

Klemm, Sara

From: Laura Anderson Wright <landerso@umd.edu>
Sent: Monday, July 20, 2026 7:15 PM
To: PIA Opengov
Subject: Recommendations to the PIACB; due 8/14/26

Categories: Purple category

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- 1.
- 2.
3. Add a new subsection
- 4.

Section 4-101(k)(3)(iii) Records within archival or library collections.

- 2.
- 3.
4. Add a new subsection
- 5.

Section 4-101(k)(3)(iv) Data, records, or information of a proprietary nature, produced or collected by faculty and or staff of public institutions of higher education in the conduct of, or as a result of study or research on medical, scientific, technical or scholarly issues where such data, records or information has not been publicly released, published, copyrighted or patented.

- 3.
- 4.
5. Add a new subsection
- 6.

Section 4-346(c) A custodian may deny inspection of data, records, or information of a proprietary nature, produced or collected by faculty and or staff of public institutions of higher education in the conduct of, or as a result of, study or research on medical, scientific, technical or scholarly issues where such data, records or information has not been publicly released, published, copyrighted or patented.

- 4.
- 5.

6. Section 4-203

7.

When a 30 calendar day extension is requested to go beyond the standard 30 calendar day time limit, the extension is automatically granted. Extensions beyond 60 calendar days may be granted with consent of the applicant.

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7. Section 4-206: Complaints for unreasonable fees are triggered at \$1,000 instead of \$350

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11. Employee directories: Treat like 4-355 (can deny if for a commercial or solicitation purpose).

Why this change? Agencies

12. are hit with an exponential increase in fraud; spam; phishing scams.

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16. Purchasing Order (mass) information: can deny if for a commercial or solicitation purpose.

Why? Fraud. The information

17. can be used to generate invoices that look legitimate and presented for payment.

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21. Like PA, ban anonymous requests and those filed by third party firms to shield the identity of the true requester. See

22. Manual p 2-1.

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26. For requests for emails, limit to 1 year in duration

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30. "Calendar" should be switched to "business" days throughout the Act.

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34. By definition, a request for commercial purposes

35. cannot eligible for a fee waiver.

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39. Exclude internal data and

40. figures concerning intercollegiate athletics' NIL figures. Their release undermines our competitive position.

41.

42.

--

Laura Anderson Wright, Esq.

Sr. Associate General Counsel

Student Affairs Practice Lead

& Public Records Officer

University of Maryland

Office of General Counsel

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Pronouns: she/her/hers

Clifton Strengths: Discipline, Harmony, Achiever, Developer, Focus

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Klemm, Sara

From: Laura Anderson Wright <landerso@umd.edu>
Sent: Wednesday, July 29, 2026 12:41 PM
To: PIA Opengov
Subject: Recommendation to PIACB/OMBUDS

Follow Up Flag: Follow up
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Categories: Blue category

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Need an amendment indicating that VIN numbers cannot be released via the MPIA.

Why?

A request for VIN numbers could be for a nefarious or fraudulent purpose, even though VINs themselves are not classified as private personal data. Here are the main risks documented in reliable sources:

Fraudulent or Criminal Reasons Someone Might Want VINs

1. VIN cloning (vehicle identity theft)

Fraudsters can take a legitimate VIN from a similar vehicle and use it to “wash” the identity of a stolen car. This creates a fake identity that can bypass law enforcement databases and be sold as a clean, legitimate vehicle. Exposing VINs publicly increases this risk.

2. Targeting vehicles for theft

Making VINs easy to obtain can help criminals identify high-value vehicles and create fraudulent paperwork, making theft easier and less detectable. The DPPA exists partly to prevent this type of misuse.

3. Reverse-engineering access to restricted data

Although a VIN is visible on the vehicle, systematically using VINs to extract ownership information or personal details without permissible purpose violates federal privacy laws. Criminals may attempt to obtain VINs through public records requests and then try to access linked databases for identity theft or other fraudulent activity.

4. Fraudulent resale or title washing

VINs allow access to salvage, theft, accident, and lien records. A bad actor might use VIN data to create forged documents or manipulate titles to disguise a vehicle’s true history before a fraudulent resale.

Video Explanations of the Fraud

<https://www.youtube.com/watch?v=mXA49TMcEak>

https://www.google.com/search?q=VIN+number+fraud&rlz=1C1GCEA_enUS1214US1214&oq=VIN+number+fraud&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIHCAEQIRiPAIiBCDM1NTRqMGo3qAIAsAIA&sourceid=chrome&source=chrome.ob&ie=UTF-8#fpstate=ive&vld=cid:99dfa794,vid:upiUb9j6XLM,st:0

The risks seem greater than shining the light on any government business/operations

--

Laura Anderson Wright, Esq.

Sr. Associate General Counsel

Student Affairs Practice Lead

& Public Records Officer

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Klemm, Sara

From: Bryan Lau <[REDACTED]>
Sent: Friday, August 7, 2026 1:40 PM
To: PIA Opengov
Cc: mary.lehman@house.state.md.us; Council District 1 (councildistrict1@co.pg.md.us); Michelle Garcia; Andrea L. Crooms; Bryan Lau
Subject: Comments for Annual Meeting - Review

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Purple category, Blue category

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piaopengov@oag.maryland.gov

PIA Compliance Board
c/o Office of the Attorney General
200 St. Paul Place, 19th Floor
Baltimore, MD 21202

I request reconsideration or clarification of the provisions relating to the preparation of Minutes and Live and Archived Video or Audio

The Act States Chapter 6: Meeting Documents.

Chapter summary: The Act generally requires that public bodies prepare minutes “as soon as practicable” after they meet unless “live and archived video or audio streaming of the open session is available” or “the public body votes on legislation and the [members’] individual votes” are “posted promptly on the Internet.” § 3-306(b).²⁴ Public bodies must retain meeting minutes and recordings for five years and, “[t]o the extent practicable,” must “post online the minutes or recordings” that they are required to retain. § 3-306(e). Meeting notices and closing statements for closed sessions must be retained for three years. See §§ 3-302(d), 3-305(d)(5). Additionally, public bodies must make an agenda available before they meet. For that requirement, see Chapter 2, Part D.

The provision for posting minutes allows “live and archived video or audio streaming of the open session is available” to be a substitute for the requirement to post minutes of meetings timely.

In my opinion, this provision is being abused by the Fire Commission of Prince Georges County.

At each monthly meeting of the Fire Commission, the Secretary of the Fire Commission submits minutes of the prior meeting for approval by the body.

PIA request for copies of those minutes result in no response or no records found. When confronted with a complaint, the Fire Commission adopted the position to post video of the meetings on YouTube.. In

doing so the Fire Commission, or someone with Prince George's County speaking for the Fire Commission took the position that by posting the Video, that Video would be the official record of the Fire Commission.

Using this provision of the Open Meeting Act the Prince George's County, The Fire EMS Department of Prince Georges County and the Fire Commission refuse to provide copies of Minutes, which do apparently exist by virtue of the Secretary actions.

While the availability of the video recording may satisfy the "as soon as practicable" provision, it should not be a shield to prevent disclosure of the Minutes.

The County taking the position that the recording is the official record of the Fire Commission actions, is problematic since the governing documents of the Fire Commission require written minutes.

The Minutes are required. The Minutes apparently exist (if the video is correct). This provision should not be a shield preventing disclosure.

And, just curious, does YouTube meet the Archived requirements of this legislation?

Thanks.

Bryan

Bryan Lau

[REDACTED]

[REDACTED]



August 14, 2026

Maryland Public Information Act Compliance Board
c/o Office of the Attorney General
200 St. Paul Place, 19th Floor
Baltimore, MD 21202

Sent via: piaopengov@oag.maryland.gov

Re: Recommendations for Changes to the Maryland Public Information Act

Dear Compliance Board Members:

Thank you for the opportunity to provide recommendations for the Board's annual consideration of public comments on the Maryland Public Information Act (MPIA). This letter is submitted jointly by the Public School Superintendents' Association of Maryland (PSSAM), and the Maryland Association of Boards of Education (MABE), who together represent Maryland's 24 public school superintendents and all 24 local boards of education, and the interests of local school systems who are directly responsible for fulfilling the obligations of the MPIA. Transparency in the operations that directly support Maryland's nearly 900,000 students, shepherd billions in taxpayer dollars, and maintain a robust teacher workforce is key to public trust.

The receipt of MPIA requests by local school systems has grown exponentially over the past several years. The ever-changing technological landscape – which has pushed well-beyond the mainly hard-copy format of records when the MPIA was originally envisioned – has also made these requests more voluminous and complex. While not unique to school systems, the time involved in processing MPIA requests weighs heavily on staff time and resources, taking away from our primary focus to provide quality public education.

Although there are a multitude of changes under Md. Code Ann., Gen. Prov. § 4-101 *et seq.* that may support more efficient processing of MPIAs for public agencies, ***today we write to focus on requests for purchasing information, particularly those for a commercial or solicitation purpose.*** Many school systems across Maryland have seen the number of requests in this area nearly double over the past two years, with some experiencing increases of threefold or more. In

smaller counties, these requests often account for the majority of all MPIA requests. Notably, just six weeks into fiscal year 2027 (beginning July 1, 2026), purchasing related requests in many counties are already surpassing the total number received during all of fiscal year 2026.

Anecdotally, these requests are often from multiple, and differing individuals at the same company. When school system MPIA staff reach out for processing and clarification, there are little to no responses, signaling they are likely driven by artificial intelligence (AI). National discussions note Maryland schools and universities are not alone in being the target of “data farming” requests, even when not AI-driven, where the ultimate intent is to [collect and aggregate institutional data for profit](#). The type of records sought include mass production of contracts, purchase orders, and invoices, or databases containing information from these records, which can all contain detailed financial information that could be used to target both school systems and the vendors for fraudulent purposes.

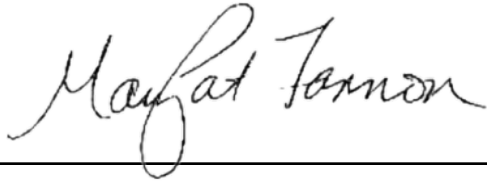
Other states are beginning to address this very type of request through changes in public records statute. See, e.g., [Indiana](#), [New Mexico](#), [Ohio](#). ***Considerations for Maryland could include commercial requester identification for purposes of increased fees, longer processing times, or the ability to deny mass requests outright. Alternatively, the statute could be amended to identify specific categories of purchasing information or records that are considered sensitive to fraud risk, and permit denial of disclosure for those categories.***

From a broader lens, the uptick in these requests also begs the consideration of a “modernization study” for the MPIA statute. For most of the MPIA’s history, the records created by a government agency in the course of business were relatively limited –formal letters, a few memoranda on high level topics, final student attendance and grade records in the case of schools, basic budget/financial history and contracts, and personnel files. With the advent of email, messaging platforms, extensive data storage, and easy video production, the demands under the MPIA exceed the capacity of most local school systems.

A modernization study would not seek to limit access to documents, which would be contrary to the purpose of the law, but rather look at unanticipated burdens in the advent of modern communication and public access. When enacted, the MPIA did not anticipate the magnitude of the types and volume of records maintained. A strict 30-day deadline, for instance, does not reflect the fact that a request can range from seeking one single document to seeking thousands of emails. Given the breadth of available records, the current statute also does not take into account overbroad requests that lack specificity, such as the many commercial requests school systems regularly receive for “any and all” purchasing records. While agencies can pause the clock when seeking clarification, this portion of the processing often takes a significant amount of staff time and resources.

Should the Compliance Board have interest in this topic for consideration in your annual report, please reach out at your convenience to marypat.fannon@pssam.org or smathias@mabe.org.

Sincerely,



Mary Pat Fannon
Executive Director, Public School
Superintendents' Association of
Maryland



Sam Mathias
Deputy Director of Association Programs,
Maryland Association of Boards of
Education

Cc: Maryland Local Superintendents