

Subject: SPR22/0378

Date: Thursday, February 17, 2022 at 11:20:39 AM Eastern Standard Time

From: R S <rebstone80@gmail.com>

To: marcus.kuhs2@state.ma.us <marcus.kuhs2@state.ma.us>, pre@sec.state.ma.us <pre@sec.state.ma.us>, Commonwealth Transparency <info@opencommonwealth.org>, edward.mcgrath@state.ma.us <edward.mcgrath@state.ma.us>

Dear Mr. Kuhs/Secretary of Public Records,

I am writing in support of the above-referenced public records request from OpenCommonwealth to Mr. McGrath/Division of Administrative Law Appeals (DALA) in which OpenCommonwealth seeks all electronic communications etc. between the Bureau of Special Education Appeals (BSEA) and the firm Murphy, Hesse, Toomey & Lehane (MHTL). I, along with many other concerned and interested citizens, continue to carefully follow this public records request via OpenCommonwealth's Twitter account and website, as there is a growing chorus of concern about the nature of the relationship and communications between the BSEA and MHTL and, potentially, the adverse impact of such upon the public and upon children with special needs.

Based on the latest post to OpenCommonwealth's Twitter account on this matter, I feel compelled to write to emphasize and highlight the following:

1. Contrary to Mr. McGrath/DALA's unsupported and unsupported protestations, there is no "SPAM" exception to public records law (and while I would add that Mr. McGrath's SPAM assertion is unsupported by evidence of any kind, even were he to produce such evidence there still remains no SPAM exception to the public records law, just as there remains no "vacation" or "PTO" or "my dog ate my homework" exception to the public records law).
2. Even if the Secretary of Public Records had the power to create such a SPAM exception (which it does not), it would be dangerous precedent to create or allow for such an exception to suit Mr. McGrath's purposes, as then every public entity / RAO could claim the same SPAM exception in the future to bypass the 10-day response requirement, completely undermining the fee-based incentive to for RAO's to be responsive and timely to public records requests.
3. Mr. McGrath's assertion that OpenCommonwealth's historic public records historic to any 3rd party organization (organization(s) which do not share Mr. McGrath's "@state.ma.us" email extension) somehow through osmosis triggered DALA's "state.ma.us" email server to filter OpenCommonwealth's public records request to Mr. McGrath's SPAM folder is unfounded and illogical.
4. Most concerningly, Mr. McGrath appears to point to OpenCommonwealth's website which quite openly highlights to the public OpenCommonwealth's efforts to shine sunlight on, among other things, the extent to which MHTL appears to have integrated itself into the inner dealings (and potentially policy-making and decision-making) of municipal and state organizations, a concern that DALA (having oversight over the BSEA) should be interested in investigating further, not shutting it down.
5. Even assuming, arguendo, that Mr. McGrath's unsupported assertions about his "SPAM" account were true, such SPAM filters are a setting within his/DALA's/MA's own control and due diligence would require that Mr. McGrath, as RAO, regularly check his SPAM folder, which appears he does not do. That would suggest, concerningly, that there are any number of public records requests in Mr. McGrath's SPAM folder, and so long as he never checks said folder, he's never responsible for responding to said requests. While outside the scope of the instant PRR, I would hope that Mr. McGrath will fulfill his obligation at this time to review the entirety of his emails to ensure that all public records requests have been appropriately responded to.
6. Any administrative burden that Mr. McGrath's / DALA's might realize in fulfilling OpenCommonwealth's public records request could easily have been avoided if Mr. McGrath acted upon his obligation to check his SPAM folder the same as he does any other folder to which he has his emails sorted.
7. As a member of the public, I personally take exception to the tone of Mr. McGrath's most recent communication, as based on my own reading of the public records laws, OpenCommonwealth has no obligation to narrow or negotiate their initial public records request, and it is unseemly for Mr. McGrath, as RAO, to not only suggest otherwise but to do so with an indignant and entitled tone.
8. There would be fewer emails in 2019 (pre-COVID, when emails with the BSEA were discouraged), and so Mr. McGrath now being long overdue in producing the requested records could, as a courtesy to all of those of us who

are following this records request, expedite the production of said records by enlisting additional temporary assistance and/or at least producing 2019 (which would likely be the year with the fewest requested emails), and then moving on to 2020 and 2021. The request is not mine, however, so this point is merely a suggestion (one that does not appear to be inconsistent with OpenCommonwealth's PRR).

9. As I read OpenCommonwealth's PRR, the request is for all request records through the date that the request is completely fulfilled, and thus Mr. McGrath's multi-month delay in producing the requested records has produced multiple additional months of responsive records that DALA must now produce. As such, I would hope that Mr. McGrath will not delay further production of all responsive records to OpenCommonwealth.

10. I would finally reiterate that there is great public interest, myself among such, in OpenCommonwealth's PRR being fulfilled.

On a personal note, I hope that Mr. McGrath will start to listen to the outcry from the disability community as it relates to BSEA, the decisions heavily slanted in favor of school districts while dismissive of parents who ARE the experts in their own children and their children's needs, and will make itself more involved in the goings on of the BSEA to ensure that unmet needs of vulnerable disabled children and their parent/guardian advocates are being appropriately addressed and not just out-gunned by the seemingly endless legal funds of municipalities who keep careful reign over disability quotas and spending on disabled children, but who, from this authors perspective, don't appear to keep an appropriate tally on the legal expenses they incur to achieve those quote and student spending cap goals.

Thank you,
rebstone80@gmail.com

Subject: RE: In Re: SPR22/0378

Date: Thursday, February 17, 2022 at 9:44:57 AM Eastern Standard Time

From: McGrath, Edward (ALA) <edward.mcgrath@state.ma.us>

To: Kuhs, Marcus (SEC) <marcus.kuhs2@state.ma.us>, pre@sec.state.ma.us <pre@sec.state.ma.us>

CC: Commonwealth Transparency <info@opencommonwealth.org>

The statement below is factually inaccurate. On October 25, 2021, the RAO responded by email to the notice received from the Supervisor of Public Records and copied the Requestor with that email. On November 8, 2021, Supervisor Murray issued the determination concerning SPR21/2748. On November 22, 2021, the agency complied with that determination.

Ed McGrath

Edward B. McGrath
Chief Administrative Magistrate
Division of Administrative Law Appeals
14 Summer Street, 4th Floor
Malden, MA 02148
(781)397-4710
Fax(781)397-4720

From: Commonwealth Transparency <info@opencommonwealth.org>

Sent: Thursday, February 17, 2022 9:30 AM

To: pre@sec.state.ma.us

Cc: McGrath, Edward B. (ALA) <edward.mcgrath@mass.gov>; Marcus Kuhs <marcus.kuhs@sec.state.ma.us>

Subject: In Re: SPR22/0378

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Greetings:

Also for your consideration:

The SPR should be aware that even if the SPAM issue is completely bypassed; the RAO admits his "Awareness" of the PRR on 10/25/2021. The RAO failed to provide an initial response within 10 business days of his "Awareness"; he provided his initial response and \$0 estimate on 11/22/2021 which is 20 business days after his "Awareness".

The arguments of the RAO are wholly without merit and should be dismissed as such.

Kindest Regards,

OpenCommonwealth.org

On Feb 16, 2022, at 11:59 AM, Kuhs, Marcus (SEC) <marcus.kuhs2@state.ma.us> wrote:

Dear Records Custodian,

Please be aware, this office has received an appeal relating to your entity's response to a request for public records. Attached are further details concerning this appeal. If you have any questions or wish to provide further information relating to this matter, please contact the Public Records Division at pre@sec.state.ma.us or 617-727-2832. Given that the Supervisor of Records must issue a determination within 10 business days of receipt of the appeal petition, please provide any additional information to this office as soon as possible.

Sincerely,

Marcus

Marcus Kuhs, Esq. (he/him/his)
Office of the Secretary of the Commonwealth
Public Records Division
One Ashburton Place, Room 1719
Boston, MA 02108
617-727-2832

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From: Commonwealth Transparency info@opencommonwealth.org
Subject: In Re: SPR22/0378
Date: Feb 17, 2022 at 9:29:44 AM
To: pre@sec.state.ma.us
Cc: McGrath, Edward (ALA) edward.mcgrath@state.ma.us, Marcus
Kuhs marcus.kuhs2@state.ma.us

Greetings:

Also for your consideration:

The SPR should be aware that even if the SPAM issue is completely bypassed; the RAO admits his "Awareness" of the PRR on 10/25/2021. The RAO failed to provide an initial response within 10 business days of his "Awareness"; he provided his initial response and \$0 estimate on 11/22/2021 which is 20 business days after his "Awareness".

The arguments of the RAO are wholly without merit and should be dismissed as such.

Kindest Regards,

[OpenCommonwealth.org](https://opencommonwealth.org)

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<marcus.kuhs2@state.ma.us> wrote:

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Sincerely,

Marcus

Marcus Kuhs, Esq. (he/him/his)
Office of the Secretary of the Commonwealth
Public Records Division
One Ashburton Place, Room 1719
Boston, MA 02108
617-727-2832



SPR22-0378.pdf

4.3 MB



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Public Records Division

Rebecca S. Murray
Supervisor of Records

February 16, 2022
SPR22/0378

Commonwealth Transparency
opencommonwealth.org
Via Email
MA

Dear Commonwealth Transparency:

I have received your letter appealing the response of the Division of Administrative Law Appeals to your request for records.

I have directed a member of my staff, Marcus Kuhs, to review this matter. Upon completion of the review, I will advise you in writing of the disposition of this case. If in the interim you receive a satisfactory response to your request, please notify this office immediately.

Any further correspondence concerning this specific appeal should refer to the SPR case number listed under the date of this letter.

A handwritten signature in black ink that reads "Rebecca Murray".

Rebecca S. Murray
Supervisor of Records

Cc: Edward B. McGrath

From: [Commonwealth Transparency](#)
To: [SEC-DL-PREWEB](#)
Cc: [McGrath, Edward \(ALA\)](#); [Kuhs, Marcus \(SEC\)](#)
Subject: Request for Appeal - A.K.A. SPR22/0308
Date: Tuesday, February 15, 2022 7:22:59 PM
Attachments: [spr220308.pdf](#)
[Response to Info@OpenCommonwealth.com SPR22_0308\[80\].pdf](#)
[How to Request a Public Record from the Division of Administrative Law Appeals Mass.gov.pdf](#)
[SPAM Reputation.pdf](#)
[PRR info@opencommonwealth.com Nov. 22, 2021\[87\].pdf](#)
[Update PRR info@OpenCommonwealth.Com December 6, 2021\[93\].pdf](#)
[10-7-2021 Delivery Receipt AND Header.pdf](#)
Importance: High

Greetings:

On February 11, 2022 the SPR issued a determination for SPR 22/0308 (attached).

The findings and Order state specifically: “G. L. c. 66, § 10(e) provides that “[a] records access officer shall not charge a fee for a public record unless the records access officer responded to the requestor within 10 business days under subsection (b).” Given that Commonwealth Transparency requested the records on October 7, 2021 and the Division provided Commonwealth Transparency with its initial response on November 22, 2021, the Division must demonstrate that it provided a response in compliance with G. L. c. 66, § 10(b) in order to assess fees for responsive records.”

And

“Accordingly, the Division is ordered to provide a response to the requestor, in a manner consistent with this order, the Public Records Law and its Regulations within 10 business days. A copy of any such response must be provided to this office. It is preferable to send an electronic copy of this response to this office at pre@sec.state.ma.us. The Commonwealth Transparency may appeal the substantive nature of the Division’s response within ninety (90) days. See 950 C.M.R. 32.08(1).”

On February 15, 2022 the email below and attached attachment were received by OpenCommonwealth.org.

For the following reasons, OpenCommonwealth.org appeals this response of the RAO to the SPR:

1. The RAO admits that his ***first response*** was on November 22, 2021 (31 business days after the request was received) and It is attached hereto. In this initial response the undersigned RAO states ***“This responds to your public records request received by this Office on October 7, 2021.”*** Then he goes on to conclude the approximation of “more than 11,000 responsive records” and ***“We currently expect to produce responsive records that have been completed within two weeks and will provide a firm date for completion of the full request at that time. We do not expect to charge any fees to respond to this request at this time and will let you know if our expectation changes.”***
2. On December 6, 2021 (40 business days after the request was received) the attached letter from the RAO also concedes ***“This will update our response dated November 22, 2021 to your public records request received by this Office on October 7, 2021.”***

3. On December 20, 2021 (50 business days after the request was received) the RAO released 566 emails. The RAO has claimed that there are in excess of 11,000 emails divided into 15 batches. The RAO had taken 50 days to produce what amounts to approximately 5% of the estimated responsive emails.
4. The RAO of the Division of Administrative Law Appeals describes himself as the “Primary” RAO and specifically lists his email address in the attached printout of the website found here : <https://www.mass.gov/how-to/how-to-request-a-public-record-from-the-division-of-administrative-law-appeals>
5. Regardless of how the RAO characterizes the receipt, ***the request was received*** on October 7, 2021. The argument of how it was organized, when he decided to read or review his SPAM folder contents, or how it ended up in his spam folder are not matters of determination for the SPR. The law requires “A request for public records may be delivered to the records access officer by hand or via first class mail at the record officer's business address, ***or via electronic mail to the address posted by the agency or municipality that the records access officer serves.***” The RAO’s argument that he “...became aware of the request on October 25, 2021...” is akin to obligating the requestor to verify that a proper, lawful request sent by email was found and that the receiver has become aware of it. This burden does not and should not exist.
6. On October 7th, 2021 the original request was sent. The attached receipt verifies the delivery to the email address specified on the webpage referenced above in #2 and was marked as “X-MS-Exchange-Organization-SCL: 1” or “Spam filtering determined the message was not spam.”, and “Deliver the message to the recipients' inbox.” This information can be found in the attached delivery receipt and Header information and the validation of the SCL information can be found publicly at: <https://docs.microsoft.com/en-us/microsoft-365/security/office-365-security/spam-confidence-levels?view=o365-worldwide>
7. Attached, you will find verification that the OpenCommonwealth.org domain has a clean bill of health from all of the leading consortium members of email and domain reputations, Cisco (TALOS), Barracuda and McAfee. Their reports are attached hereto. OpenCommonwealth.org does is not flagged as a SPAM block.
8. The RAO indicates that he believes that the email was marked as SPAM “...because it was a part of a shotgun public records request by sending multiple agencies public record requests at the same time...” and includes a non-functional URL marked as footnote 2. The reference to said “Open Malden Investigates” article includes references to emails sent to school districts regarding billing records for a specific law firm. The SPR is aware of these emails and the subsequent appeals, which were sent from an entirely different email domain and email address; info@openmalden.com. This is a red herring.
9. At no time from October 7, 2021 through today, did the RAO request an extension. At no time until December 20, 2021 did the RAO estimate any fees, conversely he indicated that there would be no fees. The last “FIRM” date of completion proffered by the RAO in his December 20, 2021 letter is for this Thursday,, February 17, 2022.

Wherefore OpenCommonwealth.org requests that the SPR find and Order that the RAO failed to respond timely to the request of October 7, 2021, that the RAO has failed to provide all responsive records as requested despite having multiple months to do so, that the RAO never sought or received an extension of time from the SPR, that the RAO never sought or received an approved fee

petition from the SPR, that the RAO is barred from assessing or charging fees for the responsive records, and Order that the RAO immediately and without charge produce all responsive records.

Kindest Regards,

OpenCommonwealth.org

From: McGrath, Edward (ALA) <edward.mcgrath@state.ma.us>
Date: Tuesday, February 15, 2022 at 1:38 PM
To: Kuhs, Marcus (SEC) <marcus.kuhs2@state.ma.us>
Cc: Commonwealth Transparency <info@opencommonwealth.org>, SEC-DL-PREWEB <SEC-DL-PREWEB@sec.state.ma.us>
Subject: RE: Appeal Acknowledgment SPR22/0308 response

Mr. Kuhs,
Attached please find the agency's response for your consideration.
Thank you.
Ed McGrath

Edward B. McGrath
Chief Administrative Magistrate
Division of Administrative Law Appeals
14 Summer Street, 4th Floor
Malden, MA 02148
(781)397-4710
Fax(781)397-4720

From: Kuhs, Marcus (SEC) <marcus.kuhs@sec.state.ma.us>
Sent: Tuesday, February 8, 2022 12:28 PM
To: McGrath, Edward B. (ALA) <edward.mcgrath@mass.gov>
Cc: info@opencommonwealth.org; SEC-DL-PREWEB <SEC-DL-PREWEB@sec.state.ma.us>; Kuhs, Marcus (SEC) <marcus.kuhs@sec.state.ma.us>
Subject: Appeal Acknowledgment SPR22/0308

Dear Records Custodian,

Please be aware, this office has received an appeal relating to your entity's response to a request for public records. Attached are further details concerning this appeal. If you have any questions or wish to provide further information relating to this matter, please

contact the Public Records Division at pre@sec.state.ma.us or 617-727-2832. Given that the Supervisor of Records must issue a determination within 10 business days of receipt of the appeal petition, please provide any additional information to this office as soon as possible.

Regards,

Marcus

Marcus Kuhs, Esq. (he/him/his)
Office of the Secretary of the Commonwealth
Public Records Division
One Ashburton Place, Room 1719
Boston, MA 02108
617-727-2832

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The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Public Records Division

Rebecca S. Murray
Supervisor of Records

February 11, 2022
SPR22/0308

Edward B. McGrath, Esq.
Chief Administrative Magistrate
Division of Administrative Law Appeals
1 Congress Street, 11th Floor
Boston, MA 02114

Dear Attorney McGrath:

I have received the petition of Commonwealth Transparency appealing the response of the Division of Administrative Law Appeals (Division) to a request for public records. G. L. c. 66, § 10A; see also 950 C.M.R. 32.08(1). On October 7, 2021, Commonwealth Transparency requested, “any and all electronic mail and/or text messages between the BSEA (inclusive of all BSEA employees, administration, and contractors) and anyone at [a certain] email domain [for the time period of January 1, 2019 to October 7, 2021].”

Previous Appeal

The records sought by Commonwealth Transparency were the subject of a previous appeal. See SPR21/2784 Supervisor of Records Determination (November 8, 2021). There, I ordered the Division to respond to Commonwealth Transparency’s request for records. The Division provided Commonwealth Transparency with an initial response on November 22, 2021 and a subsequent fee estimate on December 20, 2021. Unsatisfied with the Division’s response, Commonwealth Transparency petitioned this office and this appeal, SPR22/0308, was opened as a result.

The Public Records Law

The Public Records Law strongly favors disclosure by creating a presumption that all governmental records are public records. G. L. c. 66, § 10A(d); 950 C.M.R. 32.03(4). “Public records” is broadly defined to include all documentary materials or data, regardless of physical form or characteristics, made or received by any officer or employee of any agency or municipality of the Commonwealth, unless falling within a statutory exemption. G. L. c. 4, § 7(26).

It is the burden of the records custodian to demonstrate the application of an exemption in order to withhold a requested record. G. L. c. 66, § 10(b)(iv); 950 C.M.R. 32.06(3); see also Dist. Attorney for the Norfolk Dist. v. Flatley, 419 Mass. 507, 511 (1995) (custodian has the burden of establishing the applicability of an exemption). To meet the specificity requirement a custodian must not only cite an exemption, but must also state why the exemption applies to the withheld or redacted portion of the responsive record.

Fee Estimates

If there are any fees associated with a response a written, good faith estimate must be provided. G. L. c. 66, § 10(b)(viii); see also 950 C.M.R. 32.07(2). Once fees are paid, a records custodian must provide the responsive records.

An agency may assess a reasonable fee for the production of a public record except those records that are freely available for public inspection. G. L. c. 66, § 10(d). The fees must reflect the actual cost of complying with a particular request. Id. A maximum fee of five cents (\$.05) per page may be assessed for a black and white single or double-sided photocopy of a public record. G. L. c. 66, § 10(d)(i).

Agencies may not assess a fee for the first four (4) hours of employee time to search for, compile, segregate, redact or reproduce the record or records requested. G. L. c. 66, § 10(d)(ii). Where appropriate, agencies may include as part of the fee an hourly rate equal to or less than the hourly rate attributed to the lowest paid employee who has the necessary skill required to search for, compile, segregate, redact or reproduce a record requested, but the fee shall not be more than \$25 per hour. Id. A fee shall not be assessed for time spent segregating or redacting records unless such segregation or redaction is required by law or approved by the Supervisor of Records under a petition under G. L. c. 66, § 10(d)(iv). See G. L. c. 66, § 10(d)(ii); 950 C.M.R. 32.06(4).

A fee shall not be assessed for time spent segregating or redacting records unless such segregation or redaction is required by law or approved by the Supervisor under a petition under G. L. c. 66, § 10(d)(iv). G. L. c. 66, § 10(d)(iii); 950 C.M.R. 32.06(4).

The Division's November 22nd Response and December 20th Fee Estimate

On November 22, 2021, the Division stated:

We are actively working on this request but due to [the] fact that there could be more than 11,000 responsive records...and our responsibility to review the documents in-house to remove students' and parents' personally identifying information as required by M.G.L. c. 71B § 2A(b)...it is a time-consuming task.

On December 20, 2021, the Division stated:

[W]e completed redacting the personally identifying information of the students and parents contained in the emails in Batch 1 [of responsive documents] protected by M.G.L. c. 71B § 2A(b)...There is no charge for [Batch 1]. It took a total of 21 hours to finish redacting Batch 1 and there are 14 more batches. Therefore, we believe it will take approximately 294 hours to redact the remainder of the emails responsive to your request. We will charge \$25.00 an hour to perform the task for a total cost of \$7,350.00.

Current Appeal

In their current appeal, Commonwealth Transparency stated, “[the Division] provided their first response...31 business days after the request was made and as a matter of law, precludes the [Division] from charging for any responsive records....The [Division] indicates a fee will be assessed for the responsive records despite failing the legal requirements of providing the initial response and estimate within 10 business days.”

G. L. c. 66, § 10(e)

G. L. c. 66, § 10(e) provides that “[a] records access officer shall not charge a fee for a public record unless the records access officer responded to the requestor within 10 business days under subsection (b).” Given that Commonwealth Transparency requested the records on October 7, 2021 and the Division provided Commonwealth Transparency with its initial response on November 22, 2021, the Division must demonstrate that it provided a response in compliance with G. L. c. 66, § 10(b) in order to assess fees for responsive records.

This office encourages Commonwealth Transparency and the Division to continue to communicate to facilitate providing records more efficiently and affordably. See G. L. c. 66, § 10(b)(vii) (an agency shall suggest a reasonable modification of the scope of the request or offer to assist the requestor to modify the scope of the request if doing so would enable the agency to produce records sought more efficiently and affordably).

Conclusion

Accordingly, the Division is ordered to provide a response to the requestor, in a manner consistent with this order, the Public Records Law and its Regulations within 10 business days. A copy of any such response must be provided to this office. It is preferable to send an electronic copy of this response to this office at pre@sec.state.ma.us. The Commonwealth Transparency may appeal the substantive nature of the Division’s response within ninety (90) days. See 950 C.M.R. 32.08(1).

Edward B. McGrath, Esq.
Page 4
February 11, 2022

SPR22/0308

Sincerely,

A handwritten signature in black ink that reads "Rebecca Murray". The signature is written in a cursive style with a large, looping "M" and a long, sweeping tail on the "y".

Rebecca S. Murray
Supervisor of Records

cc: Commonwealth Transparency



THE COMMONWEALTH OF MASSACHUSETTS

DIVISION OF ADMINISTRATIVE LAW APPEALS

14 SUMMER STREET, 4TH FLOOR

MALDEN, MA 02148

EDWARD B. McGRATH
CHIEF ADMINISTRATIVE MAGISTRATE

TEL: 781-397-4700
FAX: 781-397-4720
www.mass.gov/dala

February 15, 2022

Mr. Marcus Kuhs
Secretary of the Commonwealth
Public Records Division
One Ashburton Place, Room 1719
Boston, MA 02108

Re.: SPR22/0308
Public Record Request Info@OpenCommonwealth.com

Dear Mr. Kuhs:

The agency¹ urges the Supervisor of Records to deny the appeal of Commonwealth Transparency. The agency has worked diligently to comply with the requirements of the Public Record Law and has done so. The Requestor, on the other hand, has refused to cooperate or even respond to the agency. Instead, the Requestor has filed this meritless appeal.

The Request

The request at issue reads:

For the time period January 1, 2019 through the date, you respond with all responsive documents, please provide the following; Any and all electronic mail and/or text messages between the BSEA (inclusive of all BSEA employees, administration and contractors) and anyone at the @mhtl.com email domain.

While the Requestor states that the initial public records request was served on the RAO on November 7, 2020, the RAO did not receive it at that time. The Request was placed in the RAO's spam folder. The agency believes that the Request was placed in the spam folder because it was part of a shotgun public record request by sending multiple agencies public record

¹ The Bureau of Special Education (BSEA) is an independent unit of the Division of Administrative Law Appeals (DALA) and the undersigned is the Records Access Officer (RAO) of the BSEA.

requests at the same time. This belief is based upon information contained in an article entitled "Open Commonwealth Investigates."²

The Response

The RAO became aware of the request on October 25, 2021, when the Requestor filed its first appeal (SPR21/2784). The RAO immediately responded to your office copying the Requestor and stating that he had found the request and it would take at least two weeks to respond, because of the size of the request. On November 8, 2021, Supervisor Murray issued a determination concerning SPR21/2784 ruling that the agency had to provide a written response to the Requestor within ten business days. On November 22, 2021, the agency complied with Supervisor Murray's determination and provided a written response noting that there were about 11,000 emails that needed to be reviewed so that personally identifying information of students and parents contained in the emails and protected by G.L. c. 71B, § 2A(b) could be redacted. It further stated that some redacted documents would be produced in two weeks.

On December 6, 2021, the agency updated its response explaining it was taking longer than expected to redact the information protected by G.L. c. 71B, § 2A(b) from the emails. The agency informed the Requestor that it expected to complete redacting the first batch of emails on or before December 20, 2021. The agency asked the Requestor to consider modifying its request so that the agency could continue to complete the Response in-house. The Requestor did not respond to that letter.

On December 20, 2021, the agency provided its supplemental response and a batch of redacted emails. The agency informed the Requestor that it took 21 hours to redact the information to protect the personally identifiable information of the students and parents mentioned in the emails and again asked the Requestor to modify its request. The agency stated it would provide another batch of redacted emails without charge if the Requestor would wait until February 17, 2021. The agency explained that this interval would allow the agency to perform the redaction in-house and would take into account the shortage of staff during the holidays. The Requestor did not respond to that letter until it filed the present appeal.

The agency complied with the Public Records Law

The Requestor argues that because the RAO did not respond to the Public Record Request until October 25, 2021 the agency violated the Public Record Law, but that argument ignores the language of the statute, the facts of the matter, and common sense. G.L. c. 66, §10(e) provides that a RAO shall not charge a fee for a public record unless he responded to the Requestor within 10 business days as mandated in subsection (b). It is necessary, therefore, to review subsection (b) of the statute. It reads as follows:

²[https://urldefense.com/v3/_https://opencommonwealth.org/?fbclid=IwAR02ax7hsKK7pbBkB CbV0Kw8H4ovKUex7L1BM-sV0uWQq4ly6VqD0la9Qb0_!!CUhgQOZqV7M!yi6AR7gkf-fslELX6fRF6c_QRiWyEYcgEbgqPA1rQZANwpUmYFRy5JYbBC8V35b_ZQkvArk\\$](https://urldefense.com/v3/_https://opencommonwealth.org/?fbclid=IwAR02ax7hsKK7pbBkB CbV0Kw8H4ovKUex7L1BM-sV0uWQq4ly6VqD0la9Qb0_!!CUhgQOZqV7M!yi6AR7gkf-fslELX6fRF6c_QRiWyEYcgEbgqPA1rQZANwpUmYFRy5JYbBC8V35b_ZQkvArk$)

If the agency or municipality does not intend to permit inspection or furnish a copy of a requested record, or the magnitude or difficulty of the request, or of multiple requests from the same requestor, unduly burdens the other responsibilities of the agency or municipality such that the agency or municipality is unable to do so within the timeframe established in subsection (a), the agency or municipality shall inform the requestor in writing not later than 10 business days after *the initial receipt of the request for public records*. The written response shall be made via first class or electronic mail....

(Emphasis added).

By including the highlighted language in subsection (b) the Legislature made it clear that the ten-day deadline to respond to a public record request begins to run when the RAO receives the request. *See Suffolk Constr. Co, Inc. v. Division of Capital Asset Management*, 449 Mass. 444, 454 (2007) (statute should be construed to fulfil the Legislature’s intent, as found most obviously in words of the law itself, interpreted according to their ordinary and approved usage). As the Supreme Judicial Court has held: “‘Receive’ means ‘to take possession or delivery of...’” *Rahim v. District Attorney of Suffolk District*, 486 Mass. 544, 547 (2020) (citations and quotation omitted). The request was not received by the RAO until October 25, 2021. *See Fernandes v. Craine*, 534 Fed.Appx. 274, 275 (4th Cir. 2013 Fed. R. App Pro. 32.1 Dec.) (District Court’s denial of motion to extend time vacated, as lawyer did not learn of District Court Judgment because email notifying him of judgement went to his junk file). This interpretation is in keeping with the purpose of the Legislature to give the RAO a reasonable time to assess the Public Record Request and make a meaningful assessment of it and determine whether responding to it “unduly burdens the other responsibilities of the agency.” G.L. c. 66, §10(b). The facts of this matter demonstrate the Legislature’s wisdom.

The Requestor demands that the agency provide 11,000 emails covering more than a two-year period knowing that they contain personal information protected by statute. It would be impossible for the agency, made up of three support staff, six hearing officers and six mediators, to produce a response to the request without ignoring their regular duties. They would be unable to provide any services to the students, parents and school districts that rely on them. In an effort to meet the Legislature’s goals of transparency in state government while avoiding an undue burden on the agency’s other responsibilities, the agency made several proposals to the Requestor that would have provided it with the records it sought. The Requestor chose to ignore the proposals despite the serious impact its demands would have on the quality of the services the agency provides.

For the reasons stated above, the agency asks that the Supervisor of Records DENY the appeal. The agency is willing to provide the records sought in accordance with one of the proposals set out in its letter dated December 20, 2021, but the Requestor should inform the agency how it wants to proceed and, if applicable, agree to pay the reasonable costs associated with the response.

Very truly yours,



Edward B. McGrath
Chief Administrative Magistrate

Cc. Commonwealth Transparency



Search Mass.gov

SEARCH

How to Request a Public Record from the Division of Administrative Law Appeals

Learn who the Records Access Officer is and the ways you can make your request.

Online Public Records Request Form

[\(/forms/request-a-new-record-dala\)](/forms/request-a-new-record-dala)

THE DETAILS

CONTACT

What you need

The Division of Administrative Law Appeals (DALA) encourages you to use our online form to make a public records request (PRR) of DALA's Office or the Bureau of Special Education Appeals (BSEA) Office. This helps to ensure the most expeditious and accurate response to your request. Otherwise, written requests may be delivered by hand, mail, email or fax (if available). While requests for public records may be made orally in person to an RAO, such requests may not be the subject of an appeal. Telephone requests may be accepted at the discretion of the RAO.

DALA/BSEA has designated the following employee as the Primary Records Access Officer (RAO) who will assist requesters in fulfilling their requests.

Edward McGrath, Primary RAO
Title: Chief Magistrate

Division of Administrative Law Appeals

Phone

(781) 397-4700 (tel:7813974700)
Open M-F 9am-5pm

Online

[Staff Directory](/lists/dala-staff-directory)
[\(/lists/dala-staff-directory\)](/lists/dala-staff-directory)

How to request

Online

Please use our [online form](/forms/request-a-new-record-dala) (</forms/request-a-new-record-dala>)

By phone

You may call (781) 397-4700 and ask for the Records Access Officer

By mail

You may mail your request to:

Edward McGrath, Primary RAO
Chief Magistrate
14 Summer Street, 4th Floor
Malden, MA 02148

By fax

You may fax your request to the attention of the Records Access Officer at (781) 397-4720

In person

You may hand deliver your request to:

Division of Administrative Law Appeals (DALA)
ATTN: Records Access Officer
14 Summer Street, 4th Floor
Malden, MA 02148

More info

We encourage the public to submit written requests whenever possible. If an oral request is necessary, please call (781) 397-4700 and ask for the Records Access Officer.

Questions regarding how to file a public records request or the status of a public records request can be made via email at edward.mcgrath@mass.gov (<mailto:edward.mcgrath@mass.gov>) or by calling (781) 397-4700.

Contact

Division of Administrative Law Appeals

Address

14 Summer Street, 4th floor, Malden, MA 02148

Directions (<https://maps.google.com/?q=14+Summer+Street%2C+4th+floor%2C+Malden%2C+MA+02148>)

Phone

(781) 397-4700 (tel:7813974700)
Open M-F 9am-5pm

Online

Staff Directory (</lists/dala-staff-directory>)


Fax


(781) 397-4720

LOCATION DATA

 [United States](#)

TOP CITIES

 [Des Moines, United States](#)

 [San Antonio, United States](#)

OWNER DETAILS

DOMAIN [outlook.com](#)

HOSTNAME [opencommonwealth-org.mail.protection.outlook.com](#)

 NETWORK OWNER [Microsoft Corporation](#)

CONTENT DETAILS

 CONTENT CATEGORY [Infrastructure and Content Delivery Networks](#)

Think these category details are incorrect?

 [Submit a Web Categorization Ticket](#)



ADDITIONAL INFORMATION

- [IP ADDRESSES](#)
- [WHOIS](#)
- [EMAIL VOLUME HISTORY](#)
- [TOP NETWORK OWNERS](#)

REPUTATION DETAILS

 EMAIL REPUTATION -

 WEB REPUTATION  Trusted

	LAST DAY	LAST MONTH
 EMAIL VOLUME	0	0
 VOLUME CHANGE	0%	

Think these reputation details are incorrect?

 [Submit a Web & Email Reputation Ticket](#)

BLOCK LISTS

TALOS SECURITY INTELLIGENCE BLOCK LIST

ADDED TO BLOCK LIST No

Top IP Addresses used to send emails in opencommonwealth-org.mail.protection.outlook.com

IP ADDRESS	HOSTNAME	FWD/REV DNS MATCH	LAST DAY VOL.	LAST MONTH VOL.	BLOCK LISTS	EMAIL REP.
104.47.56.110	opencommonwealth-org.mail.protection.outlook.com	Yes	4.1	4.4	0	● Favorable
104.47.51.110	opencommonwealth-org.mail.protection.outlook.com	Yes	4.2	4.4	0	Favorable

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- Home
- About
- Contact
- Spam Data
- Web Data
- BRBL
 - About
 - Request Access
 - Log In
 - Listing Methodology
 - [Removal Request](#)
 - How to Use

- Lookups**
- Feedback
- Report Issues
- Our Websites:
 - Barracuda Networks

IP / Domain Lookups

Barracuda Reputation

Barracuda Central maintains a history of IP addresses for both known spammers as well as senders with good email practices. This information contributes to the Barracuda Reputation System, which gives the Barracuda Spam & Virus Firewall the ability to block or allow a message based on the sender's IP address. In addition to IP reputation, the Barracuda Central team maintains reputation on URLs, which gives the Barracuda Spam & Virus Firewall the ability to quickly block an email based on a poorly-rated URL contained in the message. By combining both the IP and reputation data, Barracuda Networks can easily determine whether a message is spam or legitimate email. Once identified, Barracuda Central can implement countermeasures to mitigate these threats.

Barracuda Reputation is one of the many techniques Barracuda Networks employs within the Barracuda Spam & Virus Firewall to reinforce its superior 95 percent spam accuracy rate.

Reputation Lookup

The domain name **open commonwealth.org** is not listed on Barracuda's Intent Block List.
 The domain **open commonwealth.org** does not exist in our WebFilter content database. Please help us categorize this domain by [submitting](#) its category to us.

IP or Domain:

The Barracuda Reputation System is a real-time database of IP addresses that have a "poor" reputation for sending valid emails. Barracuda Central maintains and manually verifies all IP addresses marked as "poor" on the Barracuda Reputation System.

[Why is my IP listed on the Barracuda Reputation System?](#)



Customer URL Ticketing System

Check Single URL

McAfee® provides an online tool that enables you to check if a site is categorized within various versions of the SmartFilter Internet Database or the Webwasher URL Filter Database. After you check a URL, this tool also allows you to suggest an alternative categorization for a site. These requests will be addressed within an average of 3-5 business days with some requests requiring additional review and taking longer.

Please select the product you are using. Selecting the appropriate product will provide the correct categorization information to be displayed for you.

Please type in a URL to look up the categorization.

Categorization in URL Filter database version '450926'

URL	Status	Categorization	Reputation
https://opencommonwealth. ...	Categorized URL	- Government/Military	Minimal Risk

To suggest changes you may select up to 3 categories which you feel are a more accurate reflection of the risk and content for this site. Please note: anonymous submissions may or may not get reviewed in a timely manner. To ensure a prompt response, please create an account.

For specific concerns or questions on the reputation - please submit an email to sites@mcafee.com. Please list the URL you are inquiring about, list its current reputation, and why you disagree with it.

Optional categorization suggestion:

Category 1

Category 2

Category 3

Optional comment:

Note: this Web-based service is designed for occasional use by individuals. If you have hundreds or thousand of URLs you would like to test, please write to us about your needs. Most often, we can provide timely analysis of your request. If we see heavy use of this Web-based service by automated programs, we reserve the right to deny access.

Please email us at sites@mcafee.com and we will gladly work with you.

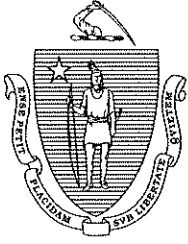
Customer URL Ticketing System

- [Check Single URL](#)
- [Check URL List File](#)
- [Track URL Ticket Status](#)
- [TrustedSource Web Database Reference Guide](#)
- [Submit BotnetCC URL](#)

Login

[Register](#)

[Forgot your password?](#)



THE COMMONWEALTH OF MASSACHUSETTS

DIVISION OF ADMINISTRATIVE LAW APPEALS

14 SUMMER STREET, 4TH FLOOR

MALDEN, MA 02148

EDWARD B. McGRATH
CHIEF ADMINISTRATIVE MAGISTRATE

TEL: 781-397-4700

FAX: 781-397-4720

www.mass.gov/dala

November 22, 2021

Info@OpenCommonwealth.com

Re. Your Public Record request

Dear Requestor,

This responds to your public records request received by this Office on October 7, 2021.

Your request seeks the following records: "For the time period January 1, 2019 through the date, you respond with all responsive documents, please provide the following; Any and all electronic mail and/or text messages between the BSEA (inclusive of all BSEA employees, administration and contractors) and anyone at the @mhtl.com email domain."

We are actively working on this request but due to fact that there could be more than 11,000 responsive records (including duplicates) and our responsibility to review the documents in house to remove students' and parents' personally identifying information as required by M.G.L. c. 71B § 2A(b), it is a time-consuming task. *See* G.L. c. 4, §7 (26)(c). We currently expect to produce responsive records that have been completed within two weeks and will provide a firm date for completion of the full request at that time. We do not expect to charge any fees to respond to this request at this time and will let you know if our expectation changes.

We appreciate your patience. Please do not hesitate to reach out to me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Edward B. McGrath".

Edward B. McGrath
Chief Administrative Magistrate

cc. pre@sec.state.ma.us SPR21/2784



THE COMMONWEALTH OF MASSACHUSETTS

DIVISION OF ADMINISTRATIVE LAW APPEALS

14 SUMMER STREET, 4TH FLOOR

MALDEN, MA 02148

EDWARD B. McGRATH
CHIEF ADMINISTRATIVE MAGISTRATE

TEL: 781-397-4700

FAX: 781-397-4720

www.mass.gov/dala

December 6, 2021

Info@OpenCommonwealth.com

Re. Your Public Record request

Dear Requestor,


This will update our response dated November 22, 2021 to your public records request received by this Office on October 7, 2021. That request seeks the following records: "For the time period January 1, 2019 through the date, you respond with all responsive documents, please provide the following; Any and all electronic mail and/or text messages between the BSEA (inclusive of all BSEA employees, administration and contractors) and anyone at the @mhtl.com email domain."

We have obtained approximately 11,000 emails and divided them into 15 batches. It is taking much longer than I expected to redact the personally identifying information of the students and parents contained in the emails and protected by M.G.L. c. 71B § 2A(b). I have spent about 12 hours so far redacting protected information and I am only halfway through Batch 1. I expect to complete redacting Batch 1 on or before December 20, 2021. There will be no charge for Batch 1.

I ask that, after I provide the response containing Batch 1, you review the data and consider modifying your request. Perhaps you could ask for a random sample of the data so that we would not have to review all 11,000 emails. If you are unable to modify your request so that we can complete the request inhouse, we will have to make other arrangements to respond to your request. If that is necessary, we expect we will charge \$25.00 an hour to complete the task.

We appreciate your patience. Please do not hesitate to reach out to me if you have any questions.

Very truly yours,


Edward B. McGrath
Chief Administrative Magistrate

cc. pre@sec.state.ma.us SPR21/2784

Subject: Relayed: Public records request under the Massachusetts Public Records Law M.G.L. c66, § 10
Date: Thursday, October 7, 2021 at 12:35:49 AM Eastern Daylight Time
From: Microsoft Outlook
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@ShermanGilnerPCLLO.onmicrosoft.>
To: edward.mcgrath@mass.gov <edward.mcgrath@mass.gov>
Attachments: Public records request under the Massachusetts Public Records Law M.G.L. c66, § 10.eml

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

edward.mcgrath@mass.gov (edward.mcgrath@mass.gov)

Subject: Public records request under the Massachusetts Public Records Law M.G.L. c66, § 10

From: Commonwealth Transparency <info@opencommonwealth.org>
To: "edward.mcgrath@mass.gov" <edward.mcgrath@mass.gov>
Subject: Public records request under the Massachusetts Public Records Law

M.G.L. c66, § 10

Thread-Topic: Public records request under the Massachusetts Public Records

Law M.G.L. c66, § 10

Thread-Index: AQHXuyHyuKde09t1TEuvj0+sZFAU/KvG8pKN

Importance: high

X-Priority: 1

Disposition-Notification-To: Commonwealth Transparency
<info@opencommonwealth.org>

Return-Receipt-To: <info@opencommonwealth.org>

Date: Thu, 7 Oct 2021 04:35:44 +0000

Message-ID:

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In-Reply-To:

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Content-Language: en-US

X-MS-Has-Attach: yes

X-MS-Exchange-Organization-SCL: -1

X-MS-TNEF-Correlator:

X-MS-Exchange-Organization-RecordReviewCfmType: 0

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Content-Type: text/plain; charset="iso-8859-1"

Content-Transfer-Encoding: quoted-printable

Greetings:

This is a formal public records request under the Massachusetts Public Records Law M.G.L. c66, § 10:

For the time period January 1, 2019 through the date, you respond with all responsive documents, please provide the following;

Any and all electronic mail and/or text messages between the BSEA (inclusive of all BSEA employees, administration and contractors) and anyone at the @mhtl.com email domain.

This request specifically seeks electronic versions of responsive documents. If any responsive documents exist in a non-electronic format, please include an estimate of the actual costs to scan the documents and provide them electronically.

Please provide all responsive documents electronically to the email address info@opencommonwealth.org

This request seeks responsive documents in the format in which they are regularly maintained, including any and all electronic mail metadata. This request and all responsive documents are for express purposes of gathering information to promote citizen oversight and further the public understanding of the operation and activities of your school.

Kindest Regards,

OpenCommonwealth.org

--_000_DM5PR03MB316368E06ABA0B42D098D56DBAB19DM5PR03MB3163namp_
Content-Type: text/html; charset="iso-8859-1"
Content-Transfer-Encoding: quoted-printable

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<p class=3D"p1"><o:p>&nbsp;</o:p></p>
<p class=3D"p1">This is a formal public records request under the
Massachus=
etts Public Records Law M.G.L. c66, =A7 10:<o:p></o:p></p>
<p class=3D"p1"><o:p>&nbsp;</o:p></p>
<p class=3D"p1">For the time period January 1, 2019 through the date,
you r=
espond with all responsive documents, please provide the
following;<o:p></o=
:p></p>
<p class=3D"p1"><o:p>&nbsp;</o:p></p>
<p class=3D"p1" style=3D"margin-left:.5in">Any and all electronic mail
and/=
or text messages between the BSEA (inclusive of all BSEA<o:p></o:p></
p>
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and co=
ntractors) and anyone at the @mhtl.com email domain.<o:p></o:p></p>
<p class=3D"p1"><o:p>&nbsp;</o:p></p>
<p class=3D"p1">This request specifically seeks electronic versions of
resp=
onsive documents. If any responsive documents exist in a non-
electronic for=
mat, please include an estimate of the actual costs to scan the
documents a=
nd provide them electronically.<o:p></o:p></p>
<p class=3D"p1"><o:p>&nbsp;</o:p></p>
```

Please provide all responsive documents electronically to the email address info@opencommonwealth.org

This request seeks responsive documents in the format in which they are regularly maintained, including any and all electronic mail metadata. This request and all responsive documents are for express purposes of gathering information to promote citizen oversight and further the public understanding of the operations and activities of your school.

Kindest Regards,

OpenCommonwealth.org

--_000_DM5PR03MB316368E06ABA0B42D098D56DBAB19DM5PR03MB3163namp_--

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size=49945;
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VKME78h6kMHH8bQyoz
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