



pennsylvania

OFFICE OF OPEN RECORDS

FINAL DETERMINATION

IN THE MATTER OF

**JAMES CRISTEA,
Requester**

v.

**BRISTOL TOWNSHIP
SCHOOL DISTRICT,
Respondent**

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Docket No.: AP 2022-1610

INTRODUCTION

James Cristea (“Requester”) sent a request (“Request”) to the Bristol Township School District (“District”) pursuant to the Right-to-Know Law (“RTKL”), 65 P.S. §§ 67.101 *et seq.*, seeking swipe card information regarding an identified employee. The District denied the Request as a risk to personal safety and as relating to a noncriminal investigation, and the Requester appealed to the Office of Open Records (“OOR”). For the reasons set forth in this Final Determination, the appeal is **denied**, and the District is not required to take any further action.

FACTUAL BACKGROUND

On June 7, 2022, the Request was filed, seeking:

1. AESOP/Frontline clock in/clock out time records for Truman Head Secretary, Kathy Armstrong for 5/9/22 to 6/3/22 (PDF of original record)[.]
2. AESOP/Frontline clock in/clock out time records for Truman Head Secretary, Kathy Armstrong for 4/1/2022 (PDF or original record)[.]

3. Normal daily start and end time for Kathy Armstrong during the school year.
4. Hours worked at regular pay before overtime is paid for Kathy Armstrong.

On July 7, 2022, following a thirty-day extension, 65 P.S. § 67.902(b), the District granted Items 3 and 4 of the Request, but denied Items 1 and 2 as seeking records which would endanger personal security, 65 P.S. § 67.708(b)(1)(ii), the state constitutional right to privacy, and because they relate to a noncriminal investigation. 65 P.S. § 67.708(b)(17).

On July 7, 2022, the Requester appealed to the OOR, seeking only records responsive to Items 1 and 2 of the Request. The OOR invited the parties to supplement the record and directed the District to notify third parties of their ability to participate in the appeal. *See* 65 P.S. § 67.1101(c).

On July 10, 2022, the Requester submitted a position statement arguing that the District could not prove a substantial and demonstrable risk of harm.¹ The Requester argues that the Request seeks only past information and cannot create any future harm, and that the District has not conducted any investigation.

On July 28, 2022, the District submitted a position statement arguing that while the District had answered the Requester's previous RTKL request and portions of this Request for records of Ms. Armstrong, the records sought in Items 1 and 2 would permit a member of the public to confront Ms. Armstrong when she entered or left the building, that District employees were commonly the targets of violence by students or parents, and that the Requester and Ms. Armstrong had recently had a "deterioration" in their "professional relationship" to the point where Ms. Armstrong does not wish to speak to the Requester without an additional person present. The District further argued that the Requester had failed to address the matter of state constitutional

¹ The Requester cites to the District's denial under 65 P.S. § 67.708(b)(2); however it appears that he meant to argue regarding the application of 65 P.S. § 67.708(b)(1).

protections, and that such protections apply. In support of these arguments, the District submitted the verification of the District's Business Manager, Joshua Sweigard, who attests that the purpose of the swipe system was to trace employees in the event of an emergency, not for attendance tracking or salary purposes. The District also submitted the verification of David Jayne, the District's Security Coordinator, who attests that the Frontline system swipes were developed to permit the District to quickly discern the locations of staff in the event of emergencies, and later used for contact tracing for Covid-19, and that release of this data to the public would create a substantial and demonstrable risk to the employee. The District additionally submitted the verification of Interim Superintendent Christopher Polzer, who attests that the clock-in and clock-out data is tracked only for safety purposes, and that release would be dangerous in this case because of unspecified events between the Requester and Ms. Armstrong. Finally, the District submitted the verification of Kathy Armstrong, Secretary of the Principal of Harry S. Truman High School, who attests that she is a salaried employee who works from 7:00 AM to 3:00 PM daily, but she regularly enters and exits the school at different times, and that she has a poor relationship with the Requester, and she opposes release of records showing the times she is physically present at the school.

LEGAL ANALYSIS

“The objective of the Right to Know Law ... is to empower citizens by affording them access to information concerning the activities of their government.” *SWB Yankees L.L.C. v. Wintermantel*, 45 A.3d 1029, 1041 (Pa. 2012). Further, this important open-government law is “designed to promote access to official government information in order to prohibit secrets, scrutinize the actions of public officials and make public officials accountable for their

actions.” *Bowling v. Office of Open Records*, 990 A.2d 813, 824 (Pa. Commw. Ct. 2010), *aff’d* 75 A.3d 453 (Pa. 2013).

The OOR is authorized to hear appeals for all Commonwealth and local agencies. *See* 65 P.S. § 67.503(a). An appeals officer is required “to review all information filed relating to the request” and may consider testimony, evidence and documents that are reasonably probative and relevant to the matter at issue. 65 P.S. § 67.1102(a)(2). An appeals officer may conduct a hearing to resolve an appeal. The decision to hold a hearing is discretionary and non-appealable. *Id.* Here, neither party requested a hearing.

The District is a local agency subject to the RTKL that is required to disclose public records. 65 P.S. § 67.302. Records in the possession of a local agency are presumed to be public, unless exempt under the RTKL or other law or protected by a privilege, judicial order or decree. *See* 65 P.S. § 67.305. Upon receipt of a request, an agency is required to assess whether a record requested is within its possession, custody or control and to respond within five business days. 65 P.S. § 67.901. An agency bears the burden of proving the applicability of any cited exemption(s). *See* 65 P.S. § 67.708(b).

Section 708 of the RTKL places the burden of proof on the public body to demonstrate that a record is exempt. In pertinent part, Section 708(a) states: “(1) The burden of proving that a record of a Commonwealth agency or local agency is exempt from public access shall be on the Commonwealth agency or local agency receiving a request by a preponderance of the evidence.” 65 P.S. § 67.708(a). Preponderance of the evidence has been defined as “such proof as leads the fact-finder ... to find that the existence of a contested fact is more probable than its nonexistence.” *Pa. State Troopers Ass’n v. Scolforo*, 18 A.3d 435, 439 (Pa. Commw. Ct. 2011)

(quoting *Pa. Dep't of Transp. v. Agric. Lands Condemnation Approval Bd.*, 5 A.3d 821, 827 (Pa. Commw. Ct. 2010)).

1. The appeal is valid under Section 1101(a) of the RTKL

The District argues on appeal that the Requester did not address one of the District's grounds for denial—specifically, the state constitutional right to privacy—and therefore, the appeal must be dismissed. Pursuant to Section 1101 of the RTKL, a requester “must state the grounds upon which the requester asserts that the record is a public record... and... address any grounds stated by the agency for delaying or denying the request.” 65 P.S. § 67.1101(a)(1); *see also Pa. Dep't of Corr. v. Office of Open Records*, 18 A.3d 429, 434 (Pa. Commw. Ct. 2011) (“[I]t is appropriate and, indeed, statutorily required that a requester specify in its appeal to Open Records the particular defects in an agency's stated reasons for denying a RTKL request”); *Saunders v. Pa. Dep't of Corr.*, 48 A.3d 540, 543 (Pa. Commw. Ct. 2012) (holding that a requester must “state why the records [do] not fall under the asserted exemptions and, thus, [are] public records subject to access”).

In this instance, the Requester filed the appeal using the OOR's standard electronic appeal form, which provides that by submitting the form, the Requester is “appealing the [District's] denial, partial denial, or deemed denial because the requested records are public records in the possession, custody or control of the [District]; the records do not qualify for any exemptions under § 708 of the RTKL, are not protected by a privilege, and are not exempt under any Federal or State law or regulation; and the [R]equest was sufficiently specific.” *See Barnett v. Pa. Dep't of Pub. Welfare*, 71 A.3d 399 (Pa. Commw. Ct. 2013). Moreover, the OOR has consistently found that this statement is sufficient to satisfy a requester's burden under Section 1101(a) of the RTKL. 65 P.S. § 67.1101(a)(1); *see also, e.g., Phillips and WHYY v. Pa. Dep't of Env'tl. Prot.*, OOR Dkt. AP

2016-1782, 2017 PA O.O.R.D. LEXIS 222; *Tomassi v. Municipality of Mt. Lebanon*, OOR Dkt. AP 2017-0644, 2017 O.O.R.D. LEXIS 896; *Brock v. Bucks County*, OOR Dkt. AP 2022-1118, 2022 PA O.O.R.D. LEXIS 1653. Accordingly, by using the OOR's standard appeal form, the Requester has sufficiently challenged the District's denial of the requested records, and the OOR will reach the merits of the appeal.

2. The District has demonstrated that the responsive records are reasonably likely to endanger personal safety in this appeal

The District argues that the responsive swipe records are exempt under Section 708(b)(1)(ii) of the RTKL, which exempts from disclosure a record that “would be reasonably likely to result in a substantial and demonstrable risk of physical harm to or the personal security of an individual.” 65 P.S. § 67.708(b)(1)(ii). To establish that this exemption applies, an agency must show: (1) a “reasonable likelihood” of (2) “substantial and demonstrable risk” to a person’s security. *Del. County v. Schaefer*, 45 A.3d 1149 (Pa. Commw. Ct. 2012). The OOR has held that “[b]elief alone without more, even if reasonable, does not meet this heightened standard.” *Lutz v. City of Phila.*, 6 A.3d 669, 676 (Pa. Commw. Ct. 2010) (holding that “[m]ore than mere conjecture is needed” to establish that this exemption applies).

In support of these arguments, the District submitted several verifications, including that of District Security Coordinator Jayne, who attests that:

2. I am currently employed by the Bristol Township School District (the “District”) as its District Security Coordinator. I have served in this position for twelve (12) [years]. I have been a School Police Officer for the District for twenty (20) years. I also serve as the Safety and Security Coordinator for the District under Act 44 and have so served for the last four years. I am a law enforcement officer under the Public School Code of 1949 and am Act 120 certified.

3. I am a certified ALiCE instructor, which involves training others to respond to violence or threats, including active shooters, and am a member of the Threat Assessment Administrative Team for the District. I am also a Stop the Bleed and Sudden Cardiac Arrest Instructor, involving training for first response for necessary

medical intervention. I have completed training through the National Association of School Resource Officers (NASRO), which included training on various public safety topics, as well as training on the best practices for de-escalation, behavioral threat assessment, emergency operations planning, and armed assailant response.

4. Moreover, prior to my employment with the Bristol Township School District, I served as a police officer with the Bristol Township Police Department for approximately 11 years.

5. As District Security Coordinator, I am responsible for ensuring a safe and secure environment for all students, employees and visitors, as well as for protecting [D]istrict buildings, equipment and property. I enforce the safety and security protocols of the District, including those involving fire and other emergency response situations, during school hours, administration hours, at public events, sports events, and other extracurricular school district activities that occur on school property. I also make recommendations for improvements to the District's safety management and emergency preparedness, implement procedures to prevent and deter violence at the schools and on District property, and coordinate with the Bristol Township Police Department and other health and safety professionals in matters involving public safety and the safety students and employees.

8. Beginning on or about the summer of 2018, in response to the Parkland, Florida shooting and other incidents of school violence, I participated in discussions with the District's Administration concerning ways to improve school security, which included discussion on ways to have access to location information of students and District employees, including teachers in the event of an emergency, including the aforementioned emergency situations.

9. As a result of these discussions, the District began using the Frontline management system for its security plan, wherein salaried employees, for the first time, were required to swipe their identification cards each time they entered or left their respective buildings. The data from this swipe-in procedure is now used for the purpose (if necessary) of monitoring the whereabouts of the employees, particularly in the event of an emergency situation, and also for recording attendance. The Frontline system was also used for contact tracing purposes of the Covid-19 virus.

10. For hourly employees, a laptop computer is used rather than the swipe sensor system that the salaried employees use.

11. Access to the information stored in the Frontline system is restricted and accessible only to certain Administrative personnel. Each employee, either hourly or salaried, does have access to his or her own personal time data. However, non-Administrative employees do not have access to any other employee's data.

14. As mentioned above, salaried employees must now swipe-in every time they enter a building and swipe-out every time they leave a building. The methods currently employed by the District allow me, in the event of an emergency, [to] determine what employees and students are present in a specific building at any particular time.

15. In June 2022, I was made aware of the Right-to-Know Request by District High School Teacher James Cristea for High School Principal Secretary Kathy Armstrong's "clock in/clock-out" time for various dates that is stored in the Frontline management system.

16. Based on my training and experience, the public disclosure of the "clock-in/clockout" times of Kathy Armstrong, or any District employee, would threaten the public safety, preparedness and security of the District's schools.

17. The public disclosure of the "clock-in/clock-out" times of Kathy Armstrong would also create an undue risk to Ms. Armstrong's personal security.

18. As stated above, the purpose of "clock-in/clock-out" or the swipe-in/swipe-out requirement for salaried employees, was for tracking the whereabouts of the employees in a particular District building for safety and security purposes in the event of an emergency. Publicly releasing this information would serve to defeat the purpose behind this tracking, i.e. the physical safety/security of the staff and students, as described further below.

19. Public access to a salaried employee's time-in and time-out schedule, which, for administrative staff may very well include hours outside of the regular school hours and the normally scheduled workday for which salaried employees are paid, will reveal any practice and/or pattern of the employee as to his or her presence at a particular District building. The public availability of this information will allow any individual who wished to harm a specific employee, or a student by implication, to, generally, anticipate and predict where and when a target will be present at a particular time.

20. Moreover, the public availability of this information for multiple salaried employees, including teachers, administrators, administrative and support staff, and most of the employees of the District, reveals the movement of District employees, which would include class times, break times, and, by implication, student movement. Therefore, release of this information to the public would also make this information available to individuals who may engage or attempt to engage in violent behavior at the District. Such individuals could then, in turn, use this information to maximize the intended violence, including maximizing the number of casualties, for example, in a shooting incident.

21. School violence is not a new phenomenon. As reported through the media, there

have been approximately twenty-seven (27) shootings nationally in K-12 schools in 2022, to date, alone. Further, based on my training, experience, continuing education and related updates, threatening violence occur frequently by students or parents in public schools, with many of the victims or targets being professional staff, such as administrators, teachers, counselors, and secretaries. These are the staff members that have the most contact with students and parents making the possibility of that person becoming a target of violence greater.

22. Also, based upon my training and experience, a staff member is more vulnerable to violence if a perpetrator knows the timing and movements of his/her potential victim, such as when a staff member arrives or exits the building for the day. This is especially true where a staff member works outside regular school hours, as these “overtime” hours tend to follow patterns based on the individual’s preference and specific monthly and annual needs of the District. Knowing the approximate time, or pattern, of when a staff member may arrive for work and leave the building, along with the general area in which the staff member parks on school property, would give a perpetrator an advantage. Releasing such information publicly may realistically create a dangerous situation for the staff member and lead to a potential violent incident.

23. Therefore, the public disclosure of the “clock-in/clock-out” times of Ms. Armstrong is reasonably likely to result in a substantial and demonstrable risk to her personal security and threatens the safety and preparedness of the District’s schools, students and staff.

The District also submitted the verification of Ms. Armstrong, who attests that:

3. My duties as Mr. Craig’s secretary involve providing support to Mr. Craig in the administration of the High School, including: scheduling and maintaining appointments; purchasing materials, supplies and equipment for the school and maintaining records in connection to same; recording and depositing monies as necessary; distributing materials and other information to teachers, students and other staff members; and other administrative support functions as needed or requested by Mr. Craig.

4. I am, and have been, a salaried employee. My normal work hours are from 7:00 AM to 3 :00 PM, Monday through Friday; however, my actual hours may exceed, and have many times exceeded, my normal workday hours, in order to complete my duties and various tasks or as needed by Mr. Craig or the District.

5. As a salaried employee, I do not receive overtime.

6. Beginning September 2019, I, along with teachers, staff and other professionals in the District, began using a procedure whereby I swiped my identification card each workday at a sensor located near the entryways to the High School indicate my attendance at the High School. Thereafter, beginning with the 2021-2022 school

year, I, along with other District employees, began using the swipe card procedure to “swipe-in” every time we entered the High School building and to “swipe-out” each time we exited the building.

7. My understanding is that the current card-swipe procedure is being used by the Administration so that it is able to determine the location of each employee, if such information is necessary, for example, in case of an emergency.

8. I am aware of the Right-to-Know Requests made to the District by Truman High School Teacher James Cristea, wherein he has certain information from my records in the District's files, including my “clock-in” and “clock-out” records, as well as a copy of my W-2 statements.

9. Since April 2022, any professional relationship between Mr. Cristea and myself has deteriorated. I am and have been since that time apprehensive of speaking or communicating with him in person without another person present.

10. I do not want any record of the actual times that I am physically present at the High School released to Mr. Cristea or to the public.

Under the RTKL, a verification may serve as sufficient evidentiary support for the withholding of responsive records. *See Sherry v. Radnor Twp. Sch. Dist.*, 20 A.3d 515, 520-21 (Pa. Commw. Ct. 2011); *Moore v. Office of Open Records*, 992 A.2d 907, 909 (Pa. Commw. Ct. 2010). In the absence of any competent evidence that the District acted in bad faith, “the averments in [the verifications] should be accepted as true.” *McGowan v. Pa. Dep’t of Env’tl. Prot.*, 103 A.3d 374, 382-83 (Pa. Commw. Ct. 2014) (citing *Office of the Governor v. Scolforo*, 65 A.3d 1095, 1103 (Pa. Commw. Ct. 2013)).

As noted above, to show that these records are exempt, the District must show two things; that there is a reasonable likelihood of harm, and that the risk of harm is demonstrable and substantial. Here, the District has submitted two separate but complementary bases for a finding of likely harm. First, the District argues that public school employees are subject to a heightened risk of violence from students or parents, citing to the relative frequency of violence in schools. Second, the District provides evidence that an unspecified event or events have caused the

“professional relationship” between the Requester and Ms. Armstrong to dissolve and evinces concern that the Requester may be trying to gather information to aid him in confronting her.

On appeal, the Requester raises two relevant arguments. First, he argues that the exemption cannot be supported because the Request pertains only to Ms. Armstrong’s past work, and that the District has provided other scheduling information on request. Second, he argues that some specific reason for security concerns must be established.

Here, the Request is seeking a set of “clock-in, clock-out” records which show the times Ms. Armstrong swiped in and swiped out of the building each day. As a rule, work schedules for an employee are public; however, the OOR has previously found that disclosure of past scheduling records may enable threats to an employee where there is sufficient reason to believe that such threats exist, and the pattern of those scheduling records might reveal the employee’s future location. *See Oser v. Pocono Mountain Regional Police Dep’t*, OOR Dkt. AP 2017-1419, 2017 PA O.O.R.D. LEXIS 1409 (finding disclosure of certain information from daily activity sheets, i.e. location and identity of an officer assigned to an assignment, patrol patterns, and number of officers assigned to a location, would threaten public safety); *Varley v. Beaver County*, OOR Dkt. AP 2010-0582, 2010 PA O.O.R.D. LEXIS 505 (denying access to police schedules and duty rosters under Section 708(b)(2)); *Walker v. Macungie Police Dep’t*, OOR Dkt. AP 2009-0509, 2009 PA O.O.R.D. LEXIS 229 (finding that past work schedules of officers would indicate future police coverage and threaten public safety). Furthermore, the District has already provided scheduling and wage records showing the hours Ms. Armstrong is required to work; it objects only to providing the records showing when Ms. Armstrong regularly enters and leaves the building. As the District persuasively argues and attests, these “clock-in, clock-out” records are kept for the purpose of security and do not show whether she is performing her duties, or serve any valid public

purpose which is not served by provision of her schedule, but merely permit individuals in possession of these records to identify exactly when she is likely to be entering or leaving the school building.

Relevant to the District's concerns regarding the Requester specifically, the OOR generally cannot consider the identity of the filer of an RTKL request. *See Advancement Project v. Pa. Dep't of Transp.*, 60 A.3d 891 (Pa. Commw. Ct. 2013); *Padgett v. Pa. State Police*, 73 A.3d 644, 647 (Pa. Commw. Ct. 2013). In prior cases involving particularized concerns regarding a requester under the RTKL, the OOR has relied upon judicial actions, such as prior convictions or active protective orders, to determine if a particular filer is barred from receiving particular information. *See City of Phila. v. Barosh*, 189 A.3d 31 (Pa. Commw. Ct. 2018) (affirming "the trial court's consideration of [the requester's] identity as a convicted arsonist and the perceived purpose of his RTKL requests"); *McClain v. The Community College of Phila.*, OOR Dkt. AP 2022-0521, 2022 PA O.O.R.D. LEXIS 815 ("This information is plainly a public record and is published by the College, but it is also unclear what purpose the [r]equest could have other than the violation of the protective order."). Here, there is no evidence that any sort of judicial process bars the Requester from any responsive public record, and therefore, the RTKL explicitly affords him the same access to public records that any other requester would enjoy.

Nevertheless, Ms. Armstrong's testimony, along with the expert opinion of Officer Jayne, are relevant in establishing whether these specific records are exempt from production to *any* requester under the RTKL. Here, the District has submitted evidence showing that Ms. Armstrong, along with District officials, have a heightened concern for Ms. Armstrong's safety due to unspecified events. The District has additionally submitted evidence, through Officer Jayne, that public school staff already face a heightened risk of violence from the student body. The evidence

presented does not establish that school employees always face a heightened risk, as employees in law enforcement or prison settings do, but the District has not made any sort of sweeping claim that records involving Ms. Armstrong are generally exempt for that reason. *Carey v. Pa. Dep't of Corr.*, 61 A.3d 367, 375 (Pa. Commw. Ct. 2013). The District has already produced a wide variety of records involving Ms. Armstrong's employment to the Requester, as required by the RTKL. Instead, the District argues only that the check-in/check-out records serve no purpose except permitting individuals to guess when an employee will be alone, outside the building.²

In *Pecarchik v. Westmoreland County*, the OOR addressed a request for an employee's swipe card logs from 2016-2019. OOR Dkt. AP 2019-2639, 2020 PA O.O.R.D. LEXIS 2075. In that case, the agency raised Section 708(b)(1) of the RTKL but provided evidence only that "a recent bomb threat at the Courthouse required evacuation" and speculation that release of the information could permit an unauthorized individual to follow authorized individuals in surreptitiously. *Id.* The OOR rejected this rationale, holding that the County had failed to identify any reason to believe that there was a particular risk to that employee, and failed to tie the bomb threat to the swipe card records in any meaningful way. *Id.* The OOR distinguished *Pecarchik* from a previous holding in *Kauffman v. County of York*, noting in part that *Kauffman* involved an attestation that there had been specific threats to the users of the swipe card system. OOR Dkt. AP 2013-1873, 2013 PA O.O.R.D. LEXIS 1113.

Here, the District attests that there is a heightened concern regarding Ms. Armstrong's security specifically. Furthermore, the District has provided the Requester with relevant

² Under the RTKL, the Requester is not required to provide an explanation for how he intends to use these records, and the District may not deny them on that basis alone. 65 P.S. § 67.302(b) ("A local agency may not deny a requester access to a public record due to the intended use of the public record by the requester unless otherwise provided by law"); 65 P.S. § 67.703 ("A written request need not include any explanation of the requester's reason for requesting or intended use of the records unless otherwise required by law"). However, where the agency argues persuasively that there is no non-threatening purpose for the records, it is relevant to note that no alternate purpose has been proposed by any party.

scheduling and employee information which might be in the public interest - it has denied these swipe card records specifically because they only enhance the safety concerns articulated. Because the requested records relate to an articulated security concern regarding Ms. Armstrong, the instant appeal is more analogous to the facts in *Kauffman* than *Pecarchik*, and the District has demonstrated in this appeal that Items 1 and 2 of the Request seek records which would be reasonably likely to result in a substantial and demonstrable risk of physical harm to or the personal security of an individual. Therefore, the Request seeks records exempt under Section 708(b)(1)(ii) of the RTKL, and the appeal must be denied.

CONCLUSION

For the foregoing reasons, the Requester's appeal is **denied**, and the District is not required to take any additional action. This Final Determination is binding on all parties. Within thirty days of the mailing date of this Final Determination, any party may appeal to the Bucks County Court of Common Pleas. 65 P.S. § 67.1302(a). All parties must be served with notice of the appeal. The OOR also shall be served notice and have an opportunity to respond according to court rules as per Section 1303 of the RTKL. However, as the quasi-judicial tribunal adjudicating this matter, the OOR is not a proper party to any appeal and should not be named as a party.³ This Final Determination shall be placed on the OOR website at: <http://openrecords.pa.gov>.

FINAL DETERMINATION ISSUED AND MAILED: September 16, 2022

/s/ Jordan C. Davis

Jordan C. Davis, Esq.
Appeals Officer

Sent to: James Cristea (via email only);
Karen Diaz, Esq. (via email only)

³ See *Padgett v. Pa. State Police*, 73 A.3d 644, 648 n.5 (Pa. Commw. Ct. 2013).