

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224

Via Email Only

September 23, 2026

Joey Ford
Joey@parentdataforce.com

Re: Request for Records, dated September 21, 2026

Dear Mr. Ford

This is a response to your request for records dated September 21, 2026, in which you seek the following records:

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 Amesbury Public Schools, including:

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

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224

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.

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

**5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224**

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)**.

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224

To the extent your request seeks records relating to your request or other documents, or similar language, it is unclear what you are seeking. The Public Records Law requires a requester to “identify documents or categories of documents with sufficient particularity that government employees will be able to understand exactly what they are looking for, and then make a prompt production. Requests for documents that are articulated with very broad language that calls upon non-lawyer administrative personnel to interpret the scope of what is sought, and then make fine judgments about what documents are and are not sufficiently ‘related’ to the category of materials requested, will not satisfy this statutory standard.” *Chawla v. Dep’t of Revenue*, Suffolk Sup. Ct., No. 1784CV02087, at *2 (January 23, 2019) (emphasis in original); *see also Friedman v. Div. of Admin. Law Appeals*, 103 Mass. App. Ct. 806, 815-16 (2024) (“A reasonable description of the requested record is necessary so that the records can be identified and located promptly”, and this “requirement is a necessary bulwark of the public records law....”) (internal citations and quotation marks omitted). As a result, these portions of your request do not meet the reasonable description requirement of the Public Records Law.

To the extent your request does reasonably describe the records sought, the District does not have a single document with all of the requested information and does not necessarily maintain all of the records you requested in a single, comprehensive folder; instead, there are potentially hundreds of pages of documents that would have to be collected over the period you identified, many of which may be maintained only in paper format.

State law and regulations permit a municipal entity such as the District to charge fees for time required to search for, compile, segregate, redact, and reproduce a record. *See* M.G.L. c.66, §10(d); 950 CMR 32.06. The cost of responding to a records request is calculated based on the time required for District employees to search for, compile, segregate, redact or reproduce a record, and the hourly rate for such time is capped at Twenty-Five Dollars (\$25.00) per hour, unless a waiver is granted by the Supervisor of Records. *Id.* In municipalities with 20,000 residents or fewer, all time required to search for, compile, segregate, redact, and reproduce records in response to a public records request may be subject to a fee. *See* M.G.L. c.66, §10(d)(iii); 950 CMR 32.07(m). In the most-recent decennial U.S. Census, the City of Amesbury had a population fewer than 20,000 and, as such, all time involved in responding to your request will be subject to a fee. *See* <https://www.census.gov/quickfacts/fact/table/amesburycitymassachusetts/>.

Given the nature of the request, the lowest paid employee of the District who could continue the search for, compilation, review, segregation, redaction and reproduction of records and make judgments as to which information is public and which information is exempt and must be

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224

redacted would be a member of the District's central office staff, all of whom are compensated at rates exceeding \$25.00 per hour. As such, any time spent completing the response process will be charged at the maximum rate of \$25.00 per hour.

Based on the District's experience responding to public records requests and the process described in this letter, we estimate that it will take District employees on average at least 30 hours to search for, compile, and reproduce the requested documentation. This will involve without limitation creating and running a report of our recordkeeping software to the extent any information is contained therein, searching for any paper records that may be responsive to your request, scanning any paper copies to provide them in electronic format per your request, compiling all of the information to a single file, and then reproducing all records to you. Although this will be a fluid process and may vary for each particular record, especially depending on whether the record is electronic or paper, it will essentially be broken down into a search and compilation step and a reproduction step. We estimate the time will be comprised on average of approximately 60% search time, 20% compilation time, and 20% reproduction time.

As such, we estimate it will take a total of 30 hours of employee time to complete the District's search for, compilation, and reproduction of all requested records. The total fee estimate for this work is \$750 (30 hours x \$25/hour).

We realize this is a significant fee; however, it reflects the significant amount of employee time required to respond to your request given the large number of potentially responsive records for the specific searches you requested. If you would like to modify the scope of your request, such as by including particular and/or modified search terms, subject matters, types of records, specific dates/narrowed time frames, etc., we may be able to complete these process more efficiently and reduce any corresponding fees.

If instead you wish to have the District complete the process described above, please provide my office with a check made out to the District in the above amount and note on the check that it relates to your records request. After receipt of this payment, we will proceed with the District's search for, compilation, review, segregation, redaction, and reproduction of responsive records in the manner described above. If the time that it takes the District to complete this process exceeds the estimated time, the District will require that you pay for the additional, actual time at the applicable hourly rate, prior to providing the requested records to you. If the actual time that it takes the District to complete this process is less than the estimated time, the District will refund any overpayment to you.

AMESBURY PUBLIC SCHOOLS

STEPHEN ZADRAVEC
SUPERINTENDENT OF SCHOOLS



DANIEL GRAYTON
DIRECTOR OF FINANCE & OPERATIONS

MARTHA ROBINSON
DIRECTOR OF STUDENT SERVICES

CHRISTOPHER HEATH
DIRECTOR OF TEACHING,
LEARNING & EQUITY

5 Highland Street
Amesbury, MA 01913
Tel : 978-388-0507
Fax : 978-388-7224

In addition, although the District's records are generally maintained in electronic format, your request seeks a wide variety of records, including paper records, and some records responsive to your request may not be maintained electronically. To the extent any records must be copied or printed for redaction or otherwise in order to respond to your request, there may be additional associated fees of \$0.05 per page pursuant to M.G.L. c.66, §10(d)(i) and 950 CMR 32.07(2)(e).

You have the right of administrative appeal to the Supervisor of Records under 950 CMR 32.08(1) and the right to seek judicial review of an unfavorable decision by commencing a civil action in the superior court. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to be "SZ", written over a light blue rectangular background.

Stephen Zdravec
Superintendent of Schools