, just after the enactment of Oregon's Public Records and Public Meetings Laws, the first Attorney General's Public Records and Meetings Manual was published. Since then, successive versions of the manual have striven to illuminate, for citizens and government bodies alike, the requirements of Oregon's laws related to public meetings and the disclosure of public records.

Put simply, these **laws establish a general expectation that Oregon's government will be transparent to its people.** (emphasis added) Government records are available to the public, and governing bodies **must conduct deliberations and make decisions in the open.** (emphasis added) This manual contains opinions of the Attorney General construing these requirements. Oregon's Attorneys General have long recognized that this **transparency is vital to a healthy democracy**. (emphasis added) Public scrutiny helps ensure that government spends tax dollars wisely and works for the benefit of the people.

The legislature has recognized exceptions to the general policy of openness. For example, the law protects the privacy of citizens whose confidential records are held by the government. And the law protects public safety by exempting from disclosure documents that would reveal security measures and investigatory documents that could compromise criminal investigations if disclosed. One purpose of this manual is to identify the general exceptions that, in the legislature's judgment, sometimes justify withholding information from the public. For more than four decades, the office of the Attorney General has striven to **faithfully interpret the Public Records and Public Meetings Laws in a manner consistent with the fundamental premise underlying them. This means ambiguities in the law generally should be resolved in favor of the public's right to information. (emphasis added) When public bodies do have the authority to exclude the public from some types of discussions, or withhold certain records from public view, that <b>authority is an exception to the general rule of openness**.

(emphasis added) The scope of such an exception must be interpreted narrowly in order to preserve to Oregonians the power to understand and oversee the activities of their government.

#### B. Attorney General's Public Records and Meetings Manual 2014 - I. Public Records

Attorney General's Public Records and Meetings Manual 2014 - I. Public Records Attorney General Ellen F. Rosenblum Oregon Department Of Justice 2014 http://www.doj.state.or.us/public records/manual/public records.shtml

Under ORS 192.420 "every person" has a **right to inspect any nonexempt public record of a public body in Oregon**. (emphasis added) This right extends to any natural person, any corporation, partnership, firm or association, and any member or committee of the Legislative Assembly. ORS 192.410(2). The definition of "person" in ORS 192.410(2) does not mention a "public body," and we have concluded that a public body may not use the Public Records Law to obtain public records from another public body. Similarly, a public official, other than a legislator, acting within his or her official capacity may not rely on the Public Records Law to obtain records, although the individual could do so in his or her individual capacity.

#### I.D.4. Proper and Reasonable Opportunity to Inspect

**ORS 192.430** requires a custodian of public records to provide "proper and reasonable opportunities for inspection and examination of the records in the office of the custodian" during usual business hours to persons seeking access to public records. (emphasis added) See p. B-9 for Helpful Hints for Responding to Public Records Requests. The public is entitled to inspect nonexempt records as promptly as a public body reasonably can make them available. How quickly a public body reasonably can make nonexempt records available will depend on factors like the specificity of the request, the volume of records requested, staff available to respond to the records request, and the difficulty of determining whether any of the records are exempt from disclosure. In the usual case, we think that it should be possible to make requested records available within ten working days. We recognize that in some cases more time – even significantly more time – may be required.

The custodian's duty to provide reasonable opportunities for inspection of records applies to records "maintained in machine readable or electronic form." ORS 192.430(1). (emphasis added) The law also requires the custodian to provide persons inspecting records with "reasonable facilities" for making memoranda or abstracts from the records. In short, the law directs public bodies to take reasonable steps to accommodate members of the public while they inspect public records.

#### I.D.5. Copying

A person may require the public body to provide a copy of a requested record if the record is susceptible to copying.[42]ORS 192.440(1) also **requires public bodies to furnish "reasonable opportunity to inspect** or copy" public records. This duty includes allowing requesters to use their own equipment to make copies, subject to reasonable restrictions imposed by the public body to protect the integrity of the records and to prevent interference with the regular duties of the public body. A **person requesting a record generally can choose between receiving a copy of the record provided by the custodian, physically inspecting the record, or making a copy of the record using the requester's own equipment at the custodian's place of business.[43] (emphasis added)** 

#### Footnotes

[42] The Public Records Law does not require a custodian of a public record to furnish a certified copy of the record on demand. ORS 192.440(1). Public bodies may, however, continue to offer certification as a courtesy to requesters. Certification is not difficult and may be included as a statement on the cover sheet or last sheet of the copy. See p. B-6 for a sample certification. Copies of electronic records are more readily susceptible to being modified after a certified copy has been provided by the public body than are hard copies of records. In certifying an electronic record, the custodian may state that the copy provided in electronic form on a specified date is a true and correct copy of the original, but that the custodian cannot ensure that the electronic record will not be modified after its release from the custody of the custodian. See p. B-6 for a sample certification.

[43] 39 Op Atty Gen 721 (1979) (see App E).39 A county may not refuse to allow a person to use the person's own equipment to copy maps which are public records, and may not decline to make available a duplicate copy of a magnetic tape containing public records, subject to reasonable rules and regulations for protection of the records and to prevent interference with county business. A home-rule county may not charge a fee exceeding the actual cost of making a record available.

#### Appendices

Attorney General's Public Records and Meetings Manual 2014 - Public Records Law Appendix E http://www.doj.state.or.us/public\_records/manual/pages/public\_records\_e.aspx

#### C. Public Records and Meetings Law

Public Records and Meetings Law Attorney General Ellen F. Rosenblum Oregon Department Of Justice http://www.doj.state.or.us/public\_records/pages/index.aspx Downloaded February 8, 2016

Oregon's open government laws promote democracy by ensuring that all state, regional and local governments conduct their business with transparency. Oregon citizens have a right to know how their government is spending their tax dollars and exercising the powers granted by the people. This page is a resource for all Oregonians to understand and exercise their right to access their government.

#### D. Citizen's Guide to Public Records and Meetings

Citizen's Guide to Public Records and Meetings Attorney General Ellen F. Rosenblum Oregon Department Of Justice http://www.doj.state.or.us/public\_records/pages/citizens\_guide.aspx Downloaded February 8, 2016

Oregon's open government laws promote democracy by ensuring that all state, regional and local governments conduct their business with transparency. Oregon citizens have a right to know how their government is spending their tax dollars and exercising the powers granted by the people. The public performs a vital watchdog role by invoking the Public Records and Public Meetings Laws to seek and disseminate information about how the government is functioning.

#### II. OREGON INSPECTION OF PUBLIC RECORDS LAW

#### **Oregon Inspection Of Public Records Law**

Chapter 192 Records; Public Reports and Meetings OregonLaws.org http://www.oregonlaws.org/ors/chapter/192 Downloaded February 8, 2016

#### ORS 192.410 Definitions for ORS 192.410 to 192.505

- ORS 192.420 Right to inspect public records
- ORS 192.423 Condensation of public record subject to disclosure
- ORS 192.430 Functions of custodian of public records
- ORS 192.440 Copies or inspection of public records
- ORS 192.445 Nondisclosure on request of home address, home telephone number and electronic mail address
- ORS 192.447 Nondisclosure of public employee identification badge or card
- ORS 192.448 Nondisclosure of concealed handgun license records or information

#### A. ORS 192.015. Secretary of State as public records administrator

The Secretary of State is the public records administrator of this state, and it is the responsibility of the secretary to obtain and maintain uniformity in the application, operation and interpretation of the public records laws. [1973 c.439 §2]

#### B. ORS 192.420<sup>1</sup> Right to inspect public records; notice to public body attorney

# (1) Every person has a right to inspect any public record of a public body in this state, except as otherwise expressly provided by ORS 192.501 (emphasis added) (Public records conditionally exempt from disclosure) to 192.505 (Exempt and nonexempt public record to be separated).

(2)(a) If a person who is a party to a civil judicial proceeding to which a public body is a party, or who has filed a notice under ORS 30.275 (Notice of claim) (5)(a), asks to inspect or to receive a copy of a public record that the person knows relates to the proceeding or notice, the person must submit the request in writing to the custodian and, at the same time, to the attorney for the public body.

(b) For purposes of this subsection:

(A) The attorney for a state agency is the Attorney General in Salem.

(B) Person includes a representative or agent of the person. [1973 c.794 §3; 1999 c.574 §1; 2003 c.403 §1]

Annotations/Related See also annotations under ORS 192.010 and 240.120 in permanent edition.

**Notes of Decisions** This statute creates right of access to public records that is not dependent on the requestors need or motivation; a public body may not refuse to produce records subject to inspection under this section just because requestor already possesses them; and plaintiffs possession of the records does not justify trial courts refusal to declare the records public and subject to disclosure. Smith v. School District No. 45, 63 Or App 685, 666 P2d 1345 (1983), Sup Ct review denied

The public interest in disclosure of public records was not satisfied by disclosure of summarizing document, regardless of whether summary satisfied individual need of requesting party. Coos County v. Ore. Dept. of Fish and Wildlife, 86 Or App 168, 739 P2d 47 (1987), Sup Ct review denied

Attorney General Opinions Background materials concerning agenda matters for city and county governing bodies as public records, (1978) Vol 38, p 1761

§§ 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated)

**Notes of Decisions** Failure of legislature to include reference to courts and court records such as those particularly named in ORS 192.005 (Definitions for ORS 192.005 to 192.170) tells against application of these sections to courts. State ex rel KOIN-TV v. Olsen, 300 Or 392, 711 P2d 966 (1985)

School districts blanket policy exempting public records from disclosure without individualized showing, violates public records law and is therefore unenforceable. Guard Publishing Co. v. Lane County School Dist., 310 Or 32, 791 P2d 854 (1990)

Attorney General Opinions Financial statements of hospitals as public records, (1974) Vol 36, p 893; criminal records subject to Public Records Law, (1974) Vol 37, p 126; power of county to refuse the right to copy maps, which are public records, with an individuals own equipment and to refuse to supply magnetic tape containing public records, (1979) Vol 39, p 721; Oregon Medical Insurance Pool is fundamentally private-sector body, under virtually total private control, created by state to fulfill public purpose and is not state agency or public body subject to Public Records Law, (1989) Vol 46, p 155; applicability to prison work program records, (1996) Vol 48, p 134; disclosure of personal information obtained from motor vehicle records, (1998) Vol 49, p 127

Law Review Citations 53 OLR 354-363 (1974); 55 OLR 354-359 (1976); 56 OLR 387 (1977)

#### Chapter 192/Atty. Gen. Opinions

Attorney Generals Public Meetings and Records Manual, (1973) Vol 36, p 543; public meetings and records manual, (1976) Vol 37, p 1087; prohibition on disclosing marriage records, (1998) Vol 49, p 21

1. Legislative Counsel Committee, CHAPTER 192—Records; Public Reports and Meetings, https://www.-oregonlegislature.-gov/-bills\_laws/-lawsstatutes/-2013ors192.-html External\_link\_icon(2013) (last accessed Apr. 27, 2014).

#### C. ORS 192.423<sup>1</sup> Condensation of public record subject to disclosure

• petition to review denial of right to inspect public record

adequacy of condensation

(1) When a public record is subject to disclosure under ORS 192.502 (Other public records exempt from disclosure) (9)(b), in lieu of making the public record available for inspection by providing a copy of the record, the public body may prepare and release a condensation from the record of the significant facts that are not otherwise exempt from disclosure under ORS 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated). The release of the condensation does not waive any privilege under ORS 40.225 (Rule 503. Lawyer-client privilege) to 40.295 (Rule 514. Effect on existing privileges).

(2) The person seeking to inspect or receive a copy of any public record for which a condensation of facts has been provided under this section may petition for review of the denial to inspect or receive a copy of the records under ORS 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated). In such a review, the Attorney General, district attorney or court shall, in addition to reviewing the records to which access was denied, compare those records to the condensation to determine whether the condensation adequately describes the significant facts contained in the records. [2007 c.513 §2]

Note: 192.423 (Condensation of public record subject to disclosure) was added to and made a part of 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated) by legislative action but was not added to any smaller series therein. See Preface to Oregon Revised Statutes for further explanation.

**Annotations/Related** §§ 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated)

**Notes of Decisions** Failure of legislature to include reference to courts and court records such as those particularly named in ORS 192.005 (Definitions for ORS 192.005 to 192.170) tells against applica-tion of these sec-tions to courts. State ex rel KOIN-TV v. Olsen, 300 Or 392, 711 P2d 966 (1985)

School districts blanket policy exempting public records from disclosure without individualized showing, violates public records law and is therefore unenforceable. Guard Publishing Co. v. Lane County School Dist., 310 Or 32, 791 P2d 854 (1990)

**Atty. Gen. Opinions** Financial statements of hospitals as public records, (1974) Vol 36, p 893; criminal records subject to Public Records Law, (1974) Vol 37, p 126; power of county to refuse the right to copy maps, which are public records, with an individuals own equipment and to refuse to supply magnetic tape containing public records, (1979) Vol 39, p 721; Oregon Medical Insurance Pool is fundamentally private-sector body, under virtually total private control, created by state to fulfill public purpose and is not state agency or public body subject to Public Records Law, (1989) Vol 46, p 155; applicability to prison work program records, (1996) Vol 48, p 134; disclosure of personal information obtained from motor vehicle records, (1998) Vol 49, p 127

Law Review Citations 53 OLR 354-363 (1974); 55 OLR 354-359 (1976); 56 OLR 387 (1977)

**Chapter 192/Atty. Gen. Opinions** Attorney Generals Public Meetings and Records Manual, (1973) Vol 36, p 543; public meetings and records manual, (1976) Vol 37, p 1087; prohibition on disclosing marriage records, (1998) Vol 49, p 21

1. Legislative Counsel Committee, CHAPTER 192—Records; Public Reports and Meetings, https://www.-oregonlegislature.-gov/-bills\_laws/-lawsstatutes/-2013ors192.-html External\_link\_icon(2013) (last accessed Apr. 27, 2014).

#### D. ORS 192.430<sup>1</sup> Functions of custodian of public records

• rules

(1) The custodian of any public records, including public records maintained in machine readable or electronic form, unless otherwise expressly provided by statute, shall furnish proper and reasonable opportunities for inspection and examination of the records in the office of the custodian and reasonable facilities for making memoranda or abstracts therefrom, during the usual business hours, to all persons having occasion to make examination of them. If the public record is maintained in machine readable or electronic form, the custodian shall furnish proper and reasonable opportunity to assure access.

(2) The custodian of the records may adopt reasonable rules necessary for the protection of the records and to prevent interference with the regular discharge of duties of the custodian. [1973 c.794 §4; 1989 c.546 §1]

**Annotations/Related** See also annotations under ORS 192.030 to 192.430 (Functions of custodian of public records) and ORS 240.120 in permanent edition.

Atty. Gen. Opinions Public Welfare Division records showing cost of medical services to welfare recipients as public records, (1972) Vol 35, p 1143

§§ 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated)

**Notes of Decisions** Failure of legislature to include reference to courts and court records such as those particularly named in ORS 192.005 (Definitions for ORS 192.005 to 192.170) tells against application of these sections to courts. State ex rel KOIN-TV v. Olsen, 300 Or 392, 711 P2d 966 (1985)

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**Atty. Gen. Opinions** Financial statements of hospitals as public records, (1974) Vol 36, p 893; criminal records subject to Public Records Law, (1974) Vol 37, p 126; power of county to refuse the right to copy maps, which are public records, with an individuals own equip-ment and to refuse to supply magnetic tape containing public records, (1979) Vol 39, p 721; Oregon Medical Insurance Pool is fundamentally private-sector body, under virtually total private control, created by state to fulfill public purpose and is not state agency or public body subject to Public Records Law, (1989) Vol 46, p 155; applicability to prison work program records, (1996) Vol 48, p 134; disclosure of personal information obtained from motor vehicle records, (1998) Vol 49, p 127

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1. Legislative Counsel Committee, CHAPTER 192—Records; Public Reports and Meetings, https://www.-oregonlegislature.-gov/-bills\_laws/-lawsstatutes/-2013ors192.-html External\_link\_icon(2013) (last accessed Apr. 27, 2014).

#### E. ORS 192.440<sup>1</sup> Copies or inspection of public records

- written response by public body
- fees
- waiver or reduction
- procedure for records requests

(1) The custodian of any public record that a person has a right to inspect shall give the person, upon request:

(a) A copy of the public record if the public record is of a nature permitting copying; or

(b) A reasonable opportunity to inspect or copy the public record (emphasis added).

(2) If a person makes a written request to inspect a public record or to receive a copy of a public record, the public body receiving the request shall respond as soon as practicable and without unreasonable delay. The public body may request additional information or clarification from the requester for the purpose of expediting the public bodys response to the request. The response of the public body must acknowledge receipt of the request and must include one of the following:

(a) A statement that the public body does not possess, or is not the custodian of, the public record.

(b) Copies of all requested public records for which the public body does not claim an exemption from disclosure under ORS 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated).

(c) A statement that the public body is the custodian of at least some of the requested public records, an estimate of the time the public body requires before the public records may be inspected or copies of the records will be provided and an estimate of the fees that the requester must pay under subsection (4) of this section as a condition of receiving the public records.

(d) A statement that the public body is the custodian of at least some of the requested public records and that an estimate of the time and fees for disclosure of the public records will be provided by the public body within a reasonable time.

(e) A statement that the public body is uncertain whether the public body possesses the public record and that the public body will search for the record and make an appropriate response as soon as practicable.

(f) A statement that state or federal law prohibits the public body from acknowledging whether the record exists or that acknowledging whether the record exists would result in the loss of federal benefits or other sanction. A

statement under this paragraph must include a citation to the state or federal law relied upon by the public body. (3) If the public record is maintained in a machine readable or electronic form, the custodian shall provide a copy of the public record in the form requested, if available. If the public record is not available in the form requested, the

custodian shall make the public record available in the form in which the custodian maintains the public record. (4)(a) The public body may establish fees reasonably calculated to reimburse the public body for the public body's actual cost (emphasis added) of making public records available, including costs for summarizing, compiling or tailoring the public records, either in organization or media, to meet the persons request. (b) The public body may include in a fee established under paragraph (a) of this subsection the cost of time spent by an attorney for the public body in reviewing the public records, redacting material from the public records or segregating the public records into exempt and nonexempt records. The public body may not include in a fee established under paragraph (a) of this subsection the cost of time spent by an attorney for the public body in determining the application of the provisions of ORS 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated).

(c) The public body may not establish a fee greater than \$25 under this section unless the public body first provides the requestor with a written notification of the estimated amount of the fee and the requestor confirms that the requestor wants the public body to proceed with making the public record available.

(d) Notwithstanding paragraphs (a) to (c) of this subsection, when the public records are those filed with the Secretary of State under ORS chapter 79 or ORS 80.100 (Definitions for ORS 80.100 to 80.130) to 80.130 (Place to register as buyer of farm product, commission merchant or selling agent), the fees for furnishing copies, summaries or compilations of the public records are those established by the Secretary of State by rule, under ORS chapter 79 or ORS 80.100 (Definitions for ORS 80.100 to 80.130) to 80.130) to 80.130 (Place to register as buyer of farm product, commission merchant or selling agent).

(5) The custodian of any public record may furnish copies without charge or at a substantially reduced fee if the custodian determines that the waiver or reduction of fees is in the public interest because making the record available primarily benefits the general public.

(6) A person who believes that there has been an unreasonable denial of a fee waiver or fee reduction may petition the Attorney General or the district attorney in the same manner as a person petitions when inspection of a public record is denied under ORS 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated). The Attorney General, the district attorney and the court have the same authority in instances when a fee waiver or reduction is denied as it has when inspection of a public record is denied.

(7) A public body shall make available to the public a written procedure for making public record requests that includes:

(a) The name of one or more persons to whom public record requests may be sent, with addresses; and

(b) The amounts of and the manner of calculating fees that the public body charges for responding to requests for public records.

(8) This section does not apply to signatures of individuals submitted under ORS chapter 247 for purposes of registering to vote as provided in ORS 247.973 (Status of signature on voter registration card as public record). [1973 c.794 §5; 1979 c.548 §4; 1989 c.111 §12; 1989 c.377 §2; 1989 c.546 §2; 1999 c.824 §5; 2001 c.445 §168; 2005 c.272 §1; 2007 c.467 §1]

Annotations/Related See also annotations under ORS 192.020 in permanent edition.

**Notes of Decisions** Although fees charged by public body to provide edited copies of public records were authorized by city ordinance, public body failed to carry its burden under this provision to show that fees charged were reasonably related to its actual costs, when it provided no evidence to determine its actual costs. Davis v. Walker, 108 Or App 128, 814 P2d 547 (1991)

Public body could not require payment of copying fee where records were not made available for examination without copying. U.S. v. Van Horn, 156 FRD 231 (D. Or. 1994)

Public body's decision whether to grant or deny fee waiver or reduction must be objectively reasonable under totality of circumstances. In Defense of Animals v. OHSU, 199 Or App 160, 112 P3d 336 (2005)

Atty. Gen. Opinions Home-rule county may not charge fee in excess of actual cost incurred in making public record available, (1979) Vol 39, p 721

§§ 192.410 (Definitions for ORS 192.410 to 192.505) to 192.505 (Exempt and nonexempt public record to be separated)

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Law Review Citations 53 OLR 354-363 (1974); 55 OLR 354-359 (1976); 56 OLR 387 (1977)

**Chapter 192/Atty. Gen. Opinions** Attorney Generals Public Meetings and Records Manual, (1973) Vol 36, p 543; public meetings and records manual, (1976) Vol 37, p 1087; prohibition on disclosing marriage records, (1998) Vol 49, p 21

Under ORS 192.440(4)(a) a fee "reasonably calculated to reimburse" the public body for its actual cost in making the records available may be charged. No more than the actual cost may be charged by a public body. 39 Op. Atty Gen. 721 (1979). In Defense of *Animals v. OHSU*, 199 Or. App. 160, 112 P.3d 336 (2005). The records custodian has the burden of demonstrating the reasonableness of charges for "actual costs" and must do so with specific supporting data. If such data is absent, the charges are per se not reasonable. In *Defense of Animals; Davis v. Walker*, 108 Or. App. 128, 814 P.2d 547 (1991). If the fee will exceed \$25, a public body must first provide an estimate of the fee and confirm that the requester wants to proceed. ORS 192.440(4)(c).

1. Legislative Counsel Committee, CHAPTER 192—Records; Public Reports and Meetings, https://www.-oregonlegislature.-gov/-bills\_laws/-lawsstatutes/-2013ors192.-html External\_link\_icon(2013) (last accessed Apr. 27, 2014).

## F. ORS 192.445. Nondisclosure on request of home address, home telephone number and electronic mail address

- rules of procedure
- duration of effect of request
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- when not applicable

#### G. ORS 192.447. Nondisclosure of public employee identification badge or card

#### H. ORS 192.448. Nondisclosure of concealed handgun license records or information

- exceptions
- limitations
- rules

C/Users/Mike/Documents/AAA Applications/Hugo\_Neighborhood\_Association/Community\_Issues/UO CO Public Safety Services 2015/Communicatrions/StateholderLettersOnStudyDesign/UO CO Public Health/USPSS\_12\_OR PublicRecondsLawBy W 020916.mpd