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February 18, 2026

Via email only lauriegaddis@gmail.com

Dear Ms. Gaddis-Barrett:

The Foster Glocester Regional School District is in receipt of your January 17, 2026, APRA request, and given its complexity I have been asked as legal counsel to respond. Your request is as follows:

Pursuant to the Rhode Island Access to Public Records Act (APRA), I request copies of any and all written agreements, memoranda of understanding (MOUs), intergovernmental agreements, service-sharing agreements, contracts, or other formal or informal written instruments currently in effect or in effect at any time since January 1, 2020, between or involving the Foster-Glocester Regional School District, the Glocester School Committee (K-5), the Towns of Foster or Glocester, and/or third-party vendors, to the extent such records govern, describe, or reference shared services or resources related to any of the following:

1. Email systems, including but not limited to email domains, hosting, storage, archiving, retention, access controls, administrative privileges, and cost allocation.
2. Information technology (IT) staff or technology services, including shared personnel, contractors, support services, supervision, cost-sharing, or budgeting arrangements.
3. Student information systems, including any platforms or systems used to collect, store, access, transmit, or manage student records or student data.
4. Records retention responsibilities, including designation of the legal custodian of records, retention schedules, storage, destruction, and compliance with state records retention requirements.

This request includes executed agreements, draft agreements, addenda, renewals, amendments, policies incorporated by reference, and any correspondence or records centrally maintained by district administration, legal counsel, finance, or information technology offices that memorialize or formalize such arrangements.

Electronic production is requested.

Due to the extraordinary breadth and voluminous nature of your request, the District exercised its right to extend the ten (10) business-day response period by an additional twenty (20) business days pursuant to R.I. Gen. Laws § 38-2-3(e).

The wording of your request is the most extensive and obtuse the District and I have ever encountered. The District's IT department has determined that it is likely that your request was AI-generated to capture the broadest possible terms and close every possible loophole. But the APRA requires that the District must respond to the request as submitted. See *Solas v. South Kingstown School Department* PR22-26 ("It is the requester's responsibility to frame requests with sufficient particularity to ensure that searches are not unreasonably burdensome, and to enable the searching agency to determine precisely what records are being requested")

Therefore, the District's IT department conducted the following search:

A series of targeted Google Vault queries aligned to the request's four subject areas (Email systems; IT staff/technology services; Student Information Systems; Records retention), plus a shared-services "between entities" query. Below are the queries used and the resulting email counts from Vault. Please note: these counts represent the number of messages returned by Vault for each query. They are not deduplicated across queries (a single email may match more than one query), and the counts include both responsive and potentially non-responsive material that would still require review to confirm applicability and to apply any required redactions or exemptions.

A) Base "Agreement / Instrument" Terms (broad baseline)

Query: ("contract" OR "agreement" OR "MOU" OR "memorandum of understanding" OR "intergovernmental" OR "service sharing" OR "shared services" OR "scope of work" OR "SOW" OR "master services agreement" OR "MSA" OR "statement of work" OR "renewal" OR "amendment" OR "addendum" OR "extension" OR "RFP" OR "proposal" OR "quote" OR "terms and conditions")

Result count: 1,535,181 emails

B) Bucket 1 - Email Systems Email Query 1 (governance/admin/permissions):

("contract" OR "agreement" OR "MOU" OR "SOW" OR "MSA" OR "renewal" OR "amendment") AND ("email" OR "mailbox" OR "domain" OR "MX record" OR "Google Workspace" OR "G Suite" OR "Microsoft 365" OR "Office 365" OR "Exchange" OR "admin console" OR "super admin" OR "administrator privileges" OR "retention" OR "vault" OR "archiving" OR "eDiscovery")

Result count: 403,258 emails

Email Query 2 (cost allocation/billing): ("contract" OR "agreement" OR "MOU" OR "SOW" OR "MSA" OR "invoice" OR "billing" OR "renewal") AND ("Google Workspace" OR "Microsoft 365" OR "Office 365" OR "email") AND ("cost" OR "allocation" OR "chargeback" OR "reimbursement" OR "split" OR "shared" OR "portion" OR "budget")

Result count: 125,899 emails

- C) Bucket 2 - IT Staff / Technology Services IT Services Query 1 (managed services/support): ("contract" OR "agreement" OR "MOU" OR "SOW" OR "MSA" OR "renewal" OR "amendment") AND ("IT services" OR "managed services" OR "MSP" OR "help desk" OR "helpdesk" OR "support services" OR "service desk" OR "network support" OR "systems administrator" OR "technology coordinator" OR "technology director" OR "on-site support" OR "remote support")

Result count: 35,032 emails

IT Services Query 2 (shared personnel/supervision): ("MOU" OR "memorandum of understanding" OR "intergovernmental" OR "service sharing" OR "shared services" OR "shared personnel" OR "cost sharing") AND ("technology" OR "IT" OR "network" OR "systems" OR "helpdesk" OR "support")

Result count: 10,855 emails

IT Services Query 3 (budgeting/cost sharing): ("agreement" OR "MOU" OR "service sharing" OR "shared services" OR "reimbursement" OR "invoice") AND ("technology" OR "IT" OR "support") AND ("budget" OR "cost" OR "allocation" OR "chargeback" OR "split" OR "portion")

Result count: 85,437 emails

- D) Bucket 3 - Student Information Systems (SIS) SIS Query 1 (general SIS platform): ("contract" OR "agreement" OR "SOW" OR "MSA" OR "renewal" OR "amendment") AND ("student information system" OR "SIS" OR "student records" OR "student data" OR "enrollment" OR "gradebook" OR "attendance")

Result count: 56,770 emails

SIS Query 2 (privacy/data sharing/FERPA): ("contract" OR "agreement" OR "data sharing" OR "data privacy" OR "DPA" OR "FERPA") AND ("SIS" OR "student data" OR "student records" OR "directory information")

Result count: 15,959 emails

SIS Vendor-name query: ("Aspen") AND ("contract" OR "agreement" OR "renewal" OR "SOW" OR "MSA")

Result count: 17,288 emails

- E) Bucket 4 - Records Retention Responsibilities
Retention Query 1 (retention/custodian): ("retention" OR "records retention" OR "legal custodian" OR "custodian of records" OR "record schedule" OR "retention schedule") AND ("agreement" OR "MOU" OR "policy" OR "procedure" OR "protocol" OR "guidance")

Result count: 25,791 emails

Retention Query 2 (storage/destruction/legal hold): ("records" OR "public records" OR "APRA" OR "FOIA" OR "legal hold" OR "litigation hold" OR "destruction" OR "dispose" OR "purge") AND ("retention" OR "schedule" OR "archive" OR "vault")

Result count: 51,423 emails

F) Shared Services Between Entities (Regional / K-5 / Town)

Entity-sharing query: ("Foster" OR "Glocester" OR "regional" OR "K-5" OR "school committee" OR "town") AND ("intergovernmental" OR "MOU" OR "memorandum of understanding" OR "service sharing" OR "shared services" OR "cost sharing" OR "reimbursement") AND ("technology" OR "IT" OR "email" OR "SIS" OR "records" OR "retention")

Result count: 27,169 emails

All Tech Contracts Only ("Vendor 1" OR "Vendor 2" OR".....") AND ("contract" OR "agreement" OR "MOU" OR "memorandum of understanding" OR "intergovernmental" OR "service sharing" OR "shared services" OR "scope of work" OR "SOW" OR "master services agreement" OR "MSA" OR "statement of work" OR "renewal" OR "amendment" OR "addendum" OR "extension" OR "RFP" OR "proposal" OR "quote" OR "terms and conditions")

Result count: 27,917

Total emails including the first broad query is 2,417,979

Total emails excluding the first broad search 882,798

Each of these emails (and the attachments) would have to be reviewed to determine if they are responsive to your APRA request. Any responsive emails would then have to be reviewed to determine if there is any information that the District is not allowed to release or that is otherwise exempt from APRA disclosure. The District would also have to determine if such information may be removed by redaction or whether the entire email should be withheld. Finally, to the extent that emails should be produced with redaction, the District would have to redact each of these emails before production.

The District is authorized pursuant to R.I. Gen. Laws § 38-2-4, to charge fifteen dollars (\$15.00) per hour spent responding to an APRA request, with no cost charged for the first hour. Further, the District is authorized to charge a prepayment estimate in this amount before undertaking the work to produce the records. See *Saunders v. Rhode Island Division of Lotteries*, PR 15-10. In accordance with R.I. Gen. Laws § 38-2-7(b), from the time a prepayment estimate is issued until the time the prepayment estimate is paid, the time for responding to your APRA request is tolled and will not begin to run again until the estimate is prepaid.

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Some of the emails you request may be exempt from disclosure under the APRA. These emails would still need to be reviewed, however, to determine which emails fall within an APRA exemption. The \$15-per-hour charge is made with “no reference to the amount of documents produced and instead is calculated according to the time a public body expends searching and retrieving documents.” See *Duxbury v. Town of Coventry*, PR13-16. Accordingly, the District is authorized to charge \$15 per hour even for reviewing emails that are ultimately not produced to you.

Due to the substantial amount of work entailed in reviewing all of these communications, withholding as necessary, redacting as necessary, and producing the records to you, the District is charging you a prepayment estimate. Based on a preliminary review of these emails, it is estimated that it would take two minutes per email for review, potential redaction, and production. The Rhode Island Attorney General has held that a prepayment estimate of two minutes per email is not an unreasonable charge under the APRA. See *Jerry Transparency v. City of Providence*, PR19-29.

For the initial broad search which resulted in 2,417,979 emails, it is estimated that it would take 80,599.3 hours to review, potentially redact, and produce all of these emails. With a single hour of free search and retrieval time for this request, this entails a prepayment estimate of One Million Two Hundred Eight Thousand Nine Hundred Seventy-Four Dollars and Fifty Cents (\$1,208,974.50) Excluding the first broad search yielded 882,798 emails, which would take 29,426.6 hours to review, potentially redact, and produce all of these emails. With a single hour of free search and retrieval time for this request, this entails a prepayment estimate of Four Hundred Forty-One Thousand Three Hundred Eighty-Four Dollars (\$441,384). We recognize that these estimates are patently absurd, however, so is the language of your request.

You are free to resubmit your APRA request with a narrower scope. You may wish to consider using direct, simple language and not an AI program which makes your request unintelligible. If you withdraw and resubmit your request with a narrower scope, the District will reconsider the prepayment estimate and extended response deadline as necessary.

In accordance with R.I. Gen. Laws § 38-2-8, you may file an appeal with the Department of the Attorney General, 150 South Main Street, Providence, Rhode Island, 02903, or the Rhode Island Superior Court of the county where the record(s) are maintained. You may also access additional information concerning the Access to Public Records Act through the Attorney General’s website at www.riag.ri.gov.

Thank you for your interest in keeping government open and accountable to the public.

Very truly yours,



Gregory P. Piccirilli