

## **Coppin State University Public Information Act (PIA) Policy**

**Purpose:** To provide guidance to Coppin State University (CSU) faculty and staff on the handling of Maryland Public Information Act requests to facilitate appropriate and timely public access to records maintained by Coppin State University.

**Policy:** It is the policy of Coppin State University that the PIA Representative, in consultation with Counsel, will work in good faith to produce documents responsive to requests, after those documents are reviewed for legal redactions permissible under the Maryland Public Information Act, as well as other applicable laws and regulations.

### **Procedures**

#### **I. PIA Contact/Representative**

- a. The contact information for the PIA Contact shall be posted in a user-friendly format on the Coppin State University website, and shall include PIA Contact:
  - i. Name
  - ii. Business phone number
  - iii. Email address
- b. PIA Contact information shall be updated by the Office of Information Technology whenever a change occurs.

#### **II. Designation of immediately available records**

- a. Coppin State University will designate types of public records that can be made available to any applicant within 10 business days under the Maryland Public Information Act.

#### **III. Submitting Public Information Act Requests**

- a. Requestors shall submit requests for public records in writing to the PIA Contact by sending to the contact listed on the CSU website.

- b. Faculty and staff who receive a PIA request shall send PIA requests immediately to the PIA Contact

#### IV. Initial Request Screening

- a. Upon receipt of a request, the PIA Contact shall determine whether the request seeks records previously designated as immediately available.
- b. If a request for records not immediately available is made orally, the PIA Contact will notify the applicant within 10 business days, in writing or by email, to provide a written request that clearly identifies the records sought by the applicant.
- c. The PIA Contact shall review the PIA request to determine whether it presents any of the following issues:
  - i. If the PIA request covers records that are **not in the University's custody**, the PIA Representative will notify the applicant within 10 business days in writing or by email, and refer the applicant to the actual records custodian, if known.
  - ii. If the PIA request is **unclear or overly broad**, the PIA Contact should contact the applicant within 10 business days to clarify or narrow the PIA request.
  - iii. If the PIA request covers **existing and disclosable records that will take more than 10 business days to produce**, the PIA Contact will notify the applicant, in writing or by email, within 10 business days:
    - 1. fulfilling the request will take up to 30 business days unless the applicant agrees to more time; and
    - 2. the reason additional time is required.

#### V. Responding to PIA Requests

- a. If the University has the records and can find those covered by the PIA request after a reasonable search, the PIA Contact shall work with relevant faculty/staff to promptly retrieve the records.
- b. The PIA Contact and Counsel shall work to review the records to determine whether any PIA exemptions apply and whether the records must be redacted before making them available.

- c. The PIA Contact shall draft the proposed responses to any PIA requests, which may be finalized only after the draft has been reviewed and approved by Legal Counsel and/or Chief of Staff.
- d. Once it has been determined that records are to be disclosed, the PIA Contact should notify the applicant within 10 or 30 business days, in writing, that the records are available for inspection or copying.
- e. If records are to be withheld in whole or in part, and thus the PIA request denied in whole or in part, the PIA Contact shall immediately notify the applicant and send the applicant a letter within 10 business days of that determination. The letter shall include:
  - 1. the reasons for the withholding;
  - 2. the legal authority for the withholding;
  - 3. and notice of the remedies for review of the withholding.
- f. The University shall respond to a PIA request within 30 calendar days or less - unless the applicant agrees to extend the period for response where additional gathering time is required.
- g. If the response to the PIA request is voluminous, discuss a mutually agreeable schedule for disclosure.

## **VI. Copies**

- a. If the applicant seeks copies of documents, the PIA Representative shall provide them within a reasonable time.
- b. If copies are requested in an electronic or other special format, the PIA Representative should honor that request if it is possible to do so without significant cost or burden on the University.
  - i. Whenever possible, electronic documents should be distributed in PDF format.
  - ii. The PIA Contact should consider whether metadata should be removed from an electronic copy that is to be provided to the applicant.

## **VII. Fees**

- a. According to (GP 4-206 A): *beyond the two hours provided to the requester at no cost, agencies are not expected to provide further search and preparation time without an assurance that the requester will cover the government's costs.*

- b. Search and preparation fee: The University may charge reasonable fees in a manner consistent with the practices and regulations of other University System of Maryland colleges and universities, for actual time expended for the search, preparation, legal review, and reproduction for records to the fullest extent permitted by law.
- c. Copy fee: For requests that produce over 100 pages of work product, CSU may charge a fee of \$0.25 per page.
- d. In cases where requests are extensive, the PIA Contact may provide an estimate of fees and request prepayment before completing the response, based on the estimated time and resources required to complete the request.
- e. The PIA Representative, when certain statutory circumstances are present, may waive a fee associated with generating a response to a PIA request.

#### **VIII. PIA Request Record**

- a. The PIA Representative shall maintain a log of all PIA requests submitted to the University, which will capture the following information:
  - i. date PIA request was received;
  - ii. name of requestor;
  - iii. contact information of requestor;
  - iv. information requested;
  - v. University response (approved/denied);
  - vi. reason PIA request was denied;
  - vii. date requestor was notified PIA request was denied;
  - viii. name of staff member providing requested information;
  - ix. data source;
  - x. query used to produce requested information;
  - xi. date PIA response was approved by Chief of Staff;
  - xii. date information was sent to the requestor.