Public Records Appeal - Swansea Public Schools (October 13, 2026)

Dear Supervisor Arthur and Public Records Division:

Pursuant to G.L. c. 66, § 10A(a) and 950 C.M.R. 32.08(1), I appeal Swansea Public Schools' October 6, 2026 $500 fee estimate and its October 13, 2026 revised $325 estimate for my September 23, 2026 public records request, as narrowed on October 6. I respectfully ask the Supervisor to review the entire correspondence record appended below, with its message headers. I am copying Superintendent/Records Access Officer Scott Holcomb.

The request concerns electronic copies of final written agreements resolving student-related educational disputes, with protected student information redacted. It excludes personnel, employment, ordinary vendor, and commercial matters. My original request expressly sought noncommercial public-interest fee relief and electronic production. In response to Swansea's $500 estimate (20 hours), I voluntarily agreed to narrow the timeframe to the endpoint of Swansea's prior Boston Globe collection/production period in 2023 through the present, while retaining final general- and special-education student-dispute agreements. Swansea acknowledged this modification and reduced the estimated hours to 13, or $325.

I appreciate Swansea's communication and its $175 reduction. I do not dispute that genuine FERPA or other legally required student-identifying redactions may be chargeable, nor do I contend that Swansea's sub-20,000 population requires it to furnish the first two hours free. My objection is that its revised estimate has not yet demonstrated that EACH estimated hour is reasonably necessary and legally chargeable for the actual narrowed request. G.L. c. 66, § 10(b)(viii), (d)(iii)-(v); 950 C.M.R. 32.07.

1.

NO RECORD OR PAGE COUNT; NO TESTABLE TIME BASIS. Swansea identifies no number of responsive or potentially responsive agreements, no number of pages, no typical length, and no minutes-per-page or minutes-per-document assumptions. Without those facts, the proposed two hours to review legally protected information and three additional hours for legally required segregation and redaction ($125 combined) cannot be evaluated. The reduction from nine such hours to five does not cure the absence of a workload basis. If a definitive count is not yet known, Swansea should explain how its preliminary figures were developed and provide the presently known volumes or reasonable preliminary ranges.
2.

THE NARROWED START DATE REMAINS UNRESOLVED. In its latest response, the District says it will use the cutoff from its prior Boston Globe production "once that date is confirmed." That starting point is a material component of workload. The District has nonetheless stated a precise 13-hour charge. Please direct it to identify the cutoff actually used and explain the number and location of records expected within the resulting period; otherwise this is not yet a reliably scoped estimate.
3.

IDENTIFICATION, SEARCH, AND DUPLICATE REVIEW NEED SUPPORT. The revised estimate charges one hour to identify sources/set parameters, three hours to search/retrieve, and three hours to identify responsive records/eliminate duplicates: seven hours and $175 before student-information review. Swansea has not identified which custodians and systems will be searched, why the final signed agreements cannot be located through existing centralized legal, superintendent, special education, BSEA, or records-management files, what search methodology is contemplated, or why three hours of responsiveness/deduplication are necessary for already-final agreements. These are questions requiring substantiation, not assumptions that the work can be done instantly.
4.

DISTINGUISH MANDATORY REDACTION FROM UNCHARGEABLE OR REPEATED REVIEW.
FERPA, the Massachusetts student-record requirements, and Champa v. Weston Public Schools, 473 Mass. 86 (2015), may justify protection of student-identifying information while permitting disclosure of segregable substantive agreement terms. However, G.L. c. 66, § 10(d)(iii) and 950 C.M.R. 32.07 prohibit fees for segregation or redaction not required by law unless properly approved. Please require Swansea to specify the protected-information categories and legal authority for time charged, explain the review/redaction allocation by volume, and eliminate double counting across responsiveness review, confidentiality review, redaction, and final quality control.
5.

ONE HOUR OF FINAL QUALITY CONTROL/ELECTRONIC PRODUCTION ($25) IS NOT SELF-JUSTIFYING. The District should identify what distinct, legally chargeable tasks remain after the two hours of student-information review and three hours of redaction, whether the final review merely repeats work already counted, and what time is attributable to ordinary administrative forwarding or digital delivery. Swansea correctly assigns $0 to electronic reproduction itself, and I do not seek a paper copy.
6.

THE HOURLY RATE REQUIRES A TASK-SPECIFIC BASIS. I recognize that $25 is a statutory ceiling, not a universally required rate. The District states that it does not exceed the rate of the lowest-paid capable employee, but identifies no position/classification or actual applicable hourly rate for each task. Please require identification of the lowest-paid employee classification reasonably capable of each chargeable operation and the basis for applying $25 throughout, without requesting any person's private payroll information.
7.

FEE WAIVER / REDUCTION. My original request invoked G.L. c. 66, § 10(d)(v). The project is noncommercial and intended to disseminate public information about the expenditure of district resources, resolution of student disputes, and the practical effect of settlement terms statewide. Swansea has not explained whether or how it considered that public-interest request. I recognize that the Supervisor cannot compel a discretionary waiver. I request that the District expressly consider and respond to it and, if a lawful fee remains, consider reduction or rolling production of already-located agreements.

RECENT DIRECTLY RELEVANT DETERMINATIONS. In SPR26/4024 (Dracut Public Schools, October 9, 2026), involving my substantially similar settlement agreement request, the Supervisor directed a more substantiated estimate, including search hours, pages, minutes per page, the legal basis for redaction, and explanation of supervisory verification work. In SPR26/4062 (Weymouth Public Schools, October 13, 2026), again involving my substantially similar request, the Supervisor required a record/page workload foundation and specific explanations for search and final delivery work, and held that redaction under discretionary Exemption ©, without approval, could not be charged. Both determinations are attached. I do not claim that Swansea's student-identifying redactions are categorically analogous to Weymouth's Exemption © redactions; the relevant principles are demonstrable workload, genuinely mandatory redactions, avoidance of unsupported review time, and task-specific reasonableness.

REQUESTED RELIEF. I respectfully ask the Supervisor to (a) find that the current $325 estimate requires a revised, factually supported explanation consistent with G.L. c. 66, § 10(d) and 950 C.M.R. 32.07; (b) request the actual narrowed cutoff, expected document/page volumes and per-document/per-page work estimates; © distinguish permissible tasks and legally mandatory redactions from duplicative, discretionary or unexplained work, including the hourly-rate basis; (d) direct a response identifying any reasonable means to produce existing readily available nonexempt records affordably and the anticipated production date; and (e) request

Swansea's express consideration of my statutory public-interest waiver/reduction application. I request a determination without treating my willingness to narrow the request as a concession that either fee estimate was valid.

The correspondence below contains the complete unique message text of the five-email Swansea request/response chain, chronologically, and its essential email headers. The October 6 email refers to two third-party example agreements I had shared with Swansea; those separate agreements are deliberately NOT enclosed with this appeal because the dispute concerns Swansea's fee methodology, not those third-party records. The appendices are the correspondence and the two cited SPR determinations.

Thank you for your consideration.

Joey Ford
Founder and Leader, Parent Data Force
joey@parentdataforce.com

---- APPENDIX A: SWANSEA REQUEST AND COMPLETE CORRESPONDENCE ----
Original and subsequent messages are reproduced once each, without redundant reply-chain quotations. Sender, recipients, cc, date, subject, and Gmail source message IDs are included. Original files attached to one intermediate message are not reattached here.

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MESSAGE 1 of 5
From: Parent Data Force Joey@parentdataforce.com
To: scott.holcomb@swanseaschools.org
Cc: ewhite@swanseaschools.org
Date (as indexed by Gmail): 2026-09-23T17:09:44
Subject: Swansea Public Schools — Massachusetts Public Records Request — Student Settlement Agreements, MOUs, MOAs & Resolution Agreements (Sept. 18, 2021–Present)
Gmail message ID: 1a0cf3ea54573a46
Original body:
Dear Superintendent Holcomb / Records Access Officer:

Pursuant to the Massachusetts Public Records Law, G.L. c. 66, § 10, and 950 C.M.R. 32.00, I request electronic copies of the following records maintained by Swansea Public Schools.

TIME PERIOD

This request covers records entered into, executed, finalized, materially amended, or extended from September 18, 2021 through the date of your response.

RECORDS REQUESTED

Please provide all final or executed student-related agreements resolving, compromising, settling, memorializing, or otherwise disposing of a dispute, claim, complaint, appeal, due-process matter, grievance, or other contested educational issue involving Swansea Public Schools, including:

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Settlement agreements and settlement-and-release agreements;
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Resolution agreements;
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Memoranda of Understanding (MOUs);
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Memoranda of Agreement (MOAs);
-

Mediation agreements;
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Stipulations, consent agreements, or agreements for judgment/resolution;
-

Side agreements, side letters, or similar written agreements;
-

Amendments, addenda, extensions, or attachments that materially alter or form part of such agreements; and
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Any other final written agreement, regardless of title, that resolves or memorializes the resolution of a student-related educational dispute.

This includes agreements involving SPECIAL EDUCATION matters, including but not limited to IDEA/G.L. c. 71B, BSEA matters, Section 504, ADA-related educational access, evaluations, eligibility, placement, services,

accommodations, compensatory education, tuition or reimbursement, transportation, extended-school-year services, or other special-education rights or services.

It also includes agreements involving GENERAL EDUCATION students or student matters, including, where applicable, student discipline or exclusion, access to educational programming, bullying/harassment or discrimination complaints, civil-rights complaints, educational services, enrollment, or other student-related disputes resolved through a written agreement.

This request is limited to STUDENT/EDUCATION matters.

EXPRESS EXCLUSION — NO STAFF OR EMPLOYMENT RECORDS

I am not requesting any agreement whose subject is a District employee, former employee, applicant, administrator, teacher, staff member, bargaining unit, or employment relationship. Please exclude collective-bargaining agreements, employee grievances, personnel settlements, employment discrimination matters, separation agreements, staff discipline matters, workers' compensation matters, and other employee/labor agreements.

I am likewise not seeking ordinary vendor, procurement, construction, property, or commercial settlements unrelated to student educational matters.

EXISTING LISTS OR INDEXES

If the District already maintains an existing log, index, spreadsheet, database export, or other existing record identifying responsive student-related agreements during this period, please include that existing record as well, with student PII redacted as necessary. I am not asking the District to create a new index or summary.

NO STUDENT PII REQUESTED

I am expressly NOT requesting personally identifiable student information.

The District may redact student names, parent/guardian names where identifying, addresses, contact information, student identification numbers, dates of birth, and any other direct or indirect identifier that must be removed under FERPA, Massachusetts student-record law, or another applicable law.

For special-education settlement agreements in particular, Champa v. Weston Public Schools, 473 Mass. 86 (2015), establishes that the presence of protected student information does not permit categorical withholding of the entire agreement. Personally identifiable information may be redacted, but segregable non-exempt portions are subject to disclosure.

The Supervisor of Records subsequently applied Champa in SPR17/661, Alexander v. Wellesley Public Schools (May 25, 2017), rejecting the argument that Champa was limited only to out-of-district settlement agreements and finding that the school had not met its burden to establish that in-district special-education settlement agreements could be withheld in their entirety.

DESE has also reiterated publicly that, in Massachusetts, settlement agreements between school districts and parents of students eligible for special education are public records once all personally identifiable information has been removed.

Accordingly, please do not withhold an entire responsive agreement merely because it contains some protected information, a confidentiality provision, or student-record material. Please redact only the information that is lawfully exempt and produce all reasonably segregable non-exempt portions.

If the District contends that any responsive agreement must be withheld in its entirety, please identify the record or category of records, the specific statutory exemption or privilege relied upon, and the factual basis explaining why redaction or segregation cannot permit disclosure of any portion, as required by G.L. c. 66, § 10(b)(iv).

ELECTRONIC PRODUCTION

Please provide all records electronically.

For agreements maintained as electronic documents or PDFs, please provide searchable electronic copies where available rather than printing and rescanning them. Native electronic format is welcome where practical. Please transmit records by email, shared download link, or another electronic delivery method.

No paper copies are requested, and I do not authorize costs associated solely with printing electronically maintained records.

ROLLING PRODUCTION

If responsive records can be produced in batches, please provide them on a rolling basis rather than delaying production of readily available records until the entire request has been completed.

FEES / PUBLIC INTEREST

This request is noncommercial and is intended to contribute to public understanding of the District's use of public funds and its resolution of student-related educational disputes. I therefore request waiver or reduction of any permissible fees under G.L. c. 66, § 10(d)(v).

If the District anticipates any fee, please provide the written, itemized, good-faith estimate required by G.L. c. 66, § 10(b)(viii), identifying the actual tasks, time, rate, and factual basis for each component. If a reasonable modification would materially reduce cost or burden while preserving the substance of the request, please identify that specific modification pursuant to G.L. c. 66, § 10(b)(vii).

If no responsive records exist for a particular category, please simply state that.

Please confirm receipt of this request.

Thank you,

Joey Ford
Parent Data Force

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MESSAGE 2 of 5
From: "Holcomb, Scott" scott.holcomb@swanseaschools.org
To: Parent Data Force Joey@parentdataforce.com
Cc: ewhite@swanseaschools.org, Sean Scanlon sscanlon@swanseaschools.org, Amanda Silveira asilveira@swanseaschools.org, Joanne Rebelo joanne.rebelo@swanseaschools.org
Date (as indexed by Gmail): 2026-09-24T18:58:28
Subject: Re: Swansea Public Schools — Massachusetts Public Records Request — Student Settlement Agreements, MOUs, MOAs & Resolution Agreements (Sept. 18, 2021–Present)
Gmail message ID: 1a0d4c8b7653179c
Original body:
Dear Mr. Ford:

This email confirms receipt of your public records request seeking certain

student/education-related agreements for the period beginning September 18, 2021 through the date of the District's response.

The District is reviewing its records to identify documents potentially responsive to your request. Because the requested records concern students and may constitute education records and/or student records protected by federal and Massachusetts law, responsive records will require review to determine what information, if any, must be withheld or redacted pursuant to applicable law, including FERPA, the Massachusetts Student Records Regulations, and applicable exemptions to the Massachusetts Public Records Law.

The District will also consider the requirements concerning reasonably segregable portions of responsive records, including the principles addressed in Champa v. Weston Public Schools, 473 Mass. 86 (2015).

Given the scope of the request, the five-year period involved, and the need to review responsive records for both direct and indirect personally identifiable student information, the District is presently assessing the volume of potentially responsive records and the time reasonably necessary to search for, compile, review, segregate, and redact those records.

To the extent permitted by G.L. c. 66, § 10 and 950 C.M.R. 32.00, the District reserves its right to assess reasonable fees associated with responding to this request. If the District determines that a fee is warranted, it will provide a written, itemized, good-faith estimate identifying the basis for the fee before undertaking work for which advance payment may be required.

The District will also consider whether reasonable modification of the scope of the request could materially reduce the time and cost associated with production while preserving the substance of the request. If such a modification is identified, the District will communicate that information to you.

This acknowledgment should not be construed as a determination that every category of record described in your request constitutes a public record subject to disclosure. The District will evaluate responsive records and applicable confidentiality requirements, privileges, and exemptions in accordance with applicable law.

The District will respond further within the time required by the Massachusetts Public Records Law.

Thank you.

Sincerely,

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MESSAGE 3 of 5
From: “Holcomb, Scott” scott.holcomb@swanseaschools.org
To: Parent Data Force Joey@parentdataforce.com
Cc: ewhite@swanseaschools.org, Amanda Silveira asilveira@swanseaschools.org, Sean Scanlon sscanlon@swanseaschools.org, Lindsey Rapoza lindsey.rapoza@swanseaschools.org, Joanne Rebelo joanne.rebelo@swanseaschools.org
Date (as indexed by Gmail): 2026-10-06T12:06:44
Subject: Re: Swansea Public Schools — Massachusetts Public Records Request — Student Settlement Agreements, MOUs, MOAs & Resolution Agreements (Sept. 18, 2021–Present)
Gmail message ID: 1a1111c1f3baad61
Original body:
Good Morning,

I am writing in my capacity as Records Access Officer for the Swansea Public Schools in response to your public records request received on September 23, 2026. Your request seeks, for the period September 18, 2021 through the date of the District’s response, final or executed student-related agreements resolving, compromising, settling, memorializing, or otherwise disposing of disputes, claims, complaints, appeals, due-process matters, grievances, or other contested educational matters, including settlement agreements, resolution agreements, memoranda of understanding, memoranda of agreement, mediation agreements, and related responsive records.

The District has begun evaluating the scope of your request and identifying potentially responsive records. Because the request encompasses approximately five years of records and multiple categories of student-related matters, compliance will require the District to search for and identify potentially responsive records maintained in multiple locations, review those records to determine responsiveness, eliminate duplicate and non-responsive records, and review responsive records for information that is confidential or otherwise exempt from disclosure under applicable state and federal law.

Student Record Confidentiality and Required Review

Many of the records potentially responsive to your request concern

individual students and may contain personally identifiable student information protected from disclosure by state and federal law, including the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232g and 34 C.F.R. Part 99, and the Massachusetts Student Records Regulations, 603 CMR 23.00.

Accordingly, before producing responsive records, the District must review each responsive document to determine whether information must be withheld or redacted in order to comply with these confidentiality requirements and any other applicable exemptions or privileges.

The District does not presently take the position that every document responsive to your request is exempt from disclosure in its entirety. Rather, the District will review responsive records individually and intends to produce reasonably segregable portions of responsive public records while withholding or redacting information where disclosure is prohibited by law or otherwise exempt from disclosure.

Good-Faith, Itemized Fee Estimate

Pursuant to G.L. c. 66, § 10(d) and 950 CMR 32.07, the District provides the following itemized, good-faith estimate of the cost of responding to your request.

The estimate is based upon the District's preliminary assessment of the locations in which potentially responsive records may be maintained, the approximately five-year period covered by the request, the multiple categories of student-related agreements identified in the request, and the need to review responsive records for information that is confidential and prohibited from disclosure by state or federal law.

Based upon that preliminary assessment, the District presently estimates that approximately 20 hours of employee time will be required, allocated as follows:

- Identification of Potential Record Sources and Search Parameters (1 hour)

The District estimates approximately 1 hour to identify the District offices, electronic repositories, files, and record custodians reasonably likely to maintain agreements responsive to the request and to establish appropriate search parameters for the September 18, 2021 through September 23, 2026 time period.

Estimated time: 1 hour
Estimated cost: $25.00

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Search and Retrieval of Potentially Responsive Records (5 hours)

The District estimates approximately 5 hours to conduct searches of the locations reasonably likely to contain responsive records, retrieve potentially responsive agreements and related final resolution documents, and collect those records for review. Because the request encompasses approximately five years and multiple categories of student-related disputes and proceedings, the search cannot reasonably be confined to a single file, database, or category of records.

Estimated time: 5 hours
Estimated cost: $125.00

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Initial Responsiveness Review and Elimination of Duplicate or Non-Responsive Records (3 hours)

The District estimates approximately 3 hours to review the records identified through the searches to determine whether they fall within the scope of the request, eliminate duplicate copies, distinguish final or executed agreements from drafts and unrelated materials, and organize responsive records for further review.

Estimated time: 3 hours
Estimated cost: $75.00

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Review for Legally Protected Student Information (4 hours)

The District estimates approximately 4 hours to review responsive records to identify personally identifiable student-record information that is prohibited from disclosure under applicable state and federal law, including FERPA, 20 U.S.C. § 1232g and 34 C.F.R. Part 99, and the Massachusetts Student Records Regulations, 603 CMR 23.00.

Because the records sought concern agreements resolving individual student-related disputes, the District reasonably anticipates that

responsive documents will contain student names and may also contain other information capable of identifying individual students, including information concerning educational programming, disability-related services, disciplinary matters, placements, evaluations, claims, or other student-specific circumstances.

Estimated time: 4 hours
Estimated cost: $100.00

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Legally Required Segregation and Redaction (5 hours)

The District estimates approximately 5 hours to perform the segregation and redaction necessary to prevent disclosure of personally identifiable student-record information and other information whose disclosure is prohibited by applicable law.

This estimate includes only segregation and redaction that the District determines is required by law. The District is not assessing a fee for discretionary redaction or segregation that is not otherwise authorized by G.L. c. 66, § 10(d) and the applicable Public Records Regulations.

The estimate reflects the nature of the requested records. Student-related settlement and resolution agreements may contain identifying information throughout the documents rather than solely in a caption or signature block. Accordingly, responsive agreements must be reviewed individually to determine whether student names, parent names, addresses, dates, educational information, disability-related information, disciplinary information, placement information, or other contextual information could directly or indirectly identify an individual student.

Estimated time: 5 hours
Estimated cost: $125.00

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Final Quality-Control Review and Preparation for Electronic Production (2 hours)

The District estimates approximately 2 hours to conduct a final review of the responsive records to confirm that required redactions have been consistently applied, verify that exempt information has not inadvertently been disclosed, organize the responsive records, and prepare the records

for electronic production.

Estimated time: 2 hours
Estimated cost: $50.00

Summary of Estimated Charges

Identification of record sources/search parameters:
1 hour $25.00

Search and retrieval:
5 hours $125.00

Responsiveness/duplicate review:
3 hours $75.00

Review for legally protected student information:
4 hours $100.00

Legally required segregation/redaction:
5 hours $125.00

Final quality-control review/electronic production:
2 hours $50.00

Total estimated employee time: 20 hours
Hourly rate: $25.00
Estimated labor cost: $500.00
Estimated electronic reproduction cost: $0.00
Total estimated fee: $500.00

No charge is being assessed for electronic reproduction itself.

The hourly rate used for this estimate is $25.00 per hour. This rate does not exceed the statutory maximum and does not exceed the hourly rate attributable to the lowest-paid employee reasonably capable of performing the work required for this request.

The Town of Swansea had a population of 17,144 according to the 2020 United States Census. Because Swansea’s population does not exceed 20,000 persons, the District understands G.L. c. 66, § 10(d)(iii) and 950 CMR 32.07 to permit the assessment of otherwise permissible employee-time charges beginning with the first hour of work.

Accordingly, the District's present total good-faith fee estimate is $500.00.

This estimate is based upon information presently available to the District and represents the District's good-faith assessment of the work reasonably necessary to respond to the request. It is not a representation that the actual time required will necessarily equal 20 hours. The District will undertake reasonable efforts to process the request efficiently and will not charge the requester for work that is not reasonably necessary to respond to the request.

If the actual time necessary to complete the response is less than estimated, the District will assess only the amount properly attributable to the work actually performed. If circumstances discovered during the search materially affect the scope of the work or the estimate, the District will notify the requester before assessing charges beyond this estimate.

With respect to segregation and redaction, the District is including such time in this estimate only to the extent that the segregation or redaction is required by law, including applicable state and federal laws protecting personally identifiable student-record information, or is otherwise authorized by the Massachusetts Public Records Law and applicable regulations.

Timeframe for Production

The District is unable to complete production within 10 business days of its receipt of the request due to the magnitude and difficulty of the request. Specifically, the request encompasses approximately five years of records, multiple categories of student-related disputes and agreements, records that may be maintained in multiple locations, and records requiring individualized review to identify and protect personally identifiable student information whose disclosure is prohibited by state or federal law.

Pursuant to G.L. c. 66, § 10(b), the District anticipates producing the responsive, non-exempt portions of the requested records as soon as reasonably practicable and no later than October 29, 2026, subject to receipt of payment of the properly assessed fee described in this response.

If you voluntarily agree to a later production date, the District will proceed in accordance with that agreement. If circumstances arise that make production within the statutory timeframe impracticable, the District will take such steps as may be authorized by G.L. c. 66, § 10 and 950 CMR 32.00,

including, where appropriate, seeking an extension from the Supervisor of Records.

Opportunity to Narrow the Request and Payment of Fee

The District is willing to work with you to reduce the cost and time associated with responding to your request. For example, you may wish to narrow the time period, categories of agreements, types of proceedings, or other aspects of the request.

If you would like to modify or narrow your request, please contact me and the District will work with you in good faith to determine whether a narrower request could be fulfilled more efficiently and at a reduced cost.

If you wish the District to proceed with your request as presently written, payment of the $500.00 good-faith fee estimate is required before the District undertakes the work necessary to produce the requested records. Upon receipt of payment, the District will proceed with the search, review, legally required segregation and redaction, and production of responsive, non-exempt records.

The District's production time frame stated above is subject to receipt of the properly assessed fee. If payment is not received, the District will not undertake the work reflected in this fee estimate. You may instead contact the District to discuss narrowing or modifying the scope of your request in a manner that may reduce the estimated cost.

Right of Appeal

Pursuant to G.L. c. 66, § 10A and 950 CMR 32.08, you have the right to appeal this response to the Supervisor of Records, Division of Public Records, Office of the Secretary of the Commonwealth, in accordance with the procedures established by law. You also have the right to seek judicial review of an unfavorable decision by commencing a civil action in the Superior Court pursuant to G.L. c. 66, § 10A©.

Sincerely,

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MESSAGE 4 of 5
From: Parent Data Force Joey@parentdataforce.com
To: scott.holcomb@swanseaschools.org
Cc: ewhite@swanseaschools.org, asilveira@swanseaschools.org, sscanlon@swanseaschools.org, lindsey.rapoza@swanseaschools.org,

joanne.rebelo@swanseaschools.org
Date (as indexed by Gmail): 2026-10-06T12:15:32
Subject: Re: Swansea Public Schools — Massachusetts Public Records Request — Student Settlement Agreements, MOUs, MOAs & Resolution Agreements (Sept. 18, 2021–Present)
Gmail message ID: 1a11123fb02bbbc4
Original body:
Good morning,

Thank you for laying this out. I appreciate the District being willing to work with me on narrowing this rather than forcing everyone into a more formal process.

I am willing to narrow the time period substantially. The Boston Globe's prior statewide settlement project covered records through 2023, so I am willing to limit my request to the period beginning at the end of Swansea's prior Globe production/collection period and continuing through the present. If Swansea used a specific cutoff date in 2023 for the Globe's request, please feel free to use that same cutoff date as the starting point here.

I also want to clarify the scope a little. The list of terms in my original request was meant to be inclusive so that a responsive student settlement would not be missed simply because it was called an MOU, resolution agreement, side agreement, etc. In substance, I am looking for final written agreements resolving student-related disputes, similar to what was sought in the Globe project, except that I am also asking that responsive general-education student matters be included.

I am attaching two examples of responsive settlement agreements produced by another Massachusetts district. I am not suggesting every Swansea agreement will look exactly the same, but they are useful examples of what I mean about the redaction burden. The substantive terms remain readable, while the redactions are largely limited to names and other discrete identifying details rather than requiring broad substantive portions of the agreements to be removed.

That is why the 9 hours presently estimated just for student-information review and redaction seems on the high side to me, especially once the time period is narrowed. Other districts have also been able to provide comparable records without a fee. I understand Swansea has fewer resources and falls under the 20,000-population threshold, so I am not trying to pretend there is no burden at all. I am just hoping we can find a practical middle ground.

These records are being collected for public dissemination alongside responses from districts across Massachusetts. I would much rather be able to present Swansea as a district that worked cooperatively and in good faith to make the records accessible.

I would also prefer to resolve this informally instead of going through the appeals process. An appeal creates more work for everyone, and I am trying to keep this as unburdensome as possible for the District's staff and finances.

Please let me know how you would like to proceed with the narrowed scope and whether the District can revisit the estimate based on that narrowing. I am also happy to talk it through by phone if that is easier. My number is 339-213-6110.

Thank you,

Joey Ford
Parent Data Force

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MESSAGE 5 of 5
From: "Holcomb, Scott" scott.holcomb@swanseaschools.org
To: Parent Data Force Joey@parentdataforce.com
Cc: ewhite@swanseaschools.org, asilveira@swanseaschools.org, sscanlon@swanseaschools.org, lindsey.rapoza@swanseaschools.org, joanne.rebelo@swanseaschools.org
Date (as indexed by Gmail): 2026-10-14T01:09:01
Subject: Re: Swansea Public Schools — Massachusetts Public Records Request — Student Settlement Agreements, MOUs, MOAs & Resolution Agreements (Sept. 18, 2021–Present)
Gmail message ID: 1a137f4d3fefcf12
Original body:
Thank you for clarifying the scope and offering to narrow the period covered by your request. Based on that narrowing, the District is revising its preliminary good-faith estimate from $500 to $325.

We will use the cutoff date from Swansea's prior Boston Globe production to establish the beginning of the revised period, once that date is confirmed. The scope will include final written agreements resolving student-related disputes, including general-education matters, regardless of the title used for the agreement.

Using the original estimate as a baseline, we have reduced the anticipated

time for searching and retrieving records, reviewing protected student information, performing legally required redactions, and completing the final quality-control review and electronic production. The revised breakdown is:

- Identify sources and establish search parameters: 1 hour, $25.
- Search and retrieve records: 3 hours, $75.
- Identify responsive records and remove duplicates: 3 hours, $75.
- Review for legally protected student information: 2 hours, $50.
- Perform legally required segregation and redaction: 3 hours, $75.
- Final quality-control review and electronic production: 1 hour, $25.

Total estimated employee time: 13 hours at $25 per hour.
Electronic reproduction cost: $0.
Total revised estimate: $325.

The shorter period is expected to reduce the work required to retrieve, review, and redact responsive records. However, the time needed to identify record sources, establish search parameters, and distinguish final responsive agreements from drafts, duplicates, and other documents does not necessarily decrease in direct proportion to the date range. The revised estimate therefore reflects reductions in the tasks we anticipate will take less time rather than an across-the-board percentage reduction.

This remains a preliminary estimate rather than a charge for work already completed. The District will track the actual time, and any final charge will be reduced if the work requires less time than estimated.