

UTAH STATE DEVELOPMENTAL CENTER POLICY AND PROCEDURE MANUAL		
HIPAA PRIVACY RIGHTS OF INDIVIDUALS		PAGE 1 OF 11
DIRECTIVE: 70.02	EFFECTIVE DATE: April 14, 2003	REVISION DATE: 9/20/2010
REVIEWING ENTITY: HIPAA COMMITTEE		
PURPOSE: Individuals at the Utah State Developmental Center (“USDC”) have the right to access, inspect, amend, and obtain a copy of their protected health information consistent with certain limitations, and they may file a complaint if they feel those rights have been violated, in accordance with the Health Insurance Portability and Accountability Act (HIPAA) and Health Information Technology for Economic for Clinical Health Act” (HITECH).		
AUTHORITY REFERENCE: HEALTH INSURANCE PORTABILITY & ACCOUNTABILITY ACT OF 1996, 45 C.F.R. §164.522, 164.524, 164.526, and 164.528 and Health Information Technology for Economic for Clinical Health Act (HITECH). See American Recovery and Reinvestment Act of 2009, §13400 (P.L. 111-115); 45 CFR § 164.400-164.414.		

Policy:

1. General

- a. Individuals have the right to:
 - i. Access, inspect and obtain a copy of their protected health information, consistent with certain limitations;
 - ii. Receive a list of disclosures the Utah State Developmental Center (“USDC”) has made of their protected health information for up to six years prior to the date of the request.
 - iii. Submit complaints if they have reason to suspect that information about them has been improperly used or disclosed, or if they have concerns about the privacy policies of USDC; and
 - iv. Be notified in writing, without unreasonable delay and in no case later than 60 calendar days after discovery, of any reportable breaches of their protected health information.

- b. Individuals may ask USDC to take specific actions regarding the uses and disclosures of their protected health information, and USDC may either approve or deny the request. Specifically, individuals have the right to request:
 - i. Restrictions on the uses and disclosures of their protected health information regarding USDC treatment, payment activities, or health care operations;
 - ii. Protected health information be provided by alternate means, such as mail, e-mail, fax or telephone, or at alternate locations; and
 - iii. Amendments to correct inaccurate or incomplete protected health information held by USDC.

- c. Notice of Privacy Practices. (45 CFR 164.520)
 - i. USDC will use the, “Utah State Developmental Center Notice of Privacy Practices,” to inform individuals about how USDC may use and/or disclose their protected health information. The “Notice of Privacy Practices” also describes the actions an individual may take, or request USDC to take, with regard to the uses and/or disclosures of their protected health information.

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 2 OF 11

- ii. The Notice will be:
 - A. Provided to all individuals or their personal representatives no later than the first day of service; **Exception:** In emergency treatment situations, the Notice should be provided as soon as reasonably practicable after the emergency has ended;
 - B. Prominently posted in each residential unit and in the admissions office;
 - C. Prominently posted on the USDC website; and
 - D. Provided to anyone who asks for it.
 - iii. USDC will request all individuals or personal representatives receiving the Notice to complete the “Acknowledgement of Receipt of Notice” form. If an individual or personal representative does not acknowledge receipt of the Notice, USDC will document its good faith efforts to obtain the Acknowledgement and shall record the reason why it was not obtained.
 - A. The “Acknowledgement of Receipt of Notice” will be filed in the individual’s case record.
 - iv. The privacy officer is responsible for ensuring the Notice is distributed, posted, and available as required.
- d. Decision-making authority within USDC.
- i. Prior to any decision, regarding an individual’s request for USDC to **amend** protected health information, the USDC superintendent, medical/clinical director, or a licensed health care professional designated by the program administrator, shall review the request and any related documentation. The licensed health care professional may be a USDC employee involved in the individual’s care.
 - ii. USDC may deny an individual access to his or her protected health information on the grounds that access is **reasonably likely to endanger the life and physical safety of the individual or another person**. USDC will not deny access merely on the basis of the sensitivity of the health information or the potential for causing emotional or psychological harm. However, prior to any decision to deny such access, the medical director, or a licensed health care professional designated by the program administrator, shall review the request and any related documentation. The licensed health care professional may be a USDC employee involved in the individual’s care.

Policy:

- 2. **Rights to request privacy protection of protected health information (45 CFR 164.522)**
 - a. Individuals have the right to request restrictions on the uses and/or disclosures of their protected health information.

Procedures:

- 1. **Requesting restrictions of uses and disclosures.**
 - a. Individuals may request that USDC restrict the uses and/or disclosures of their protected health information for:
 - i. Carrying out treatment, payment, or health care operations;

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 3 OF 11

- ii. Disclosing protected health information to a relative or other person who is involved in the individual's care.
- b. All requests for restrictions will be made by having the individual complete a "Restriction of Use and Disclosures Request Form."
- c. USDC is not required to agree to a restriction requested by the individual. **Exception:** Federal regulations (42 CFR, Part 2) prohibit USDC from denying a request for restrictions on the uses and disclosures of an individual's information regarding alcohol and drug treatment.
 - i. USDC will not agree to restrict uses or disclosures of information if the restriction would adversely affect the quality of the individual's care or services.
 - ii. USDC cannot agree to a restriction that would limit or prevent USDC from making or obtaining payment for services.
- d. USDC will document the individual's request for restrictions, and the reasons for granting or denying the request in the individual's case file.
 - i. Prior to any use or disclosure of protected health information, USDC staff must confirm that such use or disclosure has not been granted a restriction by reviewing the individual's case file.
- e. If USDC agrees to an individual's request for restriction, it will not use or disclose information in violation of the restriction. **Exception:** If an individual needs emergency treatment and the restricted information is needed to provide emergency treatment, USDC may use or disclose such information to the extent necessary to provide the emergency treatment. USDC shall request the emergency treatment provider not to use or disclose the protected health information further.
- f. USDC may terminate its agreement to a restriction if:
 - i. The individual agrees to or requests termination of the restriction in writing;
 - ii. The individual orally agrees to, or requests, termination of the restriction. USDC will document the oral agreement or request in the individual's case file; or
 - iii. USDC informs the individual in writing that it is terminating its agreement to the restriction. Information created or received while the restriction was in effect shall remain subject to the restriction.

Policy:

- 3. **Rights of individual to request to receive information from USDC by alternate means or at alternate locations.**
 - a. USDC must accommodate reasonable requests by individuals to receive communications by alternate means, such as by mail, e-mail, fax or telephone; and
 - b. USDC must accommodate reasonable requests by individuals to receive communications at an alternate location.

Procedures:

- 1. **Requesting alternate means or locations.**
 - a. The individual must specify the preferred alternate means or locations.
 - b. Requests for receiving communications via alternate means or at alternate locations may be made orally or in writing.

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 4 OF 11

- c. If an individual makes a request orally, telephonically, or electronically, USDC will document the request, verify the identity of the requestor.
- d. Prior to sending any protected health information to the individual, USDC must review the individual's case file and confirm if it has granted a request from the individual to receive communications at an alternate location or by alternate means.

Policy:

- 4. **Rights of individuals to access protected health information. (45 CFR 164.522)**
 - a. Individuals have the right to access, inspect, and obtain a copy of their protected health information maintained in a USDC-designated record set, except as described in Subsection b., below.
 - i. If USDC maintains information about the individual in a record that includes information about other people, the individual is only authorized to see information about himself or herself, except as provided below:
 - A. A minor's parent or legal guardian may obtain protected health information about a minor if authorized under Utah law. A parent or legal guardian may **not** have access to a minor's protected health information when the minor is emancipated or married; when a female minor seeks treatment in connection with her pregnancy or child birth; when a minor seeks treatment for a sexually transmitted disease; or when a court has given the minor the legal right to consent.
 - B. A guardian or legal custodian may obtain protected health information about an adult if the guardian or legal custodian is authorized by Utah law to have access to the adult's information or is otherwise authorized to act on behalf of the adult for making decisions about the adult's services or care.
 - C. Agencies established to advocate and protect the rights of individuals with developmental disabilities (under part C of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6041 et seq.)) or mental illnesses (under the Protection and Advocacy for Individuals with Mental Illness Act (42 U.S.C. 10801 et seq.)), shall have access to the records of their clients who have authorized access.
 - b. Individuals do not have the right to access the following types of protected health information:
 - i. Psychotherapy notes;
 - ii. Information compiled for use in reasonable anticipation of civil, criminal, or administrative proceedings; **Exception:** In accordance with UCA 62A-15-643, an individual has the right to access all certificates, applications, records, and reports prepared for involuntary commitment proceedings;
 - iii. Information that is subject to or exempt from the federal Clinical Laboratory Improvements Amendments of 1988.
 - iv. Information, which USDC believes, in good faith, may endanger the life or physical safety of the individual or any other person.

Procedures:

- 1. **Requesting access to information.**
 - a. Individuals may request to access, inspect and obtain a copy of protected health information about themselves, subject to certain limitations.

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 5 OF 11

- i. All requests for access will be made by having the individual complete the “Access to Records Request Form.” The form will be received and processed by the privacy officer.
 2. **Timeframes to act on a request for access.**
 - a. USDC must act on an individual’s request for access no later than 30 days after receiving the request.
 - i. In cases where the information is not maintained or accessible onsite, USDC must act on the individual’s request no later than 60 days after receiving the request.
 - ii. If USDC is unable to act within these 30-day or 60-day limits, it may extend this limitation by up to an additional 30 days, subject to the following:
 - A. USDC must notify the individual in writing of the reasons for the delay and the date by which it will act on the request.
 - B. USDC will use only one such 30-day extension to act on a request for access.
 - b. If USDC grants the individual’s request, in whole or in part, it must inform the individual of the access decision and provide the requested access.
 - i. If USDC maintains the same information in more than one format (such as electronically and in a hard-copy file) or at more than one location, it need only provide the requested protected information once.
 - ii. USDC must provide the requested information in a form or format requested by the individual, if readily producible in that form or format. If not readily producible, USDC will provide the information in a readable hard-copy format or such other format as agreed to by USDC and the individual.
 - iii. USDC may provide the individual with a summary of the requested information, in lieu of providing access, or may provide an explanation of the information if access had been provided, if:
 - A. The individual agrees in advance; and
 - B. The individual agrees in advance to any fees USDC may impose.
 - iv. USDC must arrange with the individual for providing the requested access in a time and place convenient for the individual and USDC. This may include mailing the information to the individual if the individual so requests or agrees.
 - v. An individual may request a copy of his or her protected health information or a written summary or explanation. USDC will provide a copy of the requested protected health information without charge to the individual in accordance with R495-810-2, Fee Schedule for Records Copies. USDC may charge a cost-based fee to prepare an explanation or summary of the requested information, if agreed to in advance by the individual.
 3. **Denial of access - Unreviewable grounds for denial**
 - a. An individual **does not** have the right to a review of a decision to deny access in the following circumstances:
 - i. The protected health information was obtained from someone other than a health care provider under a promise of confidentiality, and access would reveal the source of the information; or
 - ii. The protected health information was contained in psychotherapy notes.

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 6 OF 11

- iii. The protected health information was compiled for the use in civil, criminal, or administrative proceedings; or
- iv. The protected health information is subject to the Clinical Laboratory Improvements Amendments of 1988.

4. Denial of access - Reviewable grounds for denial

- a. An individual has the right to a review of a decision to deny access in the following circumstances:
 - i. **Endangerment:** A licensed health care professional at USDC has determined, in the exercise of professional judgment, that the information requested is **reasonably likely to endanger the life or physical safety** of the individual or another person; or
 - ii. **Personal Representative:** The request for access is made by the individual's personal representative, and a licensed health care professional or other designated staff at USDC has determined, in the exercise of professional judgment, that allowing the personal representative to access the information is **reasonably likely to cause substantial harm** to the individual or to another person.
 - iii. **Reference to another Person:** The protected health information makes reference to another person, and a licensed health care professional at USDC has determined, in the exercise of professional judgment, that the information requested is **reasonably likely to cause substantial harm** to that person.
- b. The individual has the right to have the decision to deny reviewed by a licensed health care professional at USDC who was not directly involved in making the original denial decision. USDC will provide or deny access in accordance with this review.
 - i. The reviewer must determine, within a reasonable time, whether to approve or deny the individual's request for access.
 - ii. USDC must then:
 - A. Promptly notify the individual in writing of the reviewer's determination; and
 - B. Take prompt action to carry out the reviewer's determination.
- c. If USDC denies access, in whole or in part, to the requested information, it must:
 - i. Give the individual access to any other requested protected health information of the individual, after excluding the information to which access is denied;
 - ii. Provide the individual with a timely written denial. The denial must:
 - A. State the basis for the denial, in plain language;
 - B. If the reason for the denial is due to danger or harm to the individual or another, explain the individual's review rights as specified in Section 4b, Denial of Access – Reviewable Grounds for Denial of this procedure, above, including an explanation of how the individual may exercise these rights; and
 - C. Provide a description of how the individual may file a complaint with USDC, (including the name or title and telephone number of the contact person) or with the United States Department of Health and Human Services (DHHS) Office of Civil Rights.
- d. If USDC does not maintain the requested protected health information, and knows where such information is maintained (such as by a medical provider, insurer, other public agency, private business, or other non-USDC entity), USDC must inform the individual of where to direct the request for access.

Policy:

5. Rights of individuals to request amendments to their information.

- a. Individuals have the right to request that USDC amend their protected health information in its designated record sets.
- b. USDC is not obligated to agree to an amendment and may deny the request or limit its agreement to amend.

Procedures:

1. Requesting amendments of protected health information.

- a. All requests for amendments will be made by having the individual complete the, "Amendment of Health Record Request Form."
 - i. Supporting documentation for request is limited to four (4) pages.
- b. USDC must act on the individual's request no later than 60 days after receiving the request. If USDC is unable to act on the request within 60 days, it may extend this time limit by up to an additional 30 days, subject to the following:
 - i. USDC must notify the individual in writing of the reasons for the delay and the date by which it will act on the receipt; and
 - ii. USDC will use only one such 30-day extension.
- c. If USDC grants the request, in whole or in part, it must:
 - i. Make the appropriate amendment to the protected health information in the designated record set and document the amendment in the individual's file or other designated record set;
 - ii. Provide timely notice to the individual that the amendment has been accepted, pursuant to the time limitations in Section 1.c. of this procedure, above;
 - iii. Seek the individual's agreement to notify other relevant persons or entities, with whom USDC has shared, or needs to share, the amended information; and
 - iv. Make reasonable efforts to inform, and to provide the amendment within a reasonable time to:
 - A. Persons named by the individual as having received protected information and who thus need the amendment; and
 - B. Persons, including business associates of USDC, who have the protected information that is the subject of the amendment and who may have relied, or could foreseeably rely, on the information to the individual's detriment.
 - v. Prior to any decision to amend protected health information, the request and any related documentation shall be reviewed by the superintendent, medical/clinical director, a licensed health care professional designated by the USDC administrator, or a USDC staff person involved in the individual's case.
- d. USDC may deny the individual's request for amendment if:
 - i. USDC finds the information to be accurate and complete;
 - ii. The information was not created by USDC, unless the individual provides a reasonable basis to believe that the originator of such information is no longer

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 8 OF 11

- available to act on the requested amendment;
- iii. The protected health information is not part of the USDC- designated record set.
- iv. The protected health information is not available for inspection under Section 4 of this policy (Rights of Individuals to Access Protected Health Information).

- e. If USDC denies the requested amendment, in whole or in part, it must provide the individual with a timely written denial. The denial must:
 - i. Be sent or provided within the time limits specified in Section 1.c., of this procedure, above;
 - ii. State the basis for the denial, in plain language;
 - iii. Explain the individual's right to submit a written statement—not exceeding four pages—disagreeing with the denial.
 - A. USDC will enter the written statement into the individual's case file;
 - B. USDC may prepare a written rebuttal of the individual's written statement and enter it into the individual's case file. USDC will send or provide a copy of the written rebuttal to the individual;
 - C. USDC will include a copy the individual's request, USDC's denial, the individual's statement, and USDC's written rebuttal, with any future disclosures of the relevant information;
 - D. Explain that if the individual does not submit a written statement of disagreement, the individual may ask that if USDC makes any future disclosures of the relevant information, USDC will also include a copy of the individual's original request for amendment and a copy of USDC's written denial; and
 - E. Provide information on how the individual may file a complaint with USDC, (including the name or title and telephone number of the contact person) or with the U.S. Department of Health and Human Services (DHHS), Office of Civil Rights.

Policy:

- 6. **Rights of individuals to an accounting of disclosures of protected health information. (45 CFR 164.528)**
 - a. Individuals have the right to receive an accounting of disclosures of protected health information made by USDC.
 - b. The accounting to the individual will only include that protected health information **not** previously authorized by the individual for use or disclosure, and will not include information collected, used or disclosed for treatment, payment or health care operations regarding that individual.

Procedures:

- 1. **Requesting an accounting of disclosures**
 - a. When a individual requests an accounting of disclosures USDC has made of their protected health information (PHI), USDC must provide that individual with a written accounting of such disclosures made during the six-year period (or lesser time period if specified by the requesting individual) preceding the date of the individual's request.
 - b. All requests for an accounting of disclosures will be made by having the individual complete the "Accounting of Disclosures Request Form."
 - c. Examples of disclosures of protected health information (PHI) that are required to be listed in an accounting (unless prohibited by federal law or restricted by the individual)

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 9 OF 11

include:

- i. Abuse Report: PHI provided pursuant to mandatory abuse reporting laws to an entity authorized by law to receive the abuse report.
 - ii. Business Associates: PHI disclosed to or by business associates of USDC.
 - iii. Audit Review: PHI provided in relation to an audit or review (whether financial, quality assurance, or other audit or review) of a provider or contractor.
 - iv. Health and Safety: PHI provided to avert a serious threat to health or safety of a person.
 - v. Licensee/Provider: PHI provided in relation to licensing, regulation, or certification of a provider, licensee, or entity involved in the care or services of the individual.
 - vi. Legal Proceeding: PHI that is ordered to be disclosed pursuant to a legal or administrative proceeding. A copy of the order shall be provided with the accounting.
 - vii. Law Enforcement Official/Court Order: PHI provided to law enforcement official pursuant to a court order. A copy of the court order shall be provided with the accounting.
 - viii. Law Enforcement Official/Deceased: PHI provided to law enforcement officials or medical examiners about a person who has died, for the purpose of identifying the deceased person, determining cause of death, or as otherwise authorized by law.
 - ix. Law Enforcement Official/Warrant: PHI provided to a law enforcement official in relation to a fleeing felon for whom an arrest warrant has been issued, provided, the law enforcement official has made proper request for the information, or as otherwise permitted by law.
 - x. Media: PHI provided to the media (TV, newspaper, etc.) that is not within the scope of an authorization by the individual.
 - xi. Public Health Official: PHI about an individual provided to a public health official, such as the reporting of disease, injury, or the conduct of a public health study or investigation.
 - xii. Research: PHI about an individual provided for purposes of research conducted without authorization in accordance with a waiver of authorization approved by an Institutional Review Board (IRB). USDC shall include a copy of the research protocol with the accounting, along with the other information required under the HIPAA privacy rule, 45 CFR § 164.528(b)(4).
- d. USDC is not required to provide the individual with an accounting of disclosures that are:
- i. Authorized by the individual;
 - ii. Made more than six years prior to the date of the request;
 - iii. Made to carry out treatment, payment, and health care operations;
 - iv. Made to the individual;
 - v. Made to persons involved in the individual's health care;
 - vi. Made as part of a limited data set in accordance with the De-identification of Individual Information and Use of Limited Data Sets policy.
 - vii. Made for national security or intelligence purposes; or
 - viii. Made to correctional institutions or law enforcement officials having lawful custody of an individual-inmate.
- e. The accounting must include, for each disclosure:
- i. The date of the disclosure;
 - ii. The name, and address if known, of the person or entity who received the disclosed

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 10 OF 11

- information;
- iii. A brief description of the information disclosed; and
 - iv. A brief statement of the purpose of the disclosure that reasonably informs the individual of the basis for the disclosure and a copy of any request for disclosure from the Department of Health and Human Services, any request from a public health authority, any court or administrative order, or any request from an authorized government authority.
- f. If USDC has made multiple disclosures to the same person or entity for the same purpose, it need not list the same person or entity if USDC adds the following information to the first disclosure:
- i. The frequency or number of disclosures made during the accounting period; and
 - ii. The last date of the disclosure made during the requested time period.
- g. USDC must act on an individual's request for an accounting no later than 60 days after receiving the request, subject to the following:
- i. If unable to provide the accounting within 60 days after receiving the request, USDC may extend this requirement by another 30 days. USDC must provide the individual with a written statement of the reasons for the delay within the original 60-day limit, and inform the individual of the date by which it will provide the accounting.
 - ii. USDC will use only one such 30-day extension.
- h. USDC must provide the first requested accounting in any 12-month period without charge. USDC may charge the individual a reasonable cost-based fee for each additional accounting requested by the individual within the 12-month period following the first request, provided that USDC:
- i. Informs the individual of the fee before proceeding with any such additional request; and
 - ii. Allows the individual an opportunity to withdraw or modify the request in order to avoid or reduce the fee.
- i. USDC must document, and retain in the individual's case file, the information required to be included in an accounting of disclosures and a copy of the written accounting to the individual.
- j. USDC will temporarily suspend an individual's right to receive an accounting of disclosures that USDC has made to a health oversight agency or to a law enforcement official, for a length of time specified by such agency or official, if:
- i. The agency or official provides a written statement that the accounting would likely impede their activities.
 - ii. However, if such agency or official makes an **oral** request, USDC will:
 - A. Document the oral request, including the identity of the agency or official making the request;
 - B. Temporarily suspend the individual's right to an accounting of disclosures pursuant to the request; and
 - C. Limit the temporary suspension to no longer than 30 days from the date of the oral request, unless the agency or official submits a written request specifying a longer time period.

**UTAH STATE DEVELOPMENTAL CENTER
POLICY AND PROCEDURE MANUAL**

HIPAA PRIVACY RIGHTS OF INDIVIDUALS

PAGE 11 OF 11

Policy:

7. Rights of individuals to file complaints regarding use and disclosure of protected health information.

Individuals have a right to submit a complaint if they believe that USDC has improperly used or disclosed their protected health information, or if they have concerns about the privacy policies of USDC or about its non-compliance with such policies.

Procedure:

1. Filing a Complaint.

- a. Individuals may file complaints with USDC, or with the U.S. Department of Health and Human Services (DHHS) - the Office for Civil Rights.

Privacy Officer
Utah State Developmental Center
895 N. 900 E.
American Fork, Ut 84003
Phone: (801) 763-4028
Fax: (801) 763-4086

Region VIII, Office for Civil Rights
U. S. Department of Health and Human Services
1961 Stout Street, Room 1185 FOB
Denver, CO 80294-3538
Phone: (303) 844-2024
Fax: (303) 844-2025
TDD: (303) 844-3439
Email: OCRComplaint@hhs.gov

- b. USDC will not intimidate, threaten, coerce, discriminate against, or take any other form of retaliatory action against any person filing a complaint or inquiring about how to file a complaint.
- c. USDC may not require individuals to waive their right to file a complaint as a condition of providing treatment, payment, and enrolling in a health plan, or establishing eligibility for benefits.
- d. USDC will document in the individual's case file all complaints, the findings from reviewing each complaint, and all USDC actions resulting from the complaint. The documentation for each specific complaint shall include a description of the corrective actions that were taken or an explanation as to why corrective actions were not needed.

Karen A. Clarke, Superintendent