



March 31, 2026

The Honorable Evan P. Shanley, Chair  
House State Government and Elections  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

**RE: HOUSE BILL 7305 – AN ACT RELATING TO PUBLIC RECORDS -- ACCESS TO PUBLIC RECORDS**

Chair Shanley and Honorable Committee Members,

On behalf of the Rhode Island League of Cities and Towns and our 39 member municipalities, we appreciate the opportunity to offer comments on House Bill 7305, which proposes amendments to the Access to Public Records Act (APRA).

We recognize and value the bill’s goal of promoting transparency and reinforcing public trust in government. However, in its current form, the League must respectfully oppose the legislation. We offer the following concerns and suggested revisions to help achieve a more appropriate balance between public access, privacy protections, and the practical realities municipalities face in carrying out their responsibilities.

**1. Presumption of Disclosure for Police Reports**

**Municipal Concern:**

Police departments frequently handle sensitive matters that do not result in arrests, such as mental health calls, domestic incidents, or juvenile interactions. Eliminating this exemption risks exposing private information and could discourage community members from seeking assistance.

**2. Disclosure of Final Internal Affairs Reports**

**Municipal Concern:**

Releasing reports involving minor, administrative, or unfounded complaints could harm reputations and hinder internal reporting. Limiting disclosure to serious misconduct better aligns with public interest and due process.

**Suggested Amendment:**

After “shall be public records,” insert: “only where excessive force is alleged or in the case of dishonesty and integrity.”

### 3. Timeline for Body-Worn Camera Footage Disclosure

**Municipal Concern:**

Investigative integrity must be preserved. Allowing time for completion ensures that facts are properly assessed and individuals' rights are protected.

**Suggested Amendment:**

Delete the language: "within thirty (30) days of a request in full or redacted form..." and replace with: "upon substantial completion of the investigation."

### 4. Clarification of Public Official Communications

**Municipal Concern:**

Removing this language entirely could risk the release of personal messages or informal exchanges that were not part of a public official's responsibilities, thereby creating privacy and administrative concerns.

**Suggested Amendment:**

Delete: "that has no demonstrable connection to the exercise of official acts or duties."  
Retain the exemption for communications in an official capacity unrelated to official duties.

### 5. Definition of "Good Cause"

**Municipal Concern:**

Clear criteria for "good cause" are essential to avoid inconsistent interpretations and ensure fair, predictable decision-making.

**Suggested Amendment:**

Define "good cause" to include:

**Public Health and Safety Concerns** – If the violation poses a risk to public health or safety, such as environmental hazards, unsafe building conditions, or food safety violations.

**Consumer Protection** – If the investigation involves fraudulent or deceptive practices impacting the public.

**Government Transparency and Accountability** – If release is needed to maintain public trust.

**Legal Proceedings and Due Process** – If records are necessary for civil or administrative matters of public interest.

**Public Interest or Media Investigations** – If disclosure would expose systemic issues or patterns of noncompliance.

**Compliance with Federal or State Oversight** – If required by a higher authority for enforcement or compliance.

## 6. Timeframe for Arrest Record Reporting

### Municipal Concern:

Reducing the window improves real-time reporting and access, aligning more closely with public expectations without burdening municipal records systems.

### Suggested Amendment:

Replace “thirty (30) days” with “seven (7) days.”

## 7. Copy Fee Adjustment

### Municipal Concern:

The current fee does not cover the true cost of copying and administration. A ten-cent rate remains affordable while helping municipalities recover costs.

### Suggested Amendment:

Replace “five cents (\$.05)” with “ten cents (\$.10).”

## 8. Hourly Rate for Search, Retrieval, and Redaction

### Municipal Concern:

The \$15/hour cap does not reflect current municipal labor costs. Raising the cap to \$20/hour helps support sustainable records access without deterring request fulfillment.

### Suggested Amendment:

Replace “fifteen dollars (\$15.00)” with “twenty dollars (\$20.00).”

## 9. Deletion of Vague “Good Cause” Language

### Municipal Concern:

Without a specific standard or procedure, this phrase introduces ambiguity. As noted, we recommend applying the defined “good cause” standard uniformly or removing such clauses where they create legal uncertainty.

### Suggested Amendment:

Delete: “(1) Upon good cause shown;”

The League supports the goals of transparency and maintaining public trust in government. We also acknowledge the practical and legal complexities involved in implementing access requirements in a manner that is both fair and workable. We offer these recommendations as the Committee continues its deliberations on House Bill 7305.

We look forward to continued collaboration with the General Assembly and other stakeholders to ensure that APRA advances the public interest while also recognizing operational realities, due process considerations, and the capacity of municipalities.

Thank you for your time and consideration of our perspective.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Rossi".

Randy R. Rossi  
Executive Director

Cc: Honorable Members of House State Government and Elections Committee