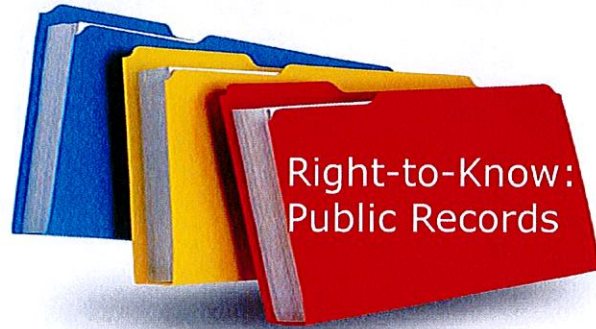


Public
Records

NEW HAMPSHIRE MUNICIPAL ASSOCIATION

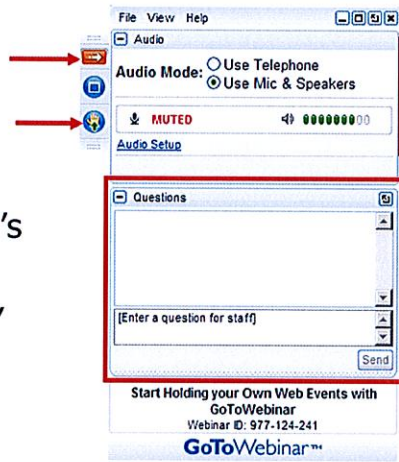


Presented by
Stephen Buckley, Legal Services Counsel
Margaret Byrnes, Staff Attorney

May 11, 2016

How to Participate Today

- Open and close your Panel
- Submit text questions
- Q&A addressed during and at the end of today's session
- Couple of "Pop Quizzes" today!



Today's Agenda



1. New case!
2. Confidential, commercial, financial
3. Notes or materials for personal use
4. Preliminary drafts/not in final form
5. Minutes, focus on nonpublic sessions



Let's review some basics first

91-A:1-a, III

A "governmental record" is any information:

created accepted, or obtained	By, or on behalf of: • any public body, or • a quorum or majority thereof, or • any public agency	In furtherance of its official function
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NHMA

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Only governmental records can be subject to disclosure under the Right to Know law ("RTK"), so start by determining whether the record is a governmental record.

Under **91-A:1-a**, a *governmental record* is:

1. Any information
 - a. created
 - b. accepted, or
 - c. obtained
2. By, or on behalf of,
 - a. any public body, or a quorum or majority thereof or
 - b. any public agency
3. in furtherance of its official function

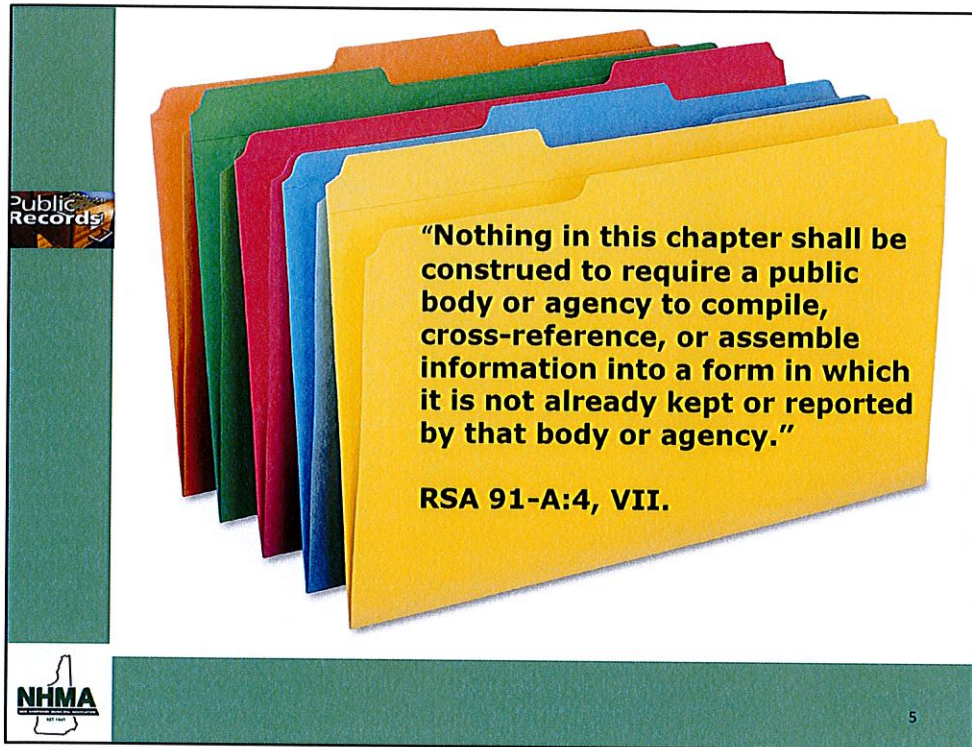
It includes any written communication or other information, whether in paper, electronic, or other physical form, received by a quorum or majority of a public body in furtherance of its official function, whether at a meeting or outside a meeting of the body.

The information must be a record; it must exist in some ascertainable form.

→ 91-A:1-a, IV. "Information" means knowledge, opinions,

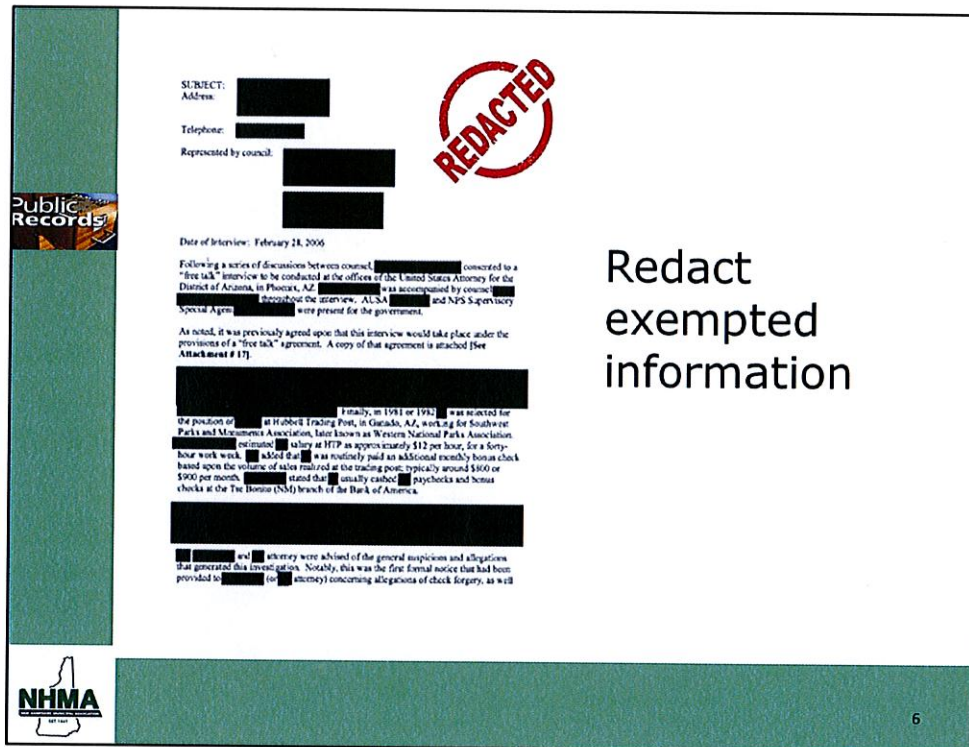
facts, or data of any kind and in whatever physical form kept or maintained, including, but not limited to, written, aural, visual, electronic, or other physical form.)

The term "governmental records" includes the term "public records."



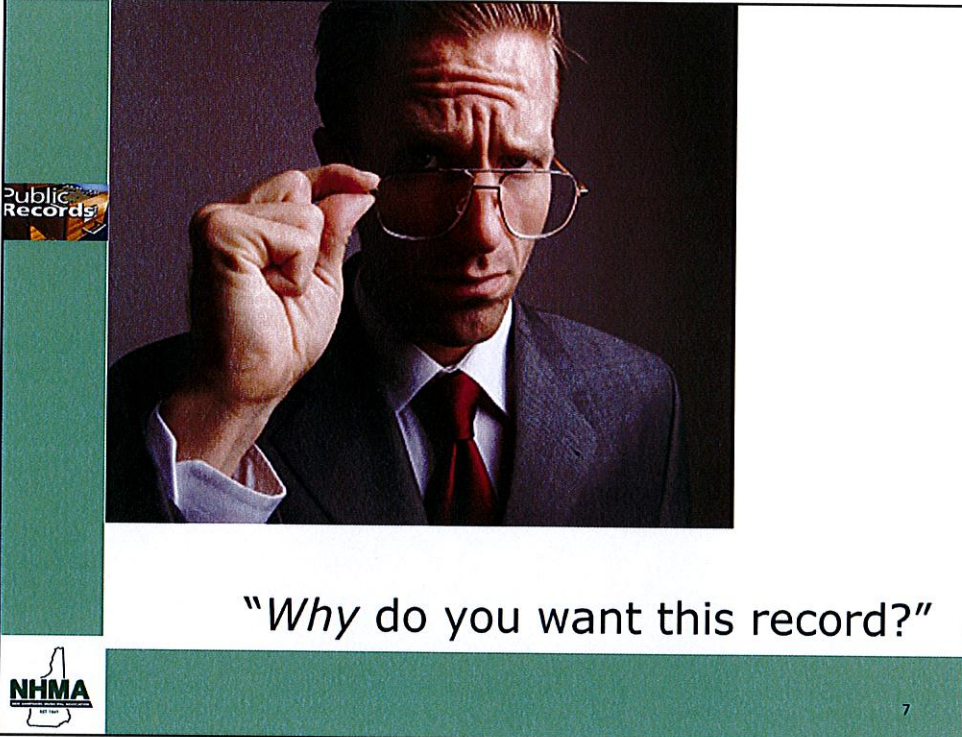
The Right-to-Know Law doesn't require you to create a record that does not already exist.

Brent v. Paquette, 132 N.H. 415, 426(1989): 91-A does not require public officials to retrieve and compile into a list random information gathered from numerous documents, if a list of this information does not already exist. In *Brent*, the information requested was contained on registration cards, but there was actually no list. The school district did not have an obligation to create such a list.



Even though the record itself may need to be disclosed, the record may contain information that is exempt from disclosure. If it does contain such information, redact that information before you disclose the document. Do not withhold the entire record just because it contains information that should not be disclosed.

Redaction may be accomplished manually by copying the document and then covering the sections to be redacted on the copy with ink, for example using a black marker. Alternatively, a piece of white redaction tape can be used to cover the sections of the copy to be redacted. The redacted copy is then copied, with the person making the request receiving that second generation copy. If ink is used, it is important to check the second generation copy to ensure the redaction effectively blocks the non-public information. The quality of some copiers makes it necessary to use very heavy application of ink, redaction tape, or to make a third generation copy.



Public
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"Why do you want this record?"

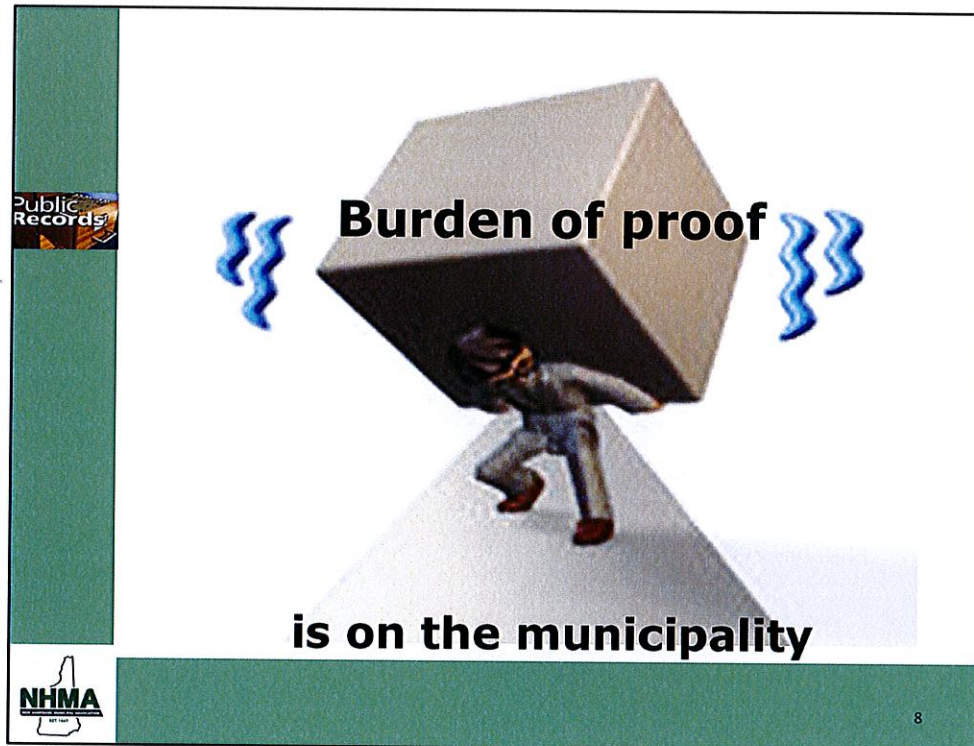
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. . . Is a question you can never ask! (And should not be considered when deciding whether to disclose requested information)

Mans v. Lebanon School Board, 112 N.H. 160 (1972):

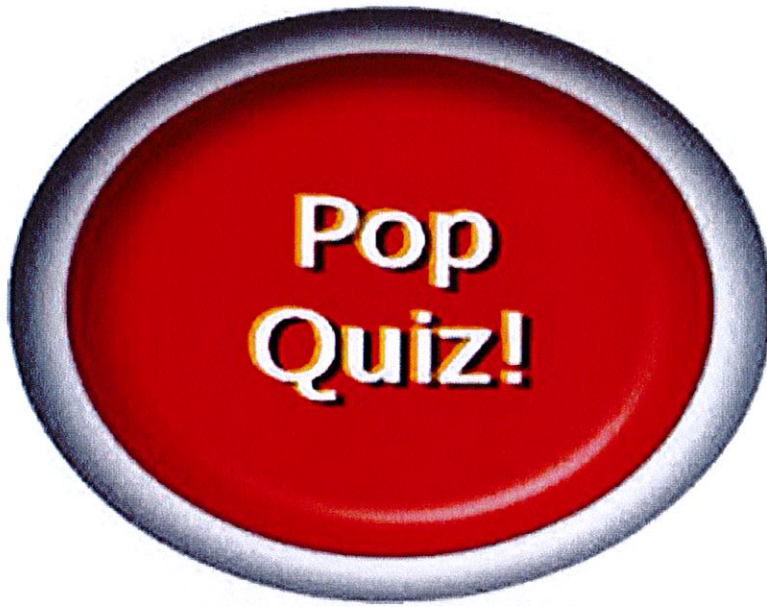
A citizen does not have to offer a reason or demonstrate a need to inspect a governmental record. If a record is public, it must be disclosed regardless of the motive for the request. The issue is always whether "the public should have the information" not whether the particular requesting party should have the information.



In all cases, the public body bears the burden of proving that a record is not subject to public release. An agency must meet a minimum threshold to justify non-disclosure. It "is not required, however, to justify its refusal on a document-by-document basis. When generic determinations are used, the withholding should be justified category of document by category-of-document not file-by-file." *Murray v. State Police*, 154 N.H. 579, 583 (2006).

With redacted information within a disclosed document, explain (at least generally) why the information is redacted (i.e., exempted from disclosure).

Public
Records

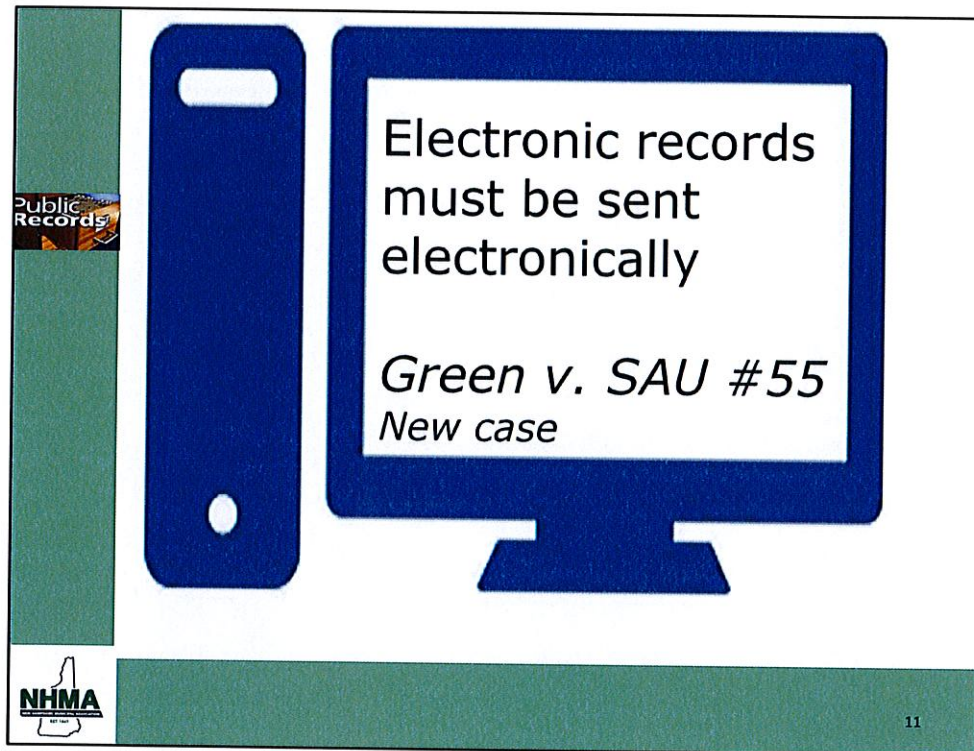




What New Hampshire town has also been known as Naticook, Brenton's Farm and Dunstable?

- A. Londonderry**
- B. Lyman**
- C. Litchfield**
- D. Lebanon**
- E. Lee**







Facts:

- School board member made a Right-to-Know Law request for various records from the SAU
- Records existed in electronic form.
- SAU responded that the board member could come in to “see” the documents, and so the board member instead requested that the records be sent electronically. SAU refused.
- The “original” format of these records was the electronic form
- There was no evidence that the SAU could not send them electronically
- NH Supreme Court said when records exist electronically, the individual requests to receive them electronically, and it is reasonably practical to do so (e.g., the records can be emailed), the municipality must send them electronically.
- However, this case does not appear to require municipalities to create electronic copies of records that do not already exist electronically (e.g., only exist on paper).

NHMA Court Update and full case can be found [here!](#)



IV. Records pertaining to internal personnel practices; **confidential, commercial, or financial information**; test questions, scoring keys, and other examination data used to administer a licensing examination, examination for employment, or academic examinations; and personnel, medical, welfare, library user, videotape sale or rental, and other files whose disclosure would constitute invasion of privacy.


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RSA 91-A:5, IV

Public Records

What is *confidential* information?

What is the **potential harm** that will result from disclosure?



NHMA

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Goode v. New Hampshire Office of Legislative Budget Assistant, 148 N.H. 551, 554-55 (2002):

- To show that information is sufficiently confidential to justify nondisclosure, the party resisting disclosure must prove that disclosure is likely: (1) to impair the State's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained.
- As this test illustrates, "the emphasis should be placed on the **potential harm** that will result from disclosure, rather than simply promises of confidentiality, or whether the information has customarily been regarded as confidential." The burden of proving whether information is confidential rests with the party seeking non-disclosure.

Union Leader Corp. v. New Hampshire Hous. Fin. Auth., 142 N.H. 540 (1997): Place emphasis on the potential harm that will result from nondisclosure or whether the information has customarily been regarded as confidential.

Attorney-client privilege: Confidential records include records protected under attorney-client privilege, even if the document is circulated to a quorum of the board. Privilege can be lost if information in record is disclosed to parties not a party to the attorney-client relationship or if the body/agency discusses the record, unless counsel is present.

From the attorney general's memo, on confidential records:

Confidential Information. The public body must have a basis for invoking the exemption and may not simply mark a document "confidential" in an attempt to circumvent disclosure. In determining whether a governmental record must be disclosed, "the emphasis should be placed on the potential harm that will result from disclosure, rather than simply promises of confidentiality, or whether the information has customarily been regarded as confidential." *Goode v. LBA*, 148 N.H. 551, 554-55 (2002). To best effectuate the purposes of the Right-to-Know law, whether information is "confidential" must be determined objectively, and not based on the subjective expectations of the party generating it. See *Professional Firefighters of N.H. v. Local Gov't Ctr., Inc.*, 159 N.H. 699, 709 (2010) (while employees of public body may not have expected their salary information to be made public, that does not make the information confidential under the Right-to-Know law). Except when the result is plainly established by the Right-to-Know law itself, courts analyzing whether a "confidential" government record should be disclosed will apply a test which balances the benefits of public disclosure against the benefits of non-disclosure in construing the scope of RSA 91-A:4 and RSA 91-A:5.

In *Union Leader Corp. v. Fenniman*, 136 N.H. 624 (1993), the Court held that a balancing test would be inappropriate where the legislative history was clear that internal police investigatory files were "records pertaining to internal personnel practices, which are categorically exempt from disclosure." In *Goode v. LBA*, 148 N.H. 551 (2002), the Court held that "while . . . 'work papers' is a category of confidential information under RSA 91-A:5, IV, there must be a balancing test applied to determine whether they are sufficiently confidential to justify non-disclosure." In *Union Leader Corp. v. City of Nashua*, 141 N.H. 473 (1996), the Court held that the motives of a particular party seeking disclosure are irrelevant when conducting the balancing test between the public's interest in disclosure and a private citizen's interests in privacy. There is a presumption in favor of disclosure and when no privacy interest is involved, disclosure is mandated. However,

the general public must have a legitimate interest in the information and disclosure must serve the purpose of informing the public about the activities of the government. The New Hampshire Supreme Court adopted the United States Supreme Court's view that disclosure of information about private citizens in government files that reveals nothing about an agency's conduct is not within the purpose of the Right-to-Know law. *Lamy v. NH Public Utilities Commission*, 152 N.H. 106 (2005) (the names and addresses of PSNH's residential customers are private and disclosure does not inform the public about the conduct of the PUC. However, PSNH's business customers do not have a privacy interest and their names and addresses must be disclosed under the Right-to-Know law.); *Professional Firefighters of N.H. v. Local Gov't Ctr., Inc.*, 159 N.H. 699, 709-10 (2010) (employers' names and salary information provides insight into the operations of the entity and must be disclosed); see also *U.S. Dept. of Justice v. Reporters Committee*, 489 U.S. 749, 773 (1989). When release of records may cause an invasion of privacy, an ex parte in-camera review of the records by a court is appropriate. *Union Leader Corp.*, 141 N.H. at 478.

Your town has a wastewater treatment plant (WWTP) with industrial users connected to the system. NHDES and EPA permitting of the WWTP require industrial users pre-treat their waste and enumerate constituent chemicals in their particular waste stream as part of an Industrial Discharge Permit (IDP) issued by the town. Industrial User A manufactures silicon-based computer components that use unique, proprietary compounds that must be described at length in the IDP for the town. Industrial User B, a competitor of Industrial User A asks for a copy of Industrial User A's IDP.



Commercial/Financial Information

- Municipality is in possession of financial/commercial information from a private entity (e.g. tax abatement request from shopping center, contains income-related information)
- Example above: information is proprietary and would affect User A's competitive edge/give User B a competitive advantage
- Similar to the test for confidentiality because the focus is on the harm caused if the information is disclosed
- 91-A:3, II(j): Consideration of confidential, commercial, or financial information that is exempt from public disclosure under RSA 91-A:5, IV in an adjudicative proceeding pursuant to RSA 541 or RSA 541-A.
 - RSA 541 or RSA 541-A = proceeding before state agency governed by the administrative procedure act

VIII. Any notes or other materials made for **personal use** that do **not** have **an official purpose**, including but not limited to, notes and materials made prior to, during, or after a governmental proceeding.

91-A:5, VIII

- ATV Watch v. N.H. Dept. of Transportation*, 161 N.H. 746 (2011):
- Handwritten personal notes in margins of letters were redacted
 - Court said notes were properly withheld
 - Any notes or other materials made for personal use that do not have an official purpose, including notes and materials made prior to, during, or after a public proceeding. RSA 91-A:5, VII.
 - Court rejected argument that all notes and materials that bear on an agency's business must be disclosed; "official purpose" is narrower than "bearing on the agency's business"



PRELIMINARY

DRAFT

IX. **Preliminary** drafts, notes, and memoranda and other documents **not in their final form** and **not disclosed**, circulated, or available to a **quorum** or a **majority** of the members of a public body.

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91-A:5, IX

This applies to

1. Preliminary drafts, notes, and memoranda and other documents
2. not in their final form
3. and not disclosed, circulated, or available to a quorum or a majority

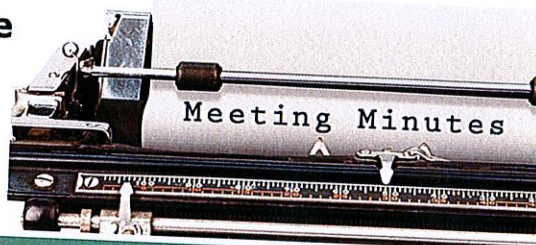
ATV Watch v. N.H. Dept. of Transportation, 161 N.H. 746, 758 (2011):

- ATV Watch had requested governmental records from DOT related to motorized use of certain NH trails
- DOT responded, but withheld, among other things, preliminary draft correspondence
- Court held that draft letters from DOT to other agencies were properly withheld as preliminary drafts
- This exemption is meant to protect "pre-decisional, deliberative communications that are part of an agency's decision-making process [and] the distinction between preliminary and final documents does not consist of the extent to which the person or persons from whom they originate expect to alter them."
- Court also rejected argument that disclosure to another agency invalidates the exemption.

Minutes: The Basics



- 1. All meetings**
- 2. Required content**
- 3. Availability**
- 4. Documents use compiling**



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You must take minutes of non-public sessions.

What must minutes contain?

1. Names of members present,
2. Names of persons appearing before the public body, and
3. "a brief description of the subject matter discussed and final decisions."

Availability requirements:

Public : 5 days, 91-A:2, II

Nonpublic: 72 hours if not sealed, 91-A:3, III

91-A:2, II. (Excerpt) Minutes of all such meetings, including names of members, persons appearing before the public bodies, and a brief description of the subject matter discussed and final decisions, shall be promptly recorded and open to public inspection not more than 5 business days after the meeting, except as provided in RSA 91-A:6, and shall be treated as permanent records of any public body, or any subordinate body thereof, without exception.

91-A:4, I. Every citizen during the regular or business hours of all public bodies or agencies, and on the regular business premises of

such public bodies or agencies, has the right to inspect all governmental records in the possession, custody, or control of such public bodies or agencies, including minutes of meetings of the public bodies, and to copy and make memoranda or abstracts of the records or minutes so inspected, except as otherwise prohibited by statute or RSA 91-A:5. In this section, "to copy" means the reproduction of original records by whatever method, including but not limited to photography, photostatic copy, printing, or electronic or tape recording.

91-A:4, II. After the completion of a meeting of a public body, every citizen, during the regular or business hours of such public body, and on the regular business premises of such public body, has the right to inspect all notes, materials, tapes, or other sources used for compiling the minutes of such meetings, and to make memoranda or abstracts or to copy such notes, materials, tapes, or sources inspected, except as otherwise prohibited by statute or RSA 91-A:5.

33-A:3-a, LXXX. Meeting minutes, tape recordings: keep until written record is approved at meeting. As soon as minutes are approved, either reuse the tape or dispose of the tape.

How to "seal" nonpublic session minutes



- ✓ Disclosure would adversely affect the reputation of a person other than a member of the board;
- ✓ Disclosure would render the proposed action ineffective; or
- ✓ The discussion in the minutes pertains to terrorism.

There's technically no such thing as "sealing" minutes. What you are doing is making them "not available" to the public.

Remember that the only permissible reasons for sealing the minutes are:

- Disclosure would adversely affect the reputation of a person other than a member of the board;
- Disclosure would render the proposed action ineffective; or
- The discussion in the minutes pertains to terrorism.

- If none of these conditions exist, the minutes may not be sealed.
- There is no need to vote not to seal the minutes; in the absence of a vote, the minutes are automatically not sealed, and must be available to the public within 72 hours
- Remember also that the motion to seal the minutes must specifically cite one of the reasons noted above, and requires the affirmative vote of two-thirds of those present. Do not confuse this with the motion to enter non-public session, which must be by roll call but requires only a simple majority.

Pop Quiz!

What New Hampshire town has also been known as "Poplin?"



- A. Farmington
- B. Freedom
- C. Fitzwilliam
- D. Fremont
- E. Franconia



When should we seal the minutes?



"The board reviewed and discussed the applicants for the vacancy on the planning board. After discussion, Mr. Jones moved to appoint Jane Roe to the position. Ms. Smith seconded the motion, and the motion passed unanimously."

OR

"The board received an update on the litigation involving John Doe. No decisions were made."



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- In many cases, the issues around the sealing of minutes can be avoided by keeping very simple minutes that do not contain confidential information. If there is nothing confidential or inflammatory in the minutes, then there probably is no reason to seal them, and a problem is avoided.
- In the first example above, there really is no need to include a detailed explanation of why the board liked or disliked the various candidates. In the second example, no purpose would be served by describing all of the questions that were asked or the strategic discussions about the litigation.
- Of course, more detailed minutes will be necessary in some circumstances, and there may be occasions when inclusion of confidential discussions is unavoidable; but think about this, and have a discussion about how much detail should be included before leaving non-public session.

“Unsealing” Minutes

Public
Records



“. . . Information may be withheld until, in the opinion of a majority of the board, the aforesaid circumstances no longer apply. ”



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- Non-public minutes must be made available to the public unless the board determines that certain circumstances apply.
- If the board makes that determination, the minutes “may be withheld until, in the opinion of a majority of the board, the aforesaid circumstances no longer apply.” Thus, a vote to “seal the minutes” is merely a vote that the minutes will not be made available upon request until the board decides otherwise.
- A vote by the board to seal them for a specific period (or forever) is not conclusive, because the board may decide later that the circumstances justifying confidentiality no longer exist, and they should be made public.
- It is a good practice for a board to review its sealed minutes regularly—probably at least once a year—to determine whether the circumstances that justified their sealing still apply.
- The board could also designate one board member to regularly review sealed minutes and report back to the board.
- If someone makes a request to inspect sealed minutes, the response should not be simply, “Sorry, those minutes are sealed.” Unless they are very recent minutes and it is clear that the circumstances have not changed, the board should review the minutes to decide whether the circumstances that justified withholding them in the first place still apply.

When might certain types of minutes be ready to be “unsealed”?

(a) The dismissal, promotion, or compensation of any public employee or the

disciplining of such employee, or the investigation of any charges against him or her: It will be the very rare case that an employee disciplinary matter would ever be cleansed of the potential for reputation injury such that public disclosure would be warranted.

(b) The hiring of any person as a public employee. The person who is hired and her salary and benefits would certainly be public information that could be disclosed, but it would be necessary to keep non-public the names of those who were not hired especially if those applicants did not want to tip off their current employers they were looking for a new job.

(c) Matters which, if discussed in public, would likely affect adversely the reputation of any person: Reputation loss is much like an employee disciplinary matter, in that it would be the rare case the taint of possible libel would be dissipated. What if the matter has become public or the person has died?

(d) Consideration of the acquisition, sale, or lease of real or personal property which, if discussed in public, would likely benefit a party or parties whose interests are adverse to those of the general community: Once the property negotiation is completed disclosure should be permitted.

(e) Consideration or negotiation of pending claims or litigation which has been threatened in writing or filed against the public body or any subdivision thereof, or against any member thereof because of his or her membership in such public body, until the claim or litigation has been fully adjudicated or otherwise settled: Once the litigation is resolved with no further need to restrict access to legal theories and advice, such minutes could be disclosed.

Can we “seal” them *after* the meeting?

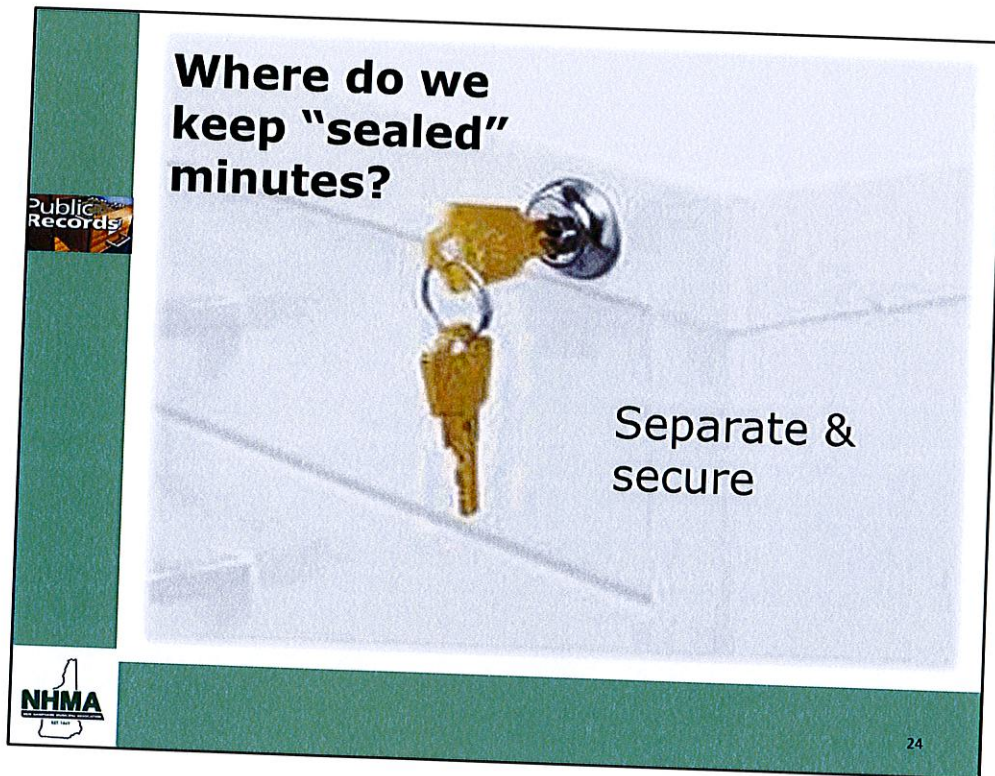


- Less than 72 hours
- Not released
- After 72 hours?



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- Yes, if they haven't been released to anyone. The law requires that non-public minutes be “publicly disclosed within 72 hours” unless the board votes to seal them. It says nothing about when the board needs to vote to seal them. Thus, the board certainly can vote anytime within 72 hours to seal the minutes if they have not already been disclosed.
- Even after 72 hours, an argument can be made that the minutes may be sealed if they have not actually been provided to anyone, although the law is not clear on this. It is unclear what “publicly disclosed” means, but presumably it is the same as the general requirement that all minutes be “open to public inspection.” If the minutes have been available upon request, but no one has actually requested them, and if they have not been posted in a public place (which is not required), perhaps they can still be sealed. But the board should consult with its legal counsel before taking such an action.



Keep them separate.

This probably is obvious—the non-public session minutes should be a separate document from the public session minutes. The public session minutes should state that the board entered non-public session at a specific time (and include the motion, the basis for the motion, and the roll call vote on the motion), and then indicate that the board returned to public session at a specific time.

Store them securely.

- Sealed minutes must be kept permanently.
- They should be stored in a secure location, preferably a locked drawer or cabinet where only the board and its representative can get access.
- It is recommended to keep all of the board's sealed minutes together, arranged by date, and clearly marked as minutes that are not available to the public.

Who can read "sealed" minutes?

Public
Records



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Situation: A new person has been elected to the board, and wants to review all of the board's sealed minutes. Or, a former board member wants to review the sealed minutes from when he was a member. Should this be permitted?

- They are the board's minutes. So long as they remain sealed, they are subject to review only by the board. A new board member has the same rights as other current board members, but if one or more board members want to review the minutes, it is better to make the minutes available to the entire board at a meeting and then return them to their secure location. Alternatively, the board may vote to authorize individual members to review the sealed minutes.
- A former board member has no right to see minutes that remain sealed. It does not matter that he was on the board at the time of the non-public session; he is no longer on the board and has no more right than a member of the general public.

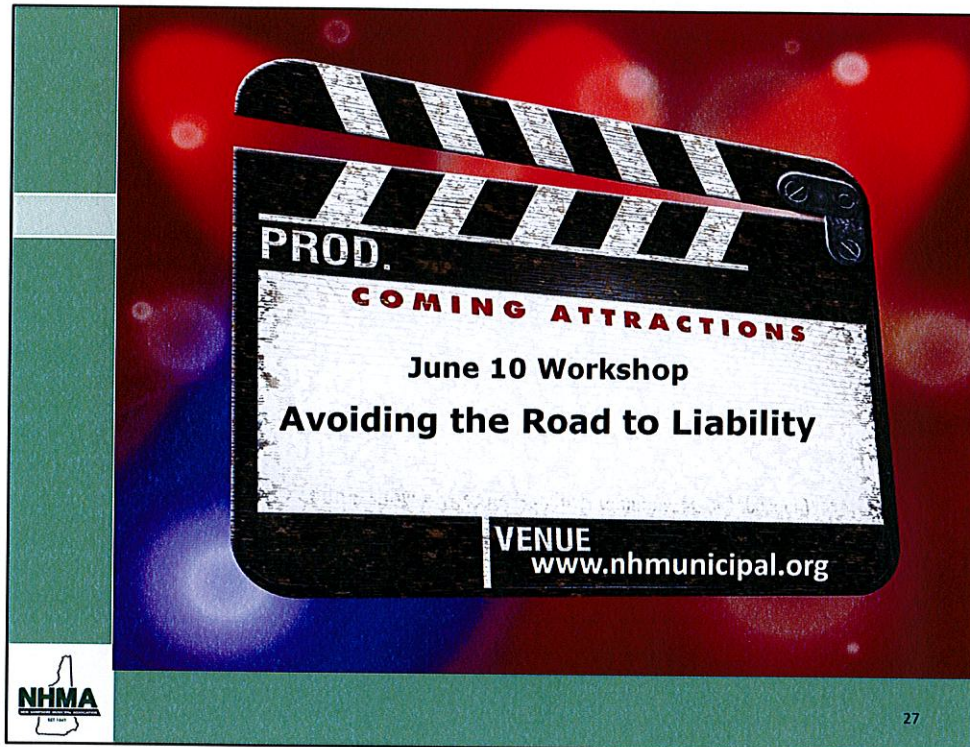


Join Government Affairs Counsel Cordell Johnston and Government Finance Advisor Barbara Reid for a review of the highlights of the 2016 legislative session. This will be several weeks after the legislative session ends, so except for possible vetoes, all legislative action will be final.

This webinar will discuss the most significant bills of municipal interest that made it through the legislature this year, as well as a few that failed but may be back in the future. The discussion will include, among others, state aid grants for water and wastewater facilities, assessing issues, planning and zoning, the Right-to-Know law, municipal liability, election laws, and various other changes affecting municipal governance and administration.

This webinar is open to members of the New Hampshire Municipal Association. **Registration deadline is noontime, June 7, 2016.**

[REGISTER HERE!](#)



With the 2015 revision of *A Hard Road to Travel* as a backdrop, this workshop will explore the law related to liability, regulation, and maintenance of municipal roads. Join NHMA Staff Attorney Margaret Byrnes and Attorney Christine Fillmore of Gardner, Fulton & Waugh, PLLC, for an in-depth review of these important areas, including updates in the law since the 2004 publication. There will be a particular focus on several areas that frequently create questions: ATVs, snowmobiles, and OHRVs; erecting gates and bars on Class VI roads; inclement weather policies; road insufficiencies; driveways and drainage; weight limits; and "No-Thru Trucking" designations. The workshop will include "real-life" scenarios for discussion and a Q&A session with the attorneys.

Presented by:

*Margaret M.L. Byrnes, Staff Attorney, NH Municipal Association
C. Christine Fillmore, Esquire, Gardner Fulton & Waugh P.L.L.C.*

Attendees will receive a copy of the 2015 edition of *A Hard Road To Travel*. Workshop runs from 9:00 a.m. - 12:00 p.m. Registration and continental breakfast start at 8:30 a.m.


[REGISTER HERE!](#)

Workshop registration, including 2015 edition of *A Hard Road to Travel*: \$90

Workshop registration only (no publication): \$45

Pre-registration is required one week prior to the workshop.

If you register and do not attend, you will be invoiced \$45 to cover the cost of meals and materials.



2016 Local Officials Workshops

Workshops for seasoned and new municipal officials and employees of New Hampshire Municipal Association member towns.


Dates and Locations	Agenda
<p>Saturday, April 9 Jaffrey Civic Center 40 Main Street, Jaffrey</p> <p>Wednesday, April 13 Grantham Town Hall 300 Route 10 South, Grantham <i>*Sponsored by Primex*</i></p> <p>Wednesday, April 27 Hudson Community Center 12 Lions Ave., Hudson <i>*Sponsored by Davis & Towle*</i></p> <p>Thursday, May 19 McIntyre Building, Auditorium, 16 Highland Street, Whitefield</p> <p>Wednesday, May 25 Carroll County Complex, Delegation/Commissioner Conference Rm 95 Water Village Rd., Ossipee <i>*Sponsored by Primex*</i></p> <p>Saturday, June 4 25 Triangle Park Drive, Concord <i>*Sponsored by Davis & Towle*</i></p>	<p style="text-align: center;">9:00 a.m.— 4:00 p.m. Continental breakfast and lunch will be provided. <i>Registration and breakfast begins at 8:30 a.m.</i></p> <p style="text-align: center;">Overview</p> <p>Presented by NHMA's Legal Services attorneys, the workshops provide newly elected and appointed municipal officials with tools and information to effectively serve their communities. Topics will include the Right-to-Know Law, ethics and conflicts, town governance, public employment, liability and more. Interactive discussions will offer an opportunity to test scenarios, discuss concerns, ask questions and share ideas.</p> <p>Attendees will receive a complimentary copy of NHMA's 2016 edition of publication, <i>Knowing the Territory</i>.</p>

No Fee, On-line Registration Required!

To register online, please visit www.nhmunicipal.org and click on the Calendar of Events. Space is limited!

Cancellation must be received 48 hours in advance. If cancellation is not received 48 hours in advance, NHMA will invoice you for \$20 to cover workshop costs, including meals.

Questions? Please call 800.852.3358, ext. 3350 or email NHMAregistrations@nhmunicipal.org.



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The Local Officials Workshop is for newly elected and appointed municipal officials and other members of the New Hampshire Municipal Association and will be presented by the NHMA's Legal Services attorneys.

This workshop will provide municipal officials with tools and information to effectively serve their communities. Topics will include the Right-to-Know Law, ethics and conflicts, town governance, public employment, liability and more. Interactive discussions will offer an opportunity to test scenarios, discuss concerns, ask questions and share ideas. Attendees will receive a complimentary copy of the NHMA's 2016 edition publication, *Knowing the Territory*.

Registration and continental breakfast begin at 8:30 a.m. Lunch will be provided.

No registration fee and online pre-registration is required. Space is limited.

[REGISTER HERE!](#)

Visit NHMA's Anniversary Webpage:
www.nhmunicipal.org/anniversary





THANK
YOU

*for attending
our webinar
presentation
today!*

Mission Statement

The New Hampshire Municipal Association is a non-profit, non-partisan association working to strengthen New Hampshire cities and towns and their ability to serve the public as a member-funded, member-governed and member-driven association since 1941. We serve as a resource for information, education and legal services. NHMA is a strong, clear voice advocating for New Hampshire municipal interests.

