



OREGON DEPARTMENT OF CORRECTIONS RULEMAKING PUBLIC COMMENTS AND AGENCY RESPONSE Summary Memo

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Summary Memo

No changes have been made to OAR 291-139 Legal Affairs (AIC) resulting from public comments.

Comments by Topic and Agency Response

The public comment period was open from February 4, 2026 to March 25, 2026. The department received four total comments in writing during the public comment period. Two of these comments were received via the kyte system, and two of the comments were received via USPS.

Comments are presented below in no particular order. A copy of comments that were received via PDF are attached at the end of the document.

Comment:

The comments that were received can be summarized under the following headings:

Access to Legal Resources: One comment has specifically requested more access to legal resources, including but not limited to paralegal courses, more family law resources, and more resources on domestic violence, drug addiction, and women's rights.

Network Storage: Multiple comments state concerns of confidentiality related to network storage, specifically breach of attorney client privilege as well as concerns over data being subject to public records requests. There are additional comments that state concern over the theoretical use of AI tools to monitor data stored on network storage.

Letters to AG: One comment requests that the additions to OAR 291-139-0120 be expanded to include letters to the Ombudsman.

Agency Response:

Access to Legal Resources: This comment does not address changes made.

Network Storage: Correspondence with attorneys is not permitted to be stored on assigned network storage space just as it was not permitted to be stored on a removable media device. Data stored on network storage is subject to the same periodic audits as the data stored on removable media devices, however, all access to stored data is tracked to ensure accountability and transparency. At this time, there are no AI tools being utilized to monitor documents stored on network storage.

Letters to AG: The Ombudsman is not a court or paroling authority, and the purpose of the Law Libraries is to provide reasonable access to courts and by extension the paroling authority.