CITY OF LEBANON AUTHORITY
Right-to-Know Law Policy

(Adopted June 8, 2026, pursuant to 65 P.S. § 67.504(a))
Effective Date: June 8, 2026

I. Authority

The City of Lebanon Authority ("Authority") adopts this policy pursuant to Section 504(a) of the Right-to-Know Law, 65 P.S. §§ 67.101-67.3104 ("RTKL"). The Authority has made this policy available to the public at its administrative office, and on its public website, along with a RTKL Request form or the RTKL Uniform Request Form. *See* 65 P.S. § 67.504(b) (relating to agency posting requirements under the RTKL).

II. Definitions

All of the definitions set forth in the RTKL are incorporated into this policy by reference. *See* 65 P.S. § 67.102.

AORO. The Authority Open Records Officer designated by the Authority pursuant to Section IV of this policy.

Business day. The regular business hours of the Authority are ***Monday through Friday from 8:00 am to 4:00 pm***. Business days exclude Saturday and Sunday and a weekday on which the Authority is closed for business.

III. Authority Website

The Authority maintains a public website at ***www.lebanonauthority.org***. The following information is also posted on the Authority's website: AORO contact information; contact information for the OOR; a form which may be used to file a RTKL request; and a copy of this policy. *See* 65 P.S. § 67.504(b) (relating to agency posting requirements under the RTKL).

IV. Submitting a RTKL Request to the Authority

A. *Open Records Officer*. The Authority has designated an AORO to respond to RTKL requests.

The contact information for the AORO is:

Tom Deitzler, AORO
By Mail or In Person: ***City of Lebanon Authority, 2311 Ridgeview Road, Lebanon, PA, 17042***
Phone: ***717-272-2841***
Fax: ***717-675-2121***
Email: ***tdeitzler@lebanonauthority.org***

The contact information for the AORO is posted on the Authority website.

B. *Request*. Requests must be submitted in writing using the Authority's RTKL Request Form or the RTKL Uniform Request Form and must be addressed to the AORO. If a requester chooses not to use RTKL Request Forms, the request will be considered an informal request, not subject to the RTKL. This means that the requester cannot pursue the relief and remedies provided for in the RTKL. To allow the Authority to locate requested records and determine whether those records are public, requests for records should be specific and concise and clearly identify, as precisely as possible, the records sought. See 65 P.S. § 67.703. Requesters should clearly indicate the preferred method of access – paper copies, electronic copies or by inspection. A requester should retain a copy of the request, as a copy of the request is necessary should a requester appeal the Authority response.

C. *Receipt of the request*. For the purpose of calculating the response deadline, the Authority is deemed to have received the request on the business day that the AORO receives the request. *See* 65 P.S. § 67.901. Any request that is received by the Authority after the close of regular business hours shall be deemed to be received on the next business day. If the request is received by an Authority employee other than the AORO, the request will be forwarded to AORO as soon as practical.

D. *Verbal requests*. The Authority will respond to verbal requests for records at its discretion. Requesters submitting verbal requests for records should be aware that they may not pursue the remedies available to a requester under the RTKL.

E. *Anonymous requests*. The Authority will not respond to anonymous requests for records.

F. *Response period generally*. The Authority has 5 business days to respond to a request for records under the RTKL. If the Authority does not respond, the request is considered "deemed denied," and a requester's appeal rights commence.

V. Authority's Response

A. *Extension of time for response*. The Authority is permitted to take an additional 30 calendar days to respond to any request for the reasons set forth in Section 902 of the RTKL. *See* 65 P.S. § 67.902. If the Authority invokes an extension, the Authority will inform the requester in writing, in accordance with the requirements set forth in Section 902(b)(2) of the RTKL.

B. *Requester's agreement to extend the response period*. The requester may agree, in writing, to extend the Authority's response period. *See* 65 P.S. § 67.902(b)(2). The requester must agree to the extension during the initial 5 business-day response period or the extended 30 calendar day response period, if the Authority has invoked one.

C. *Trade secrets*. If a request involves records provided to the Authority by a third party and the third party previously provided the Authority with a written statement that the record contains a trade secret or confidential proprietary information, the Authority shall provide notice to the third party. *See* 65 P.S. § 67.707(b).

D. *Final response*. The Authority may grant a request, partially grant and partially deny a request, or deny a request in its entirety. The final response of the Authority will be in writing. Should the Authority fail to issue a response within the applicable response period, the request is deemed denied. *See* 65 P.S. § 67.901.

1. *Granting access to records*. The Authority may grant a request for records by issuing a response: (1) granting access to inspect Authority records during the Authority's regular business hours; (2) sending copies of the records to the requester; or (3) by notifying the requester that the records are available on the Authority's website or other publicly accessible electronic means. *See* 65 P.S. §§ 67.701(a), 704.

2. *Denying or partially denying access to records*. Should the Authority deny or partially deny a request for records through redaction or otherwise, the Authority will inform the requester of the denial or partial denial in writing. The response will describe the requested records, inform the requester that the Authority does not possess the responsive records or, if the records are exempt from public access, provide a citation to the relevant legal basis for withholding the requested records. *See* 65 P.S. § 67.903. Additionally, the response will provide the name, signature, title, business address and telephone number of the Open Records Officer who denied the request, as well as the date of the response and the procedure to appeal the denial. *See* 65 P.S. § 67.903.

E. *Fees*. The Authority will charge fees consistent with the RTKL Fee Structure, available at http://www.openrecords.pa.gov/RTKL/FeeStructure.cfm.

The Authority may, in its discretion, choose to waive some or all of the fees owed on a case-by-case basis.

VI. RTKL Appeals

A. *Generally*. To challenge the denial, partial denial, or deemed denial of a request for Authority records, an appeal may be filed using the OOR appeal form, available at http://www.openrecords.pa.gov/Appeals/AppealForm.cfm, or by contacting the OOR at the following address:

Office of Open Records
Commonwealth of Pennsylvania
555 Walnut Street, Suite 605
Harrisburg, PA 17101-1925

B. *Requirements of an appeal*. All appeals must be filed within 15 business days of the mailing date of the Authority's denial, partial denial, or deemed denial of the request. All appeals must be in writing or submitted electronically; must state the grounds upon which the requester asserts that the requested records are public records; must address any grounds stated by the Authority for denying the request; and must include a copy of the request and the Authority's response, if any. *See* 65 P.S. § 67.1101(a)(1).

VII. Authority Notification of Third Parties on Appeal

Authority must notify third parties. If records affect a legal or security interest of an employee of the agency; contain confidential, proprietary or trademarked records of a person or business entity; or are held by a contractor or vendor, the Authority must notify such parties of the appeal immediately and provide proof of that notice to the OOR within 7 business days from the date of the OOR's Official Notice of Appeal. Such notice must be made by (1) providing a copy of all documents included with the appeal to the OOR; and (2) advising that interested persons may request to participate in the appeal. *See* 65 P.S. § 67.1101(c).

VIII. Mediation

The RTKL requires the OOR to establish an informal mediation process to resolve disputes under the RTKL. 65 P.S. § 67.1310(a)(6). This is a voluntary process to help parties reach a mutually agreeable settlement on records disputes before the OOR. Mediation, a facilitated conversation between the parties that can serve as a fair and efficient tool to resolve conflict, can save time and expense. When appropriate, the Authority is open to resolving RTKL disputes through the OOR's mediation process.

IX. Record Retention

Once a RTKL request is received, the Authority shall maintain, preserve, retain, protect, and not destroy any and all records, both electronic and hard copy, that are potentially responsive to the request until such time as the request is fulfilled and all associated appeals are resolved.

X. Additional Information about the RTKL

Additional information about the RTKL, the request process, and the appeal process is available on the OOR website at https://www.openrecords.pa.gov.