

**City of Frankfort, Michigan**  
**Freedom of Information Act Procedures and Guidelines**

City of Frankfort FOIA Coordinator  
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*Consistent with the Michigan Freedom of Information Act, MCL 15.231 et seq. (FOIA), it is the policy of the City of Frankfort that all persons, except those incarcerated, are entitled to full and complete information regarding the affairs of government and the official acts of those who represent them as public officials and employees, so that they may fully participate in the democratic process.*

**Preamble: Statement of Principles**

The City's policy with respect to FOIA requests is to comply with the laws of the State of Michigan in all respects and to respond to FOIA requests in a consistent, fair, and even-handed manner, regardless of who makes such a request.

The City acknowledges that it has a legal obligation to disclose all nonexempt public records in its possession pursuant to a FOIA request. The City acknowledges that sometimes it is necessary to invoke the exemptions identified under FOIA in order to ensure the effective operation of government and to protect the privacy of individuals.

The City will protect the public's interest in disclosure, while balancing the requirement to withhold or redact portions of certain records. The City's policy is to disclose public records consistent with and in compliance with State law.

The City Council has established the following written procedures and guidelines to implement the FOIA and will create a written public summary of the specific procedures and guidelines relevant to the general public regarding how to submit written FOIA requests and explaining how to understand a public body's written responses, deposit requirements, fee calculations, and avenues for challenge and appeal. To the extent possible, the written public summary will be written in such a manner that it may be easily understood by the general public.

**Section 1: General Policies**

The City Council, acting pursuant to the authority at MCL 15.236, designates the City Clerk and Treasurer as the FOIA Coordinator. Consistent with the FOIA and with these Procedures and Guidelines, the FOIA Coordinator is authorized to accept and process written requests for the City's public records; to issue notices of extension; to estimate and calculate fees and deposits; to approve or deny FOIA requests as he or she deems appropriate; to accept appeals of denials or required fees; to make minor changes to the City's FOIA forms (e.g., request, extension, denial, and appeal forms, etc.); and generally to carry out the requirements and intent of the FOIA and these Procedures and Guidelines on the City Council's behalf. The FOIA Coordinator may also designate other City staff to act on his or her behalf to accept and process written requests for the City's public records, and to approve denials.

If a request for a public record is received by fax, email, or other electronic means, the request is deemed to have been received on the following business day. If a request is sent by email and is automatically delivered to a City spam or junk-mail folder, the request is not deemed received until one day after the FOIA Coordinator first becomes aware of the request. The FOIA Coordinator shall note in a City FOIA log both the date the request was delivered to the spam or junk-mail folder and the date the FOIA Coordinator became aware of the request. The FOIA Coordinator shall review City spam and junk-mail folders on a regular basis, which shall be no less than once a month. The FOIA Coordinator shall work with City Information Technology staff to develop administrative rules for handling spam and junk-mail so as to protect City systems from computer attacks which may be imbedded in an electronic FOIA request.

The FOIA Coordinator may, in his or her discretion, implement administrative rules, consistent with State law and these Procedures and Guidelines to administer the acceptance and processing of FOIA requests.

The City is not obligated to create a new public record, or to make a compilation or summary of information which does not already exist, in response to a FOIA request. Neither the FOIA Coordinator nor other City staff are obligated to provide answers to questions contained in requests for public records or questions regarding the content of the records themselves.

The FOIA Coordinator shall keep a copy of all written requests for public records received by the City on file for a period of at least one year.

The City will make this Procedures and Guidelines document and the accompanying Written Public Summary publicly available without charge. The City acknowledges that it cannot require deposits or charge fees otherwise permitted under the FOIA until it is in compliance with the FOIA.

A copy of this Procedures and Guidelines document and the City's written public summary must be publicly available by providing free copies both in the City's response to written FOIA requests and upon request by visitors at City Hall. This Procedures and Guidelines document and the City's Written Public Summary will be maintained on the City's website at a readily identifiable location, and a link to those documents may be provided in lieu of providing paper copies of those documents when responding to FOIA requests or to questions posed in person by visitors to City Hall.

## **Section 2: Requests for Public Records**

The public is not required to use a specific form in order to make a request for public documents under FOIA. However, the FOIA Coordinator will make available a FOIA Request Form for use by the public.

Requests to inspect or obtain copies of public records prepared, owned, used, possessed or retained by the City may be submitted on the City's FOIA Request Form, in any other form of writing (letter, fax, email, etc.), or by verbal request.

Verbal requests for records must be documented by the City on the City's FOIA Request Form.

If a person makes a verbal, non-written request for information, and if the City employee receiving the request believes or knows that the information is available on the City's website (where practicable and to the best ability of the employee receiving the request), the requestor shall be informed by the employee of the pertinent website address where the information can be obtained.

Any request submitted to the City under FOIA, whether or not it uses a FOIA Request Form provided by the City, must sufficiently describe a public record so as to enable City personnel to identify and find the requested public record.

Written requests for public records may be submitted in person at City Hall, by mail, or electronically by fax, email, or other electronic written form. Upon their receipt, requests for public records shall be promptly forwarded by the receiving personnel to the FOIA Coordinator for processing.

Written requests may be delivered to City Hall in person or by mail to the following address:

City of Frankfort  
Attn: FOIA Coordinator  
412 Main St.  
P.O. Box 351  
Frankfort, MI 49635

Requests may be faxed to: (231) 352-7100, or emailed to: [kkidder@cofrankfort.net](mailto:kkidder@cofrankfort.net).

A person may request that public records be provided on non-paper physical media, emailed, or otherwise provided to him or her in digital form in lieu of receiving paper copies. The City will comply with such requests only if it possesses the necessary technological capability to provide records in the requested non-paper physical media format.

A person may subscribe to future issues of public records that are created, issued or disseminated by the City on a regular basis. A subscription is valid for up to 6 months and may be renewed by the subscriber.

A person serving a sentence of imprisonment in a local, state, or federal correctional facility is not entitled to submit a request for a public record. The FOIA Coordinator will deny all such requests.

### **Section 3: Processing a Request**

Unless otherwise agreed to in writing by the person making the request, and except as otherwise specifically provided elsewhere in these Procedures and Guidelines, the City will issue a response to any FOIA request within 5 business days of receiving the request.

Depending on the circumstances, the City will respond to each FOIA request by:

- Granting the request;
- Issuing a written notice denying the request;
- Granting in part and issuing a written notice denying in part the request;

- Issuing a notice indicating that, due to the nature of the request, the City needs an additional 10 business days to respond for a total of no more than 15 business days (only one such extension per FOIA request is permitted); or
- Issuing a written notice indicating that the public record requested is available at no charge on the City's website.

***When a request is granted:***

If a request is granted, or granted in part, the FOIA Coordinator will require that payment be made in full for the allowable fees associated with responding to the request before the public record is made available. The FOIA Coordinator shall provide a detailed itemization of the allowable costs incurred to process the request to the person making the request.

A copy of these Procedures and Guidelines and the City's Written Public Summary may be provided to the requestor free of charge with the response to a written request for public records, provided that because these Procedures and Guidelines and the Written Public Summary are maintained on the City's website, a link to the Procedures and Guidelines and the Written Public Summary may be provided in lieu of providing paper copies of those documents.

If the cost of processing a FOIA request is \$50 or less, the requestor will be notified of the amount due and where the documents can be obtained. If the cost of processing a FOIA request is expected to exceed \$50 based on a good-faith calculation, or if the requestor has not paid in full for a FOIA request previously granted by the City, the City will require the requestor to make a good-faith deposit as outlined in Section 4 of these Procedures and Guidelines. In making the request for a good-faith deposit the FOIA Coordinator shall provide the requestor with a detailed itemization of the allowable costs estimated to be incurred by the City to process the request and also provide a best efforts estimate of a time frame it will take the City to provide the records to the requestor. The best efforts estimate shall be nonbinding on the City, but will be made in good faith and will strive to be reasonably accurate, given the nature of the request in the particular instance, so as to provide the requested records in a manner based on the public policy expressed by Section 1 of the FOIA.

***When a request is denied or denied in part:***

If the request is denied or denied in part, the FOIA Coordinator will issue a Notice of Denial which shall provide, as applicable:

- An explanation as to why a requested public record is exempt from disclosure;
- A certificate that the requested record does not exist under the name or description provided by the requestor, or another name reasonably known by the City;
- An explanation or description of the public record or information within a public record that is separated or deleted from the public record;
- An explanation of the person's right to submit an appeal of the denial to the City Council or to seek judicial review in the Benzie County Circuit Court; or
- An explanation of the right to receive attorneys' fees, costs, and disbursements as well actual or compensatory damages, and punitive damages of \$1,000, should the requestor prevail in Circuit Court.

The Notice of Denial shall be signed by the FOIA Coordinator.

If a request does not sufficiently describe a public record, the FOIA Coordinator may, in lieu of issuing a Notice of Denial indicating that the request is deficient, seek clarification or amendment of the request from the person making the request. Any clarification or amendment to a FOIA request will be considered a new request for purposes of the time allowed for a response by these Procedures and Guidelines.

***Requests to inspect public records:***

Upon receiving a verbal request to inspect City records, the City shall furnish the requesting person with a reasonable opportunity and reasonable facilities for inspection and examination of its public records. A person shall be allowed to inspect public records during usual business hours, not less than four hours per day. The public does not have unlimited access to City offices or facilities, and a person may be required to inspect records at a specified counter or table, and in view of City personnel.

City officials, appointees, staff or consultants/contractors assisting with inspection of public records shall inform any person inspecting records that only pencils, and no pens or ink, may be used to take notes. The FOIA Coordinator is authorized to promulgate rules regulating the manner in which records may be viewed so as to protect City records from loss, alteration, mutilation or destruction and to prevent excessive interference with normal City operations.

In coordination with the official responsible for the records, the FOIA Coordinator shall determine on a case-by-case basis when the City will provide copies of original records, to allow for blacking out exempt information, to protect old or delicate original records, or because the original record is a digital file or database not available for public inspection. In these circumstances or in other special circumstances identified by the FOIA Coordinator and explained to the requestor, copies may be required in order to enable public inspection of records. In such cases, fees and costs associated with such copies, so long as they are consistent with these Procedures and Guidelines, will be charged.

The FOIA Coordinator is responsible for identifying if records or information requested by the public is stored in digital files or e-mail, even if the public does not specifically request a digital file or e-mail. A person cannot remove books, records or files from the place the City has provided for the inspection.

No documents shall be removed from the office of the custodian of those documents without permission of that custodian, except by court order, subpoena or for audit purposes. The official shall be given a receipt listing the records being removed. Documents may be removed from the office of the custodian of those documents with permission of that custodian to accommodate public inspection of those documents.

***Requests for certified copies:***

The FOIA Coordinator shall, upon written request, furnish a certified copy of a public record at no additional cost to the person requesting the public record.

#### **Section 4: Fee Deposits**

If the fee estimate is expected to exceed \$50.00 based on a good-faith calculation, the requestor will be asked to provide a deposit not exceeding one-half of the total estimated fee.

If a request for public records is from a person who has not paid the City in full for copies of public records made in fulfillment of a previously granted written request, the FOIA Coordinator will require a deposit of 100% of the estimated processing fee before beginning to search for a public record for any subsequent written request by that person when all of the following conditions exist:

- The final fee for the prior written request was not more than 105% of the estimated fee;
- The public records made available contained the information sought in the prior written request and remain in the City's possession;
- The public records were made available to the individual, subject to payment, within the time frame estimated by the City to provide the records;
- Ninety (90) days have passed since the FOIA Coordinator notified the individual in writing that the public records were available for pickup or mailing;
- The individual is unable to show proof of prior payment to the City; and
- The FOIA Coordinator has calculated a detailed itemization that is the basis for the current written request's increased estimated fee deposit.

The FOIA Coordinator will not require an increased estimated fee deposit if any of the following apply:

- The person making the request is able to show proof of prior payment in full to the City;
- The City is subsequently paid in full for the applicable prior written request; or
- Three hundred sixty five (365) days have passed since the person made the request for which full payment was not remitted to the City.

#### **Section 5: Calculation of Fees**

A fee may be charged for the labor cost of copying and duplication necessary to response to a FOIA request.

A fee will **not** be charged for the labor cost of search, examination, review and the deletion and separation of exempt from nonexempt information **unless** failure to charge a fee would result in unreasonably high costs to the City because of the nature of the request in the particular instance, and the City specifically identifies the nature of the unreasonably high costs.

Costs for the search, examination, review, and deletion and separation of exempt from non-exempt information are "unreasonably high" when they are excessive and beyond the normal or usual amount for those services<sup>1</sup> compared to the costs of the City's usual FOIA requests, not compared to the City's operating budget.<sup>2</sup>

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<sup>1</sup> Attorney General Opinion 7083 of 2001.

<sup>2</sup> *Bloch v. Davison Community Schools*, Michigan Court of Appeals, Unpublished, April 26, 2011.

The following factors shall be used to determine an unreasonably high cost to the City:

- Volume of the public record requested;
- Amount of time spent to search for, examine, review and separate exempt from non-exempt information in the record requested;
- Whether the public records are from more than one City department or whether various City offices are necessary to respond to the request;
- The available staffing to respond to the request; and
- Any other similar factors identified by the FOIA Coordinator in responding to the particular request.

The FOIA permits the City to charge for the following costs associated with processing a request:

- Labor costs associated with copying or duplication, which includes making paper copies, making digital copies, or transferring digital public records to non-paper physical media or through the Internet.
- Labor costs associated with searching for, locating and examining a requested public record, when failure to charge a fee will result in unreasonably high costs to the City.
- Labor costs associated with a review of a record to separate and delete information exempt from disclosure, when failure to charge a fee will result in unreasonably high costs to the City. If the City does not employ a person capable of separating and deleting exempt information from nonexempt information in a particular instance, as determined by the FOIA Coordinator on a case-by-case basis, the City may charge for contracted labor costs necessary for performance of this function.
- The cost of copying or duplication, not including labor, of paper copies of public records. This may include the cost for copies of records already on the City's website if you ask for the City to make copies.
- The cost of computer discs, computer tapes, or other digital or similar media when the requestor asks for records in non-paper physical media.
- The cost to mail or send a public record to a requestor.

All labor costs will be calculated based on the following requirements:

- Labor costs will be estimated and charged in 15-minute increments, with all partial time increments rounded down. If the total time involved is less than 15 minutes, there will be no charge.
- Labor costs will be charged at the hourly wage of the lowest-paid City employee capable of doing the work in the specific fee category, regardless of who actually performs work.
- The City may add up to 50% to the applicable labor charge amount to cover or partially cover the cost of fringe benefits, but in no case will this additional charge exceed the actual cost of fringe benefits.
- Overtime wages will not be included in labor costs unless agreed to by the requestor, and overtime costs will not be used to calculate the fringe benefit cost.
- Contracted labor costs for the separation and deletion of exempt information from nonexempt information, where applicable, will be charged at the hourly rate of 6 times the state minimum hourly wage. At the time these FOIA Procedures and Guidelines were

adopted, the resulting hourly rate for contracted labor costs was \$48.90 per hour. However, that rate is subject to change with fluctuations in the minimum wage.

The cost to provide records on non-paper physical media, when so requested, will be based on the following requirements:

- Computer disks, computer tapes, or other digital or similar media will be at the actual and most reasonably economical cost for the non-paper media.
- This cost will only be assessed if the City has the technological capability necessary to provide the public record in the requested non-paper physical media format.
- The City will procure any non-paper media and will not accept media from the requestor in order to ensure integrity of the City's technology infrastructure.

The cost to provide paper copies of records will be based on the following requirements:

- Paper copies of public records made on standard letter (8 ½ x 11) or legal (8 ½ x 14) sized paper will not exceed \$0.10 per sheet of paper. Copies for non-standard sized sheets of paper will reflect the actual cost of reproduction.
- The City will provide records using black-and-white ink, and using double-sided printing, if such methods are cost-saving and available.

The cost to mail records to a requestor will be based on the following requirements:

- The actual cost to mail public records using a reasonably economical and justified means.
- The City may charge for the least expensive form of postal delivery confirmation.
- No cost will be made for expedited shipping or insurance unless specified by the requestor.

If the FOIA Coordinator does not respond to a written request in a timely manner, the City will reduce the labor costs by 5% for each day the City exceeds the time permitted under FOIA, up to a maximum reduction of 50%, **if** any of the following apply:

- The City's late response was willful and intentional;
- The written request conveyed a request for information within the first 250 words of the body of a letter facsimile, email or email attachment; or
- The written request included the words, characters, or abbreviations for "freedom of information," "information," "FOIA," "copy" or a recognizable misspelling of such, or legal code reference to MCL 15. 231, *et seq.* or 1976 Public Act 442 on the front of an envelope or in the subject line of an email, letter, or facsimile cover page.

The City will fully note any reduced charge in the detailed itemization of costs provided to the requestor.

## **Section 6: Waiver of Fees**

The cost of the search for and copying of a public record may be waived or reduced if in the sole judgment of the FOIA Coordinator a waiver or reduced fee is in the public interest because it can be considered as primarily benefitting the general public. The City Council may identify specific records or types of records it deems should be made available for no charge or at a reduced cost.

## **Section 7: Discounted Fees**

The FOIA Coordinator will discount the first \$20.00 of the processing fee for a request received from the following:

- A person who, with his or her request for public records, submits an affidavit stating that they are either indigent and receiving specific public assistance, or, if they are not receiving public assistance, an affidavit stating facts demonstrating an inability to pay because of indigence. An individual is not eligible to receive this discount if the requestor has previously received discounted copies of public records from the City twice during the calendar year, or if the requestor requests information in connection with other persons who are offering or providing payment to make the request. An affidavit is sworn statement. The FOIA Coordinator will make an Indigence Affidavit Form available for use by the public.
- A nonprofit organization formally designated by the state to carry out activities under subtitle C of the federal developmental disabilities assistance and bill of rights act of 2000, Public Law 106-402, and the protection and advocacy for individuals with mental illness act, Public Law 99-319, or their successors, if the request meets all of the following requirements:
  - It is made directly on behalf of the organization or its clients;
  - It is made for a reason wholly consistent with the mission and provisions of those laws under section 931 of the mental health code, 1974 PA 258, MCL 330.1931;
  - It is accompanied by documentation of its designation by the state, if requested by the public body.

## **Section 8: Appeal of a Denial or Partial Denial of Request for Public Records**

When a requestor believes that all or a portion of a public record has not been disclosed or has been improperly exempted from disclosure, he or she may file an appeal with the FOIA Coordinator. The appeal must be in writing and must specifically state the word "appeal" and identify the reason or reasons the requestor is seeking a reversal of the denial. The FOIA Coordinator will offer a standard FOIA Appeal Form for this purpose.

The FOIA Coordinator will promptly provide the written appeal to the City Council for consideration at its next regularly-scheduled meeting. An appeal is considered received by the City Council on the date of the next regularly scheduled meeting following receipt of the appeal by the FOIA Coordinator. The time of receipt by the FOIA Coordinator of any appeal submitted by electronic means such as email

shall be in accordance with the provisions in Section 1 of these Procedures and Guidelines regarding the receipt of electronic FOIA requests.

Within 10 business days of the City Council's receipt of the FOIA appeal, the City Council, through the FOIA Coordinator, will respond in writing by:

- Reversing the disclosure denial;
- Upholding the disclosure denial;
- Reversing the disclosure denial in part and upholding the disclosure denial in part; or
- Under unusual circumstances, issuing a notice extending for not more than 10 business days the period during which the City Council will respond to the written appeal. The City Council shall not issue more than one notice of extension for a particular written appeal of a FOIA request denial.

If the City Council fails to respond to a written appeal in one of the ways identified above, or if the City Council upholds all or a portion of the disclosure denial that is the subject of the written appeal, the requestor may seek judicial review of the nondisclosure by commencing a civil action in Circuit Court.

Whether or not a requestor submitted an appeal of a denial to the City Council, he or she may file a civil action in the Benzie County Circuit Court within 180 days after the City's final determination to deny the request.

If a court determines that a public record is not exempt from disclosure, it shall order the City to cease withholding or to produce all or a portion of a public record wrongfully withheld, regardless of the location of the public record. Failure to comply with an order of the court may be punished as contempt of court.

If a person asserting the right to inspect, copy, or receive a copy of all or a portion of a public record prevails in such an action, the court shall award reasonable attorneys' fees, costs, and disbursements. If the person or City prevails in part, the court may, in its discretion, award all or an appropriate portion of reasonable attorneys' fees, costs, and disbursements.

If the court determines that the City has arbitrarily and capriciously violated this act by refusal or delay in disclosing or providing copies of a public record, the court shall order the City to pay a civil fine of \$1,000.00, which shall be deposited into the general fund of the state treasury. The court shall award, in addition to any actual or compensatory damages, punitive damages in the amount of \$1,000.00 to the person seeking the right to inspect or receive a copy of a public record. The damages shall not be assessed against an individual, but shall be assessed against the next succeeding public body that is not an individual and that kept or maintained the public record as part of its public function.

### **Section 9: Appeal of FOIA Processing Fee**

If a requestor believes that the fee charged by the City to process a FOIA request exceeds the amount permitted by state law or these Procedures and Guidelines, he or she must first appeal to the City

Council by submitting a written appeal for a fee reduction to FOIA Coordinator.<sup>3</sup> The appeal must be in writing and must specifically state the word "appeal" and identify how the required fee exceeds the amount permitted. The FOIA Coordinator will offer a standard FOIA Appeal Form for this purpose.

The FOIA Coordinator will promptly provide the written appeal to the City Council for consideration at its next regularly-scheduled meeting. An appeal is considered received by the City Council on the date of the next regularly scheduled meeting following receipt of the appeal by the FOIA Coordinator. The time of receipt by the FOIA Coordinator of any appeal submitted by electronic means such as email shall be in accordance with the provisions in Section 1 of these Procedures and Guidelines regarding the receipt of electronic FOIA requests.

Within 10 business days after receiving the appeal, the City Council will respond in writing by:

- Waiving the fee;
- Reducing the fee and issuing a written determination indicating the specific basis that supports the remaining fee;
- Upholding the fee and issuing a written determination indicating the specific basis that supports the required fee; or
- Issuing a notice detailing the reason or reasons for extending for not more than 10 business days the period during which the City Council will respond to the written appeal. The City Council shall not issue more than 1 notice of extension for a particular written fee appeal.

Where the City Council reduces or upholds a fee, its determination must include a certification from the City Council that the statements in the determination are accurate and that the reduced fee amount complies with its publicly available Procedures and Guidelines and with Section 4 of the FOIA.

Within 45 days after receiving notice of the City Council's determination of a fee appeal, the requesting person may commence a civil action in the Benzie County Circuit Court for a fee reduction.

If a civil action is commenced against the City for an excess fee, the City is not obligated to complete the processing of the written request for the public record at issue until the court resolves the fee dispute.

An action shall not be filed in Circuit Court unless *one* of the following applies:

- The City does not provide for appeals of fees;
- The City Council failed to respond to a written appeal as required; or
- The City Council issued a determination of a written appeal.

If a court determines that the City required a fee that exceeds the amount permitted under its publicly available Procedures and Guidelines or Section 4 of the FOIA, the court shall reduce the fee to a permissible amount. Failure to comply with an order of the court may be punished as contempt of court.

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<sup>3</sup> As used in this section, "fee" means the total fee or any component of the total fee calculated under section 4 of the FOIA, including any deposit.

If the requesting person prevails in court by receiving a reduction of 50% or more of the total fee, the court may, in its discretion, award all or an appropriate portion of reasonable attorneys' fees, costs, and disbursements. The award shall be assessed against the public body liable for damages.

If the court determines that the City has arbitrarily and capriciously violated the FOIA by charging an excessive fee, the court shall order the City to pay a civil fine of \$500.00, which shall be deposited in the general fund of the state treasury. The court may also award, in addition to any actual or compensatory damages, punitive damages in the amount of \$500.00 to the person seeking the fee reduction. The fine and any damages shall not be assessed against an individual, but shall be assessed against the next succeeding public body that is not an individual and that kept or maintained the public record as part of its public function.

### **Section 10: Conflict with Prior FOIA Policies and Procedures; Effective Date**

To the extent that these Procedures and Guidelines conflict with previous FOIA policies promulgated by the City, these Procedures and Guidelines are controlling. To the extent that any administrative rule promulgated by the FOIA Coordinator subsequent to the adoption of this resolution is found to be in conflict with any previous policy promulgated by the City, the administrative rule promulgated by the FOIA Coordinator is controlling.

To the extent that any provision of these Procedures and Guidelines or any administrative rule promulgated by the FOIA Coordinator pertaining to the release of public records is found to be in conflict with any state statute, the applicable statute shall control. The FOIA Coordinator is authorized to modify this policy and all previous policies adopted by the City Council, and to adopt such administrative rules as he or she may deem necessary, to facilitate the legal review and processing of requests for public records made pursuant to the FOIA, provided that such modifications and rules are consistent with state law. The FOIA Coordinator shall promptly inform the City Council of any change these Procedures and Guidelines.

These FOIA Procedures and Guidelines become effective July 1, 2015.

### **Section 11: Appendix of City FOIA Forms**

- Written Public Summary of FOIA Procedures and Guidelines
- FOIA Request Form
- Notice to Extend Response Time Form
- Notice of Denial Form
- Itemized Cost Worksheet
- Indigence Affidavit Form
- FOIA Appeal Form