



PULLMAN COMMUNITY MONTESSORI

PUBLIC RECORDS REQUEST POLICY AND PROCEDURES

Pullman Community Montessori (“PCM”) is a public local agency in Washington State and is subject to the [Washington Public Records Act](#), which addresses access to public records while preventing excessive interference with other essential functions of PCM. As such, PCM’s public records include any writing that is prepared, owned, used, or retained, and which contains information that relates to the conduct of government, or the performance of any governmental or proprietary function.

PCM is required to respond to public records requests pursuant to [chapter 42.56 RCW](#). PCM is not required to respond to questions, do research, or provide information that is not an identifiable public record, nor to opine on the intent of the parties contemporaneously involved with [identifiable public records](#).

In March 2024, the former Head of School, who served as Public Records Officer (“PRO”), was placed on administrative leave. The Board Chair assumed the role of Public Records Officer in an *ad hoc* capacity, pending the return or replacement of the Head of School.

On May 31, 2024, the Washington Charter School Commission voted to revoke PCM’s charter, precipitating closure of the school after its 2023-24 fiscal year. As a result, staffing has been substantially reduced, adversely affecting the availability of personnel to fulfill public records requests (“PRRs”) without undue burden on the school’s other remaining business activities. Furthermore, the school is insolvent, leaving scant resource for outsourcing of PRR fulfillment, including legal review.

In consequence, while PCM will fulfill PRRs pursuant to the Public Records Act, such requests will enter a queue whose scheduling will depend on the nature, volume, and availability of the requested records, as well as the complexity of the request. See following section *Categories of Requests*.

Definitions

“Public record” includes any writing containing information relating to the conduct of PCM or any function owned, used, or retained by PCM.

“Writing” means handwritten, typed, printed, photocopied, and every other means of recording any form of communication including, but not limited to, letters, words, images, video recordings, and similar documents subject to, and limited by, [RCW 42.56.010\(4\)](#).

“Identifiable record” means an identifiable record extant at the time of the PRR and that PCM staff or contractors can locate after a reasonable search.

“Exempt records” that are exempted from disclosure by federal or state law. In the event that an otherwise permissible record contains exempted information, the identified record may be redacted.

Responsibility

PCM’s PRO is the volunteer Chair of the Board in lieu of now-absent paid management staff. The PRO will accept, record, tabulate, and monitor PRRs and will request searches for identifiable records from PCM staff or contractors. Within 5 business days of receiving a PRR, the PRO will acknowledge receipt of the request and provide a reasonable estimate for fulfillment of the request, or will deny exempt portions of the request, or will request clarification from the requestor. In

the event the PRO is unable to respond within 5 business days, they may designate the Treasurer of the Board as temporary PRO.

Searches for identifiable records related to PCM financial accounting will be conducted by existing PCM contractors. Contractors will conduct searches within PCM's instance of *Quickbooks* and directly-related document repositories, and will provide identifiable records to the PRO in accordance with the following section *Categorization of Requests*.

Searches for documents located at PCM's office (such as physical written matter) or directly managed by PCM staff (such as e-mail) will be conducted by PCM's sole remaining staff member, without adversely affecting PCM's other ongoing activities related to compliance and wind-down. Identifiable records will be provided to requestors in accordance with the following section *Categorization of Requests*.

Due to its fiscal status and wind-down, PCM is unable to procure and compensate additional resources for fulfillment of PRRs.

Categorization of Requests

Requests will be categorized as either "immediate" or "complex."

Immediate PRRs are those which refer to documents that are immediately available, of a common nature. Responsive documents will be provided by an employee or contractor to the PRO no sooner than one week after acknowledgement of the request to the requestor, and no later than one month following acknowledgement. Examples include invoices from specific vendors, and e-mails with specific senders and/or receivers within specific, short time frames.

Complex PRRs are those which are of an expansive or all-inclusive nature, or those with limited available methods for searching records, or with potentially high numbers of records implicated, or which involve the rights of third parties, those with need for legal review, those with need for clarification, require time needed for review of exemptions, and other such relevant circumstances. Complex PRRs will be prioritized in the order received, with expected fulfillment times dependent on available resources. Examples of complex PRRs include all vendor invoices related to a particular activity, and e-mails with broad keyword searches or multiple senders/receivers.

When PCM receives a request of which portions are unclear or do not refer to specific identifiable records, PCM will request clarification. If the requestor is unable or unwilling to help narrow the scope of requested records in order to expedite PCM's response and/or reduce the volume of potentially responsive documents, PCM will deny those portions of the request, but will fulfill portions that are clear.

While [regulatory guidelines](#) allow for assessment of monetary compensation for fulfillment of PRRs, PCM does not currently levy such charges. If incremental resources are required for searches, reviews, and responses, however, PCM may determine appropriate charges and require payment in advance of providing responsive records.

Preservation of Public Records

Physical records located in PCM's Pullman offices will be retained therein only so long as PCM's lease remains in effect, currently anticipated to endure through mid- to late-July 2024. Prior to loss of leased office space, PCM anticipates shipment of physical records to the Washington State Charter Commission, and release of online credentials necessary for searches of virtual records such as e-mail.

Virtual records located in PCM's instance of Quickbooks and directly-related accounting document repositories will be retained by PCM's contractor so long as PCM's 501(c)3 organization endures. Upon its dissolution, PCM anticipates making virtual records available to the Washington State Charter Commission for storage in its IT infrastructure.

This policy will remain in force until it is superseded, or repealed, or the 501(c)3 organization is dissolved.