Swansea Public Schools - supplemental explanation to the Public Records Division, SP

Dear Attorney Durgin:

Thank you for providing notice of Parent Data Force's appeal. I submit this supplemental explanation on behalf of Swansea Public Schools and am copying the requestor.

The District's revised $325 estimate represents 13 anticipated employee hours, rather than work already completed or a determination of the final charge. Following the requestor's narrowing of the requested period, the District reduced its original estimate by $175, from 20 hours to 13 hours.

The revised estimate was developed by reconsidering the original task allocations in light of the narrower period. It was not based on a completed inventory or page-by-page review of responsive records. The District acknowledges that the prior Boston Globe production cutoff remains to be confirmed and does not represent that a definitive document or page count has been established.

The anticipated tasks involve locating potentially responsive records, distinguishing final agreements from drafts and duplicates, identifying information requiring protection under applicable student-confidentiality laws, and preparing redacted copies for disclosure. The District is not asserting that entire agreements are exempt merely because they concern students.

The separate task descriptions were intended to distinguish stages of the work, not to charge twice for the same activity. The District would not charge duplicate time or time for discretionary redactions without any required approval. Electronic reproduction was estimated at $0. Any final assessment would be limited to actual, reasonable, legally permissible costs and reduced where the work requires less time than estimated.

The District recognizes the public-interest purpose stated by the requestor. In considering his request for a waiver or reduction, the District has weighed that purpose against the employee time and public resources necessary to fulfill the request. At this stage, the District is maintaining its request for recovery of permissible costs rather than granting a full waiver. The reduction already offered reflects the anticipated effect of the narrower scope.

The District respectfully requests that the Supervisor review this supplemental explanation and the existing correspondence and identify any

specific additional information necessary to evaluate the revised estimate. If further workload substantiation is required, please clarify whether reasonable preliminary ranges, existing staff knowledge, or a limited representative sample would suffice, rather than a completed inventory and review of all potentially responsive records. This guidance would help the District address any remaining deficiencies efficiently while preserving staff resources for ongoing student services and district operations.

The District remains willing to provide responsive, segregable public records subject to lawful protections for student information and applicable fee requirements.

Thank you for your consideration.