FREEDOM OF INFORMATION LAW (FOIL) POLICY AND PROCEDURES

Reviewed and Adopted September 29, 2026

1. Policy and legal authority

Urban Dove Team Charter Schools (the "School" or "Corporation," as applicable to the legal education corporation adopting this policy) provides public access to records in accordance with New York Public Officers Law ("POL") Article 6 (§§ 84–90), Education Law § 2854(1)(e), and 21 NYCRR Part 1401. The School shall interpret this policy consistently with applicable law. This policy does not govern access to a student's own education records under FERPA or other independent access rights.

2. Records and coverage

A record includes information kept, held, filed, produced, or reproduced by, with, or for the School in any physical or electronic form, including emails and records held by contractors or Urban Dove personnel for the School. Requests need only reasonably describe identifiable records. The School need not create a new record, but shall retrieve or extract electronic data when required by POL § 89(3)(a), including when it can do so with reasonable effort. Exempt portions shall be redacted when reasonably possible and nonexempt portions released.

3. Records Access Officer and public access

The Board designates the following Records Access Officer ("RAO") to coordinate responses and ensure diligent searches, appropriate redactions, disclosure, and required certifications. Staff receiving requests shall promptly forward them to the RAO.

RAO name/title: Walter Martin, Director of Operations
Business address: 21-21 41st Avenue, Ste 2D, Long Island City, NY 11101
Telephone: 212-244-2131
Email: info@urbandove.org

Records may be inspected and copied during regular business hours at 21-21 41st Avenue, Ste 2D, Long Island City, NY 11101 between 10 AM and 4 PM, or by appointment where reasonably necessary. The School shall post conspicuous public notice identifying where and when records are available, the RAO, and the appeals contact. The School will accept requests delivered personally, by mail, and by email at the published addresses; no particular form is mandatory.

4. Requests and statutory response deadlines

Within five business days after receipt of a reasonably described written request, the School shall (a) make records available, (b) deny access in writing with reasons and appeal instructions, or (c) acknowledge receipt in writing with an approximate date for granting or denying the request. If a response will take more than 20 business days after acknowledgment, the School shall provide a written explanation and a reasonable date certain for granting or denying access. If unable to meet a date given, the School shall explain in writing the reason and provide a further reasonable date as required by POL § 89(3)(a). Unreasonable delays or failures to comply may constitute constructive denials appealable under FOIL.

When a record is available electronically, the School shall provide it in the requested electronic format to the extent required by law and reasonably possible. If records are posted online, the School may direct the requester to the specific location, subject to the requester's statutory right to obtain copies. The School shall certify a copy as true upon request, or certify that it does not possess a requested record or cannot locate it after a diligent search, as applicable.

5. Grounds for withholding and redaction

Disclosure is the presumption. The School may withhold only records or portions that fall within POL § 87(2) or another controlling law, including: records specifically exempt by statute; unwarranted invasions of personal privacy; information whose disclosure would impair present or imminent contract awards or collective bargaining; qualifying trade secrets or commercial information causing substantial competitive injury; qualifying law-enforcement records; records whose disclosure would endanger life or safety; qualifying inter- or intra-agency deliberative material (but not required-to-be-disclosed factual data, instructions affecting the public, final policy or determinations, or external audits); examination questions or answers requested before final administration; and protected computer access codes or other information exempt under current law.

Student personally identifiable education information shall be evaluated under FERPA, Education Law § 2-d and applicable confidentiality requirements. Personnel, payroll, financial, vendor, and governance records are not categorically exempt; the RAO must apply the relevant law to each record and release reasonably segregable portions. Attorney-client privileged material and other legally protected information shall be evaluated under applicable statutory exemptions.

6. Fees

No fee shall be charged for inspection, searching for records, reviewing records to determine disclosure, or certifications required under FOIL. Unless a different statutory fee applies, paper photocopies up to 9 × 14 inches may be charged at no more than $0.25 per page; other reproduction fees may not exceed actual cost as defined in POL § 87(1)(b)–(c). Electronic-data preparation labor may be charged only where statutory conditions are satisfied (including more than two hours of employee time); the charge is based on the lowest-paid qualified employee. The School shall provide a fee estimate where appropriate and may waive lawful fees. If an identical electronic record was prepared for a request in the preceding six months and remains available, no reproduction fee shall be charged except actual media cost, as provided by law.

7. Denials and administrative appeals

A written denial shall identify the reason and advise the requester of the right to appeal within 30 days, identifying the Appeals Officer by name, title, business address, and telephone number. A failure to respond as required may be appealed as a constructive denial. The Appeals Officer shall be a person or body other than the RAO whose determination is under review.

Appeals Officer name/title: Michael Lukauskas, Associate Director, Data and Programming
Business address: 21-21 41st Avenue, Ste 2D, Long Island City, NY 11101
Telephone: 212-244-2131
Email: info@urbandove.org

Within ten business days of receipt of an appeal, the Appeals Officer shall grant access or fully explain in writing the reasons for further denial. The School shall transmit a copy of each appeal upon receipt and its determination to the New York State Committee on Open Government, Department of State, One Commerce Plaza, 99 Washington Avenue, Albany, NY 12231, as required by POL § 89(4)(a). A final denial is subject to judicial review under CPLR Article 78.

8. Subject matter list and payroll information

The RAO shall maintain a reasonably detailed subject matter list of categories of records held by the School, including categories containing exempt records, and update it at least annually with the date of the latest update on the first page. The School shall also maintain and make available the record of names, public office addresses, titles, and salaries of

officers and employees as required by POL § 87(3)(b), subject to any applicable legal limitations. Appendix A is the School's subject matter list and shall be reviewed annually.

9. Records preservation, management and implementation

The School shall comply with applicable retention schedules and preserve responsive records while a request, appeal, or litigation hold is pending. The RAO shall coordinate with School employees, trustees, and any management or service providers holding School records. The School remains responsible for its own FOIL compliance; the fact that Urban Dove, Inc. maintains a record on the School's behalf does not itself exempt the record. This policy does not purport to make every independent record of Urban Dove, Inc. subject to FOIL.

***See Subject Matter List Below**

APPENDIX A
SUBJECT MATTER LIST

Reviewed and approved on September 29, 2026

For more information please visit the website of the Committee on Open Government at https://opengovernment.ny.gov/.

This list describes record categories, not a determination that every record is disclosable.

Board of Trustees Records

Agendas; minutes of board and committee meetings; bylaws; policies

Charter Records

Provisional charters; charter agreements

Administrative Records

Grants and contracts; fixed asset inventory; leases and property documents; fundraising records

Human Resources Records

Employee payroll records and reports; personnel records; timesheets and attendance; assignments and garnishments; benefit plan documents; workers' compensation documents; employment applications; fingerprint clearance records; certification records

Financial Records

Accounts payable and receivable ledgers and schedules; independent audit reports; financial statements; depreciation schedules; bank statements and reconciliations; cancelled checks; cash receipts and disbursements; expense analyses and distribution schedules; fixed asset records and appraisals; general ledgers; W-2, W-4, and 1099 forms; banking agreements; vendor invoices; tax returns and correspondence

Insurance Records

Insurance policies; accident reports and claims

Student Records

Student cumulative education records; examination results; application, lottery, and enrollment documents; attendance records; disciplinary records; health records