Governance Committee Meeting

Meeting date: Monday, February 1, 2021

Meeting time: 5:00pm – 6:13pm

Meeting location: https://us02web.zoom.us/j/83937002213

Meeting ID: 839 3700 2213

Passcode: 822653

Dial by phone:1 (929) 205 6099, Meeting ID: 839 3700 2213, Passcode: 822653

Recorder: Ashley Morrow

Committee Members Present:

X	Katie Chieda, Board Chair	X	Ben Chaffee, Jr.
X	Lisa Hivnor, First Vice Chair	X	Mike White
X	Julie Landoll, Second Vice Chair		

Board Staff Present:

X	Kristen Cardone, Executive Director	X	Ashley Morrow, Administrative Assistant

Discussion Items:

- Quarterly Reports (Email Attachment)
 - Ms. Cardone shared the following updates with committee members from agency quarterly reports.
 - Age Exchange had a slow start but they are now seeing people virtually. Age Exchange
 is still doing a very good job at working on creative ways to keep youth and mentors
 engaged.
 - Miriam House has been consistently full. They had a number of people leave in a short period of time due to COVID related issues, however, they were able to fill those vacancies rather quickly.
 - Catholic Charities Adult Advocacy services have taken on quite a few clients over the past few months and as a result there is an increased need for these services. This need will continue to be monitored and may result in an increased need for funding from the Board.
 - Family and Children First Council (FCFC) is expanding rapidly and seeing a significant increased need for services. Ms. Cardone shared that there have been ongoing conversations on how to help meet the needs. A gap identified is the need for additional intensive home based family treatment services that the county doesn't currently have so that will be an ongoing conversation in the future to discuss and develop possible solutions.
 - Firelands Counseling and Recovery Services (FCRS) stated their numbers for clients were down for both mental health and substance use services, however, they have seen an increase in crisis services. FCRS currently has two positions open, referrals are on and off but they have been pretty consistent.

- Family Life Counseling (FLC) has seen a decrease as well in mental health services, however they are seeing an increase in substance use services. FLC has moved their main office to Shady Lane and are utilizing the building on Woodlawn as a behavioral health center for children. FLC shared that men's recovery house in Willard, House of Hope, plans to have renovations completed by April and currently has two open beds which is consistent with their occupancy in the past. However, this report does not reflect the need for recovery housing rather the admissions process which is being worked on. FLC also shared that school-based services are still continuing.
- Oriana House, Inc. shared that they have seen an increase in substance use services, estimated 30% increase in new clients and that their no-show rate has decreased by an estimated 50%. Oriana House is currently offering services in person and virtually. Oriana's Family Matters support group started in January and is being held virtually. Oriana House also shared that the No Bars program has also experienced an increase in clients.
- Huron County Family Dependency Court Program shared that they are down one client but they are still seeing great results.
- Let's Get Real shared they have seen consistent numbers with clients served. LGR is now involved with the Family Dependency Court Program, their peer support training is going well with two potential new peer supporters for Huron County, they are working with local law enforcement and building relationships, and recently an MOU with Mercy Hospital in Willard was completed to implement a warm handoff process. Additionally, they have been approved to be Huron County's first Project Dawn site, they are now serving as the lead for QRT (Quick Response Team), they are offering five support groups a week, and LOSS (Local Outreach to Suicide Survivors) now has three volunteers and is offering a grief support group.
- NAMI Huron County has experienced a few challenges in adjusting however they have been collaborating well with other NAMI groups in the area to assist in helping them expand their services in Huron County. NAMI Huron County is hoping to increase the number of monthly meetings from 1 to 4 in partnership with Erie Ottawa NAMI, they are working on implementing a monthly community game night, and they are partnering with NAMI of Sandusky, Seneca, and Wyandot Counties to do CIT (Crisis Intervention Team) training for law enforcement.
- Drug Free Clubs of America (DFCA) is currently only operating in St. Paul Schools and they have 85 participants. Norwalk Middle School and Norwalk High School opted out of the program for this year due to COVID related concerns.
- Reach Our Youth (ROY) has added four new mentors to their program and continuously working on finding creative ways to keep people engaged.

Policies

- Client Rights Policy
 - Ms. Cardone shared that feedback received the last time committee members reviewed the Client Rights Policy was "Committee members asked if there is a risk if the Board posts this and the agencies didn't meet it." Ms. Cardone shared that the Clients Rights come directly from the Ohio Revised Code (ORC) so agencies are required by law to meet these rights. In addition, Ms. Cardone referred to other Boards and this is a policy many of them also have.
 - Ms. Chieda stated the policy makes complete sense with the corrected verbiage. There were no other comments or questions on this policy. This policy will be added to the Board meeting agenda for approval.
- Board Attendance Policy
 - Ms. Cardone shared that this policy was created a few months ago and asked committee members to review it.

- No concerns or comments regarding this policy and it will be added to the Board meeting agenda for approval.
- o Public Records Policy
 - Ms. Cardone shared that this policy was put on hold for further review. Ms. Hivnor proposed some changes to the policy and those updates have been made.
 - No concerns or comments regarding this policy and it will be added to the Board meeting agenda for approval.
- Cyber Security Policy (Email Attachment)
 - Ms. Cardone stated this is a policy was adopted by the Huron County Commissioners last week and they have recommended that organizations who do not have a cyber security policy to adopt this one. Ms. Cardone stated she did not see anything concerning and asked committee members to review it. However, Ms. Cardone added she does need additional clarity on the policy and would like some changes to be made to make it more applicable to the Board before it will be added to the agenda for approval.

• FY 2022 Proposals

- o February 2021
 - Ms. Cardone shared that in February the Board is required to send out 120 Day notices by law. She informed committee members that the wording is very vague so there may be changes that may be necessary in the future but have not taken place yet. Ms. Cardone informed committee members that the 120 Day letter will be going out to all agencies by the end of the month.
- o Form for new agencies (Email Attachment)
 - Ms. Cardone shared that the Requests For Proposals (RFP) will also be going out in February for FY22. Ms. Cardone shared that the original RFP was very vague and was updated to include more applicable questions. However, Ms. Cardone shared that for current agencies the Board contracts with the RFP is very redundant. For this reason, Ms. Cardone created a proposed RFP for the current agencies. Some sections of the RFP current contracted agencies are required to complete, however, some of the more repetitive information that the Board is already aware of from the previous working relationship is not necessary to provide anymore. Ms. Cardone stated she cut out the unnecessary sections for agencies unless there are changes to the current services or new services being proposed. Ms. Cardone shared that this proposed document will go to agencies the Board currently contracts with and the RFP will go to any new agencies looking for funding.
 - Committee members were in support of this change.

• Levy Reserves

- Ms. Cardone shared that every year the levy reserves need to be reviewed as to how much the Board has and to review how the Board spends those funds. Ms. Cardone shared that the Board currently contracts for an estimated \$500,000.00 in Levy Reserve funds annually over and above what the Board is currently bringing in. The Board is still in good standing financially, however, there will need to be discussions in the future on how to best utilize Levy Funds on projects that can in time become self-sustainable with other sources of funding as the Levy Reserves are not able to be used for programs and services requiring sustainability due to the Board's current usage of these funds.
- o This topic will be added to the Finance Committee meeting agenda.
- Strategic Plan Review (Email Attachment)
 - o Ms. Cardone shared some updates on the Board's Strategic Plan. Ms. Cardone shared that outreach and engagement has expanded and it has been very successful, however, there is still a lot of work to do. Ms. Cardone added that there are more creative ways to do outreach and engagement but that comes with the assistance of collaboration and partnership with other organizations and community partners. Outreach and engagement will be a continued focus into

the next year. Ms. Cardone added that the schools was another area in need of increased support and Board staff have continued to focus on how to support schools without adding an additional burden on them. Ms. Cardone also shared that recovery housing is a consistent need that the Board will need to look at in the upcoming fiscal year, adding that conversations around project sustainability are going to be important.

No questions or concerns regarding the strategic plan updates.

• FY 2022 Planning

- Capital Funds
 - Ms. Cardone shared that Capital Funds have now been released and she has resubmitted the Board's previous applications with a few updates. Ms. Cardone shared that she removed the application for the community center now that Let's Get Real is up and running in the lower level of the Board office. The recovery housing project is the only project being considered for Huron County. Ms. Cardone stated it will be important to prioritize projects that are able to sustain themselves especially with the new knowledge of how much the Board is spending in Levy Reserves each year. Ms. Cardone shared that since the Board has never received capital funds, it is likely the Board should be one of the first applications to be reviewed.
 - Recovery Housing (\$200,000)
 - Ms. Cardone resubmitted the Board's application for capital funds for recovery housing and the Board will be required to provide a 50% match of up to \$200,000.00.
 - Youth Resiliency (\$125,000)
 - Ms. Cardone shared that the state recently released an additional pot of funds for both capital youth resiliency projects. Youth resiliency projects can include mentoring centers, youth behavioral health, and other projects that build resiliency. Ms. Cardone shared that this funding could be used to implement the Boys and Girls club or something similar in Huron County which was a project previously discussed. This project could possibly operate under Family and Children First Council. The Board can apply for up to \$500,000.00 and the board will then provide a 25% match. Ms. Cardone shared that this project could possibly start it in Norwalk and expand throughout the county as this was the plan discussed previously.
 - Mr. Ben Chaffee, Jr. asked if the project had to start in Norwalk or if it could it start in Willard or another southern part of the county.
 - Ms. Cardone shared that from previous conversations related to the Boys and Girls Club, they intended to start it at the Perkins family gym which drove the decision for a Norwalk location because the building had already been decided on and estimates for renovations have already been completed. However, Ms. Cardone stated that with \$500,000.00 renovations could be done with any building in the county.
 - Ms. Cardone added that this topic will be discussed further in committee meetings and added to the agenda for the Board meeting.
 - Jail (up to \$250,000)
 - Ms. Cardone shared that she has had multiple conversations with Sheriff Corbin about the growing behavioral health needs of individuals in the Huron County jail. It is estimated that 80-90% of individuals in the jail present with a behavioral health issue. Ms. Cardone shared that she would like to have a discussion in the future about possibly applying for capital funds from the state to assist the jail in building a behavioral health wing for inmates who are not being transferred to the

state hospital or other location for behavioral health treatment. Ms. Cardone added that there is a great benefit to isolating inmates who are presenting mental health symptoms from the general population so that they can get the treatment they need. Ms. Cardone added that other jails throughout the state have something similar and they have proven to be successful, adding that it would be the perfect opportunity to meet inmates where they are at and get them the help they need.

• This will be an ongoing conversation in the future.

New Board Members

- o Mentors
 - Ms. Cardone shared that mentors are needed for the two new Board members.
 - Ms. Lisa Hivnor offered to be a mentor and Mr. Ben Chaffee, Jr. recommended Ms. Dorothy Ruffer.
- Committee placement
 - Ms. Cardone shared that there is one opening on the Program Committee and an opening on the Finance Committee however both new Board members cannot be on the same committee. After discussion committee members recommended Ms. Laura Wheeler for the Finance Committee and Ms. Amber Boldman for the Program Committee, dependent upon their schedules.

Attachment I – Client Rights Policy

Client's Rights and Grievance Policy and Procedure

Current

504.9 SECTION 9:

CLIENT'S RIGHTS AND GRIEVANCE PROCEDURE

Section 5119.36 (1)(K) (i-iv), Revised Code, mandates that the Director of OhioMHAS adopt rules requiring all public or private agencies providing services or facilities under contract with MHAS Boards to have written policies addressing the rights of clients. Such written policies shall be submitted by contract providers or prospective contract providers to the Huron County Board of MHAS which will submit them to OhioMHAS for approval.

The rights of persons receiving behavioral health treatment services shall be contained in written policies of contract providers that include:

- 1. The right to a copy of the written policies addressing client rights;
- 2. The right at all times to be treated with consideration and respect for privacy and dignity;
- 3. The right to have access to one's own psychiatric, medical or other treatment records unless access is specifically restricted in the treatment plan for clear treatment reasons; and
- 4. The right to have a client rights officer, provided by the provider agency/organization or the Board of Mental Health and Addiction Services, to advise the individual of his/her rights, including the rights stipulated under <u>Chapter 5122</u> of the Revised Code for clients committed to the provider or board.

Grievances are to be addressed as stated in the Board's state department-approved policies/procedures included in the $\underline{500}$ APPENDIX of the policies.

New

Policy: It is the policy of the Board to ensure that client rights will be protected through the development of a Client Rights procedure that provides for an impartial resolution of grievances. It is the policy of the Board to assure that all staff members are informed of and are familiar with this client grievance policy. Each staff member shall sign an acknowledgement statement documenting that they have been oriented to these policies and procedures and have received such policies and procedures in written form. The signed acknowledgement shall become part of the staff person's personnel file. Each staff member shall be able to explain any and all aspects of the Client Rights and Grievance Procedure to a client or a parent/guardian, upon request.

According to the Ohio Revised Code rule 5122-26-18, except for clients receiving forensic evaluation service as defined in rule 5122-29-07 of the Administrative Code from a certified forensic center, or attending a driver intervention program as defined in rule 5122-29-12 of the Administrative Code, each client has all of the following rights:

- (1) The right to be treated with consideration and respect for personal dignity, autonomy and privacy;
- (2) The right to reasonable protection from physical, sexual or emotional abuse, neglect, and inhumane treatment;
- (3) The right to receive services in the least restrictive, feasible environment;
- (4) The right to participate in any appropriate and available service that is consistent with an individual service plan (ISP), regardless of the refusal of any other service, unless that service is a necessity for clear treatment reasons and requires the person's participation;
- (5) The right to give informed consent to or to refuse any service, treatment or therapy, including medication absent an emergency;
- (6) The right to participate in the development, review and revision of one's own individualized treatment plan and receive a copy of it;
- (7) The right to freedom from unnecessary or excessive medication, and to be free from restraint or seclusion unless there is immediate risk of physical harm to self or others;
- (8) The right to be informed and the right to refuse any unusual or hazardous treatment procedures;
- (9) The right to be advised and the right to refuse observation by others and by techniques such as one-way vision mirrors, tape recorders, video recorders, television, movies, photographs or other audio and visual technology. This right does not prohibit an agency from using closed-circuit monitoring to observe seclusion rooms or common areas, which does not include bathrooms or sleeping areas;
- (10) The right to confidentiality of communications and personal identifying information within the limitations and requirements for disclosure of client information under state and federal laws and regulations;
- (11) The right to have access to one's own client record unless access to certain information is restricted for clear treatment reasons. If access is restricted, the treatment plan shall include the reason for the restriction, a goal to remove the restriction, and the treatment being offered to remove the restriction;
- (12) The right to be informed a reasonable amount of time in advance of the reason for terminating participation in a service, and to be provided a referral, unless the service is unavailable or not necessary;
- (13) The right to be informed of the reason for denial of a service;
- (14) The right not to be discriminated against for receiving services on the basis of race, ethnicity, age, color, religion, gender, national origin, sexual orientation, physical or mental handicap, developmental disability, genetic information, human immunodeficiency virus status, or in any manner prohibited by local, state or federal laws;
- (15) The right to know the cost of services;
- (16) The right to be verbally informed of all client rights, and to receive a written copy upon request;
- (17) The right to exercise one's own rights without reprisal, except that no right extends so far as to supersede health and safety considerations;
- (18) The right to file a grievance;

- (19) The right to have oral and written instructions concerning the procedure for filing a grievance, and to assistance in filing a grievance if requested;
- (20) The right to be informed of one's own condition; and,
- (21) The right to consult with an independent treatment specialist or legal counsel at one's own expense.

Procedure:

- 1. Each contract agency of the Board is required to establish a client rights policy, which meets the requirements of Administrative Rule 5122-26-18.
- 2. A copy of the policy is to be posted in a conspicuous location at each agency, and a copy of such policy is to be filed at the Board office. A copy of such policy will be made available to the community upon request.
- 3. A copy of the Client Rights Policy shall be distributed to each client or parent/guardian at the intake session or next subsequent appointment.
- 4. Each employee of a contract agency shall receive a copy of the Client Rights Policy and shall be able to explain any and all aspects of the Client Rights and Grievance Procedure to a client or parent/guardian, upon request.
- 5. In case of a crisis or emergency situation, the client or parent/guardian shall be verbally advised of at least the immediate pertinent rights including, but not limited to, the right to consent to or to refuse the offered treatment and the consequences of that agreement or refusal. A printed copy and full verbal explanation of the Client Rights Policy may be delayed until the next appropriate meeting.
- 6. Each contract agency of the Board shall ensure that a client or recipient of behavioral health services may receive a copy and explanation of the Client Rights Policy upon request.

Each contract agency of the Board is required to notify the Executive Director in writing within 24 hours of any verbal or written complaint alleging client right violation. The notification will include the action taken to resolve the complaint. The resolution of the grievance shall not exceed twenty (20) working days from the date of filing the grievance, unless a specific timeline is agreed to by all parties.

Should no satisfactory resolution of the grievance be reached at the agency level, the client or his/her representative may initiate a written complaint with the Client Rights officer designated by the Board following notification of the results of the agency. Provisions for redress shall be made available to assist clients who cannot write or may have difficulty filing an appeal.

The Executive Director shall serve as the Board Client Rights Officer.

Executive Director

Huron County Board of Mental Health and Addiction Services 2 Oak Street Norwalk, Ohio 44857

Phone: 419-681-6268

Grievances are to be addressed as stated in the <u>500 APPENDIX</u> of the policies.

Attachment II – Board Attendance Policy

HURON COUNTY BOARD OF MENTAL HEALTH & ADDICTION SERVICES

Meeting attendance expectations Date of board adoption?

All members of the Huron County Board of Mental Health & Addiction Services (MHAS) should take membership seriously and make reasonable attempts to attend all committee, regular and special board meetings. Failure to do so jeopardizes the work and mission of MHAS and the services it provides to residents of Huron County. The following protocol is established and adopted by MHAS in order to provide clarity of meeting attendance expectations, in accordance with this section of Ohio Revised Code:

Ohio Revised Code 340.02 (G) (in part)

"...Any member of the board may be removed from office by the appointing authority for neglect of duty, misconduct, or malfeasance in office, and shall be removed by the appointing authority if the member is barred by this section from serving as a board member. The member shall be informed in writing of the charges and afforded an opportunity for a hearing. Upon the absence of a member within one year from either four board meetings or from two board meetings without prior notice, the board shall notify the appointing authority, which may vacate the appointment and appoint another person to complete the member's term...."

<u>Neglect of duty</u> in office is the absence of a Board member within one year from either four Board meetings or from two Board meetings without prior notice. If that occurs, the Board is to notify the Appointing Authority of the offending Board member, which may vacate the appointment and appoint another person to complete that member's term.

<u>Misconduct</u> in office is the commission of conduct not befitting a public official such as neglect of duty, gross immorality, drunkenness, misfeasance, malfeasance or nonfeasance.

<u>Malfeasance</u> in office is the commission of an unlawful act, done in an official capacity, which affects the performance of official duties, such as a Board member acting unilaterally without full Board authorization in any Board matter.

Conflicts of interest in office are defined in Section 103.2 Section 2 of these Policies and Procedures.

MHAS Board members are considered to have an <u>excused</u> absence if they have notified the Executive Director or designee at least one (1) business day prior to a committee, regularly scheduled board meeting or special board meeting. Failure to do so will cause the Board member to be considered <u>unexcused</u>.

In order to be compliant with the law, MHAS Board members will have no more than two (2) consecutive <u>excused</u> absences in one fiscal year or no more than four (4) cumulative <u>excused</u> absences in one fiscal year.

In order to be compliant with the law, MHAS Board members will have no more than a culmination of four (4) <u>unexcused</u> absences in one fiscal year, or no more than a combination of five (5) <u>excused</u> and <u>unexcused</u> absences in one fiscal year.

A letter indicating *potential non-compliance* of ORC 340.02, and steps to be taken in order to maintain MHAS Board membership, will be emailed to the MHAS Board member by the MHAS Executive Director no later than one (1) business week after the MHAS Board member has reached any of the following:

- Two (2) consecutive *excused* absences, and/or
- Three (3) cumulative excused absences, and/or
- Three (3) cumulative *unexcused* absences, and/or
- Three (3) cumulative/combined <u>excused</u> and <u>unexcused</u> absences.

The MHAS Board member receiving this letter will be expected to contact the MHAS Executive Director within one (1) business week to acknowledge receipt of the letter and provide a plan of action to remedy his or her attendance. The Executive Director may accept the plan of action, or may share the plan of action with the MHAS Board for consideration.

Any MHAS Board member who would receive this letter twice or more in one fiscal year will automatically be recommended for membership termination at the next regularly scheduled MHAS board meeting, in accordance with ORC 340.02.

Attachment III – Public Records Policy

Availability of Public Records Policy

Current

409.4 SECTION 4:

AVAILABILITY OF PUBLIC RECORDS

It is the policy of the Board that openness leads to a better informed citizenry, which leads to better government and better public policy. It is the policy of this office to strictly adhere to the state's Public Records Act.

<u>Section 149.43</u> of the ORC provides that all public records shall be open, at reasonable times, for inspection. All public records shall be prepared and made available within a reasonable period of time for inspection to any person during regular business hours. Upon request, a person responsible for public records shall make copies available at cost, within a reasonable period of time.

"Reasonable" takes into account the volume of records requested; the proximity of the location where the records are stored; and the necessity for any legal review of the records requested. In order to enhance the ability to identify requested records, the Board may ask for the request in writing, although the requestor shall be advised that a request in writing is not mandatory.

Public notice shall be displayed in the Board office with its policy regarding availability of public records and the cost of those records if paper copies are requested or required.

New

I. POLICY

It is the policy of the Board to maintain public records as defined by Revised Code, Sections 149.011 and 149.43 in such a manner as required by State and Federal law. The Board will make available to any member of the general public all public records except those determined to be exempt under, R.C. 149.43 and 149.433 pursuant to State and Federal law.

II. DEFINITIONS

A "record" is defined to include the following: a document in any format – paper, electronic (including but not limited to, business e-mail) – that is created, received by, or comes under the jurisdiction of the Huron County Board of Mental Health and Addiction Services that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the Huron County Board of Mental Health and Addiction Services (MHAS).

A "public record" is a "record" that is being kept by this office at the time a public records request is made, subject to applicable exceptions from disclosure under Ohio or federal law. All public records must be organized and maintained in such a way that they can be made available for inspection and copying.

III. PROCEDURE

- 1. Public records, as defined by Revised Code Sections 149.011 and 149.43 but subject to exemptions under R.C. 149.43 and 149.433, are to be available for inspection during regular business hours. Public records must be made available for inspection promptly.
- 2. Requests to review public records are made to the Executive Director or shall be forwarded to the Executive Director by other Board staff.

- 3. Copies of public records must be made available within a reasonable period of time. "Prompt" and "reasonable" take into account the volume of records requested; the proximity of the location where the records are stored; the necessity of any legal review and redaction; and other facts and circumstances of the records requested.
- 4. Generally, all requests for public records should be acknowledged in writing or, if feasible, satisfied within ten business days following the office's receipt of the request.
- 5. Those seeking public records may be charged only the actual cost of making copies, not labor. The charge for paper copies is ten (10) cents per page, to be paid by either cash, money order, or cashier's check. For information to be mailed, MHAS will charge at the current postage rate set by the United States Postal Service for all costs incurred, i.e., certified-return receipt requested, certificate of mailing, etc., if deemed necessary or requested. Payment must be paid prior to the release of public records. Checks are to be made payable to Huron County Board of Mental Health and Addiction Services. If electronic documents are requested, the requester must provide MHAS with a new, unopened flash drive and there is no charge for electronic documents provided in this manner, except for postage if the flash drive is to mailed back to the requester. There is no charge for e-mailed documents.
- 6. The requester does not need to identify him/herself or to explain the intended use of any requested public document. MHAS cannot deny access due to a requester's refusal to answer these questions.
- 7. No specific language is required to make a request for public records. However, the requester must at least identify the records requested with sufficient clarity to allow MHAS to identify, retrieve, and review the records. In processing the request, MHAS does not have an obligation to create new records or perform a search or research for information in MHAS's records.
- 8. An electronic record is deemed to exist so long as a computer is already programmed to produce the record through MHAS's standard use of sorting, filtering, or querying features.
- 9. Records in the form of e-mail, text messaging, and instant messaging, including those sent and received via a hand-held communication device, are to be treated in the same fashion as records in other formats, such as paper or audiotape.
- 10. If the requester makes an ambiguous or overly broad request or has difficulty in making a request such that MHAS cannot reasonably identify what public records are being requested, the request may be denied, but MHAS must then provide the requester an opportunity to revise the request by informing the requester of the manner in which records are maintained and accessed by MHAS.
- 11. If MHAS withholds, redacts a portion of, or otherwise denies requested records, it must provide an explanation, including legal authority, for the denial(s). If the initial request was made in writing, the explanation must also be in writing. If some portions of a record are public and other portions are exempt, the exempt portions may be redacted and the rest must be released. When making public records available for public inspection or copying, MHAS shall notify the requester of the reason for any redaction or make the redaction plainly visible.
- 12. The public office shall distribute the public records policy adopted by the public office under this division to the employee of the public office who is the records custodian or records manager or otherwise has custody of the records of that office. The public office shall require that employee to acknowledge receipt of the copy of the public records policy.
- 13. The public office shall create a poster that describes its public records policy and shall post the poster in a conspicuous place in the public office and in all locations where the public office has branch offices.
- 14. The public office may post its public records policy on the internet web site of the public office if the public office maintains an internet web site.
- 15. A public office that has established a manual or handbook of its general policies and procedures for all employees of the public office shall include the public records policy of the public office in the manual or handbook.