



The City of Worcester

Law Department

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Jenna Clemenzi, Esq.
Staff Attorney
Public Records Division
Office of the Secretary of the Commonwealth

Joey Ford
Parent Data Force

VIA EMAIL

RE: W091663-070926/ SPR26/2861

Dear Attorney Clemenzi and Mr. Ford,

I am writing on behalf of the City of Worcester (City) to provide a supplemental response to Mr. Ford's July 9, 2026, public records request and the appeal of the City's response to that request which has been assigned case number SPR26/2861 by the Public Records Division.

As an initial matter, I wish to express my appreciation for Mr. Ford's willingness to work with this Office to produce records in an efficient and affordable manner. Specifically in multiple telephone conversations with this Office, Mr. Ford has expressed a willingness to narrow the date range of the records sought to cover only the last three school years and accept completely de-identified data which represents the overarching number of approved and denied transfer requests across the district rather than data which is broken down across the over forty schools in the district. In turn, this Office anticipates providing Mr. Ford with a sample of the most recent iteration of the requested data to ensure that it will satisfy his request. I look forward to continuing to communicate with Mr. Ford to resolve any remaining concerns which he may have after the City's production of the agreed upon sample of data.

I also wish to provide a revised fee estimate for Mr. Ford's request as currently constructed. Upon review of a sample of the requested data, I have learned that only a portion of the requested records will require the cell by cell review described in the City's July 23, 2026, response. Columns of the data such as student first name, student last name, parent first name, parent last name, student date of birth and student ID number will be withheld in their entirety from the dataset as required by Family Educational Rights and Privacy Act (FERPA) as it operates through Exemption (a) of the Public

Records Law. While fields such as: the school from where the transfer request originates, the desired transfer location and student grade can likely be provided without requiring individual review for redaction. However, the field which contains the reason for transfer request does require individualized review for redaction. This field provides the listed reason for a transfer request for a Worcester Public Schools student. This field can contain a reason as innocuous as “better special education services”, contain data which directly identifies a student by name or contain a detailed description of circumstances which, in combination with factor such as grade level and school, would serve to indirectly identify the student to whom the transfer request regards. It is for this reason that the City asserts segregation and redaction of this field is required by law pursuant to FERPA as it operates through Exemption (a). The City understands that it has not been granted permission to assess fees for segregation and redaction not required by Law. See SPR26/2850 Determination of the Supervisor of Records (July 31, 2026). Please note that the City respectfully disagrees with the Supervisor’s findings that its petition was not submitted in a timely manner and reserves the right to request reconsideration at a later date. In light of new information provided to this Office as well as arguments made in Mr. Ford’s appeal, I wish to provide a modification/reduction of the City’s previous fee estimate.

The City anticipates that there are approximately 40,454 cells of data which require individualized redactions. Please note these cells of data only represent the column which contains the reason for transfer request. This data is spread across an estimated 430 separate Microsoft Excel spreadsheets each representing an individual school’s transfer requests in a given year and one spreadsheet per year which contains district wide data. In an attempt to honor Mr. Ford’s request that he not be provided with a cell-based estimate, I can further estimate that there are 27 cells per page of data resulting in an estimated 1,498 pages of data. I anticipate that it will require a member of the City’s public records team approximately two minutes and fifteen seconds to redact each page of data. The reason for the increase in estimated time to redact per page is that, as described in the City’s initial estimate, to successfully redact the data, the City must move cell by cell to each transfer request. Further as opposed to redacting pages of data which share similar subject matter, each transfer request details separate case by case circumstances from which the request arose necessitating a careful review and redaction to ensure that a student’s right to privacy which is mandated by FERPA is not pierced via Public Records Request.

At this time, the City respectfully stands by the estimated one minute per page to redact the estimated 1,350 pages of records responsive to item 3 of the request at issue.

Based on a careful and thorough review of the sample data provided to this Office and Mr. Ford’s appeal petition, I provide a revised fee estimate as follows:

≈ 1,498 pages of Excel Data (items one and two) of data X 2.25 minutes per page = 3,370.5 minutes (56.17 hours)

≈1,350 pages of responsive records (item three) X 1 minute per page = 1,350 minutes (22.5 hours)

Total Estimated Hours of Labor = 78.67

-2 hours for free labor as required by Law

76.67 hours X \$25.00 per hour = **\$1,916.75**

I understand that despite the substantial reduction in estimated cost that the City's fee estimate continues to be extensive. As discussed in my conversations with Mr. Ford in conjunction with the extensive tasks required to fulfill Mr. Ford's original request, the City is unable to offer a waiver of fees at this time. However, I am happy to continue to work with Mr. Ford to cement modifications to the request at issue which will allow the City to meaningfully reduce or eliminate the above fee estimate. Thank you for your respective reviews and consideration in this matter.

Sincerely,
Michael Manning

Records Access Officer
City of Worcester Law Department