

	Compliance	Departments Affected: All Departments/District-Wide
		Effective Date: 02/19/2020
		Revision Date(s): 04/01/2026

LANE TRANSIT DISTRICT Records and Information Management Policy

PURPOSE

The purpose of this policy is to provide guidance for the systematic control of how District records are created, maintained, used, and disposed of, in addition to clarifying employees' responsibilities. It also ensures that records are kept for as long as legally and operationally required, and that obsolete records are properly disposed. This policy also establishes clear expectations for the District's public records requests.

APPLICABILITY

This policy applies to all District employees and vendors acting on behalf of the District, and to all aspects of the District's business in which public records are prepared, owned, used, or retained, regardless of physical form or characteristics. This encompasses information on District property, or off-site, and in any medium. The policy also covers all business applications used to create, manage, or store information, including the official records management systems, email, websites, social media applications, databases, and business information systems.

RESPONSIBILITIES

Records Officer: The District has appointed the Records Management Officer as the Records Officer, per Oregon Administrative Rules (OAR) 166-030-0016. The Records Management Officer is responsible for overseeing the Records Management Program that ensures the orderly retention and disposition of all public records, the preservation of public records of value, provides training and advice to District employees, and serves as the agency's primary liaison with the State, in accordance with the applicable OARs. The Records Management Officer is also responsible for facilitating public records requests under the Oregon Public Records Law (Oregon Revised Statutes (ORS) 192).

Chiefs and Directors: The Chiefs and Directors are ultimately responsible for the management of records and information within their departments. The Chiefs and Directors promote compliance with this policy, delegate responsibility for the operational planning and activity of records and information management, and policy enforcement. The Chiefs and Directors are also responsible for assigning a Manager or Supervisor to provide the information from the records requests.

Managers and Supervisors: Managers and supervisors are responsible for ensuring their direct reports are aware of and supported to follow the records and information management practices defined in this policy. They advise the Records Management Officer of any barriers to employee policy compliance. They should also advise the Records Management Officer of any changes in the business environment that would impact records and information management requirements, such as new areas of business that need to be covered by a records authority. Managers and supervisors are responsible for providing requested records to the Records Management Officer.

Employees: All employees of the District are responsible for records and information management outlined in this policy.

POLICY

ARTICLE 1 PUBLIC RECORDS

The term “Public Record” and “Record” is used synonymously in this document.

Public Records Defined: The definition of public records is established in ORS 192.005(5) and in general means any information that is: prepared, owned, used, or retained by the District; relates to an activity, transaction, or function of the District; and, is necessary to satisfy the fiscal, legal, administrative or historical policies, requirements, or needs of the District.

The following applies to the definition of a public record: a public record may exist in any format, including paper or electronic form, such as email, photographs, maps, and audio or video recordings. Extra copies of a record are not public records (also referred to as a “nonrecord”).

Telephone voicemail messages are public records when considering records requests and a nonrecord for retention. This means that the District is not required to retain voicemail messages; however, if a public records request, legal hold, audit, or other request in which records are needed as evidence for a voicemail message is received while the message is still available, the voicemail shall be retained until the records request is completed.

Public records do not include advertising material received by the District, general announcements issued by other agencies, or other materials that are fleeting in nature and do not involve an activity carried out by the District (also referred to as a “nonrecord”).

Drafts, preliminary or incomplete working drafts, are public records. Text messages and instant messages may also be public records. Social media posts are considered public records if they are made on an official District account, or on a private account that is being used to distribute information for the District to the public. Not included are private accounts of employees that are not used as part of their job. If a private account is used to conduct District business then it becomes public record and is subject to the Oregon Public Records Law. Therefore, the District prohibits the use of private accounts for official business. Posts are subject to retention requirements if the content being posted is unique. The District does not need to preserve redundant content in all forms. For example, if the same event announcement is released via a press release and a social media post, only one copy must be kept. However, if the content of

the two versions differ significantly, then they should be considered unique records and both be retained.

ARTICLE 2 RECORDS MANAGEMENT

Integrity of Records: The District ensures that appropriate access and version controls are applied to all electronically stored records within the District's electronic records management system, Oregon Records Management Solution (ORMS). The authenticity of each record may be demonstrated either by a certified copy of paper records or by accompanying metadata for electronic records.

Records Disaster Preparedness and Recovery: The District's Records Management Program provides disaster preparedness and recovery processes for permanent paper records. The electronic records management system, ORMS, also has a disaster recovery plan in place for the District's electronic long-term and permanent records.

Retention of Records: The District preserves, classifies, and disposes of its public records in accordance with OAR Chapter 166, Division 150, without regard to the technology or medium used to create or communicate the record. Retention assignments are always based on content; therefore, electronic records, film, or any other medium, have the same requirements as paper. The State Archives Division reviews record retention schedules every five years and revises them as needed; therefore, the District will update any records procedures as required.

Unless otherwise stated, a retention period shall be calculated from the date the public record was created.

If a record has more than one retention period applicable, such as other OARs, or Federal authority (the Federal Motor Carrier Safety Administration (FMCSA) or Federal Transit Administration (FTA) grant), the retention shall be based on the longer retention so that records are not destroyed prematurely.

Electronic records are particularly susceptible to accidental deletion, damage, and obsolescence. The District ensures that public records that are maintained in electronic format are accessible for their scheduled retention period in accordance with the general requirements of OAR 166-017-0015. This also includes the District monitoring the compliance of rules and ensuring vendors in contractual agreements with the District adhere to state and District policies.

All electronic records must be saved to the District's network and are not to be kept in email or personal electronic storage. The District prohibits employees from using personal email accounts for official business.

Disposition of Records: Disposition refers to the final retention action carried out on a record, which may include destruction, deletion, secure destruction, or transfer for archival review and storage.

Disposition of records shall occur on a systematic and routine basis, regardless of format. No disposition action shall take place without the assurance that the record is no longer required and

that no litigation, investigation, public records request, audit, or other matter that would involve relying on the record as evidence is present, thus meeting the considerations of OARs 166-030-0041 and 166-030-0045.

Paper Records Storage and Retrieval: Records that have a long-term or permanent retention must be transferred to on-site storage. Records that are historically significant to the District's institutional memory shall be transferred to the onsite records storage. The District meets or exceeds the OAR which sets storage area standards for public records compliance, including security, a fire-resistant structure, temperature and humidity control, adequate lighting and ventilation, protection from insects and mold, proper shelving, and other controls to ensure the optimum longevity of the paper, film, or other medium on which they are recorded. (Reference OAR 166-020-0015)

Digitization of paper records shall be done in accordance with OAR 166-017-0035, which governs the dots per inch (DPI) of scans and quality control of the District's scanners. Digitized documents must be verified for accuracy and completeness after digitization and prior to the destruction of the paper or microfilm original.

Paper Records Destruction: The District shall maintain a log of all paper records destroyed on the authority of the approved records retention schedules. Records that are confidential by law have specific destruction requirements. Records that are not confidential may be recycled. (Reference OARs 166-030-0027(7), and 166-030-0060(2) and (3))

Electronic Records Storage and Retrieval: As the District adopts new electronic technologies, special attention must be paid to ensure that records management requirements and principles are incorporated within those systems.

Electronic records with a scheduled retention period of 100 years or more must be stored as an approved format within the District's electronic records management system that meets specific preservation requirements set forth by the Secretary of State Archives Division's "Electronic Recordkeeping System Requirements." The District utilizes a compliant system, ORMS. (Reference OAR 166-017-0045)

Electronic Records Destruction: The District's electronic records that are destroyed or deleted must be done in accordance with the requirements set for by OAR 166-017-0090. Electronic records that are deleted from the electronic records management system (ORMS) must be documented by a destruction report and is governed within the OARs.

ARTICLE 3 PUBLIC RECORDS REQUESTS

Under ORS 192.314, every person has a right to inspect any non-exempt public record of a public body in Oregon. The District is a public body subject to the requirements of the Oregon Public Records Law.

Requests for Information: The District recognizes the benefit of sharing information with other public bodies, however a public body may not use the Public Records Law to obtain public records. Therefore, information sharing is permitted with other agencies free of charge, as long

as it is not exempt from disclosure under the ORS.

Making a Public Records Request: A request for records that are in the custody of the District shall be made by submitting a written request through the portal located on the District's website. Requestors that do not have online access may complete the District's Public Records Request Form (Exhibit 1), or contact the District's Records Management Officer for special arrangements.

Inspecting Records at the District: To inspect records at the District, the requestor must complete the Public Records Request Form. Once the District has reviewed the request, the requestor shall be contacted when the records are ready for inspection in a space at the District. Pictures of non-exempt records are permitted. There is an hourly charge for employee time to supervise the requestor's inspection of records. This fee must be paid in advance.

The District's Response to Public Records Request:

Acknowledgment of Request. Pursuant to the public records law, within five (5) business days after a written request for public records request has been submitted, the District shall acknowledge receipt of the request, confirm custodianship to the extent possible, or complete the request.

District employees notified of a request must comply with this time frame when communicating custodianship with the Records Management Officer, including the estimated time to gather responsive records.

Time to Fulfill. The District must complete its response to the request as soon as practicable and without unreasonable delay, or within the timeframe of 15 days from submission. If this time is exceeded, the District must provide a written statement that sets forth a reasonable estimated date by which the District expects to complete its response. District employees must comply with this timeframe.

The time periods set forth herein do not apply to the District if compliance would be impracticable because the staff necessary to complete a response are unavailable, compliance would impede the District's ability to perform other necessary services, or the volume of public records requests being simultaneously processed by the District.

A public records request is complete when the District has complied with ORS 192.329.

Non-Responsive Requestor. Pursuant to ORS 192.329(4)(b), if the requestor fails to respond within 60 days to a good faith request from the District for information or clarification, the District shall close the request.

Disclosure Exemptions. In accordance with ORS 192.345 and 192.355, some records are conditionally exempt, and others exempt from disclosure. Per ORS 192.338, if any public record contains material which is nonexempt, as well as material which is exempt from disclosure, the District shall separate the exempt and nonexempt material and make the nonexempt material available for examination.

Fee Schedule for Public Records Requests:

Calculation of Fees. The District charges fees to recoup the cost of making public records available, as allowed by ORS 192.324(4). The Public Records Request Fee Schedule is "Exhibit 2." The fee schedule is updated at the beginning of every fiscal year, July 1.

The District shall waive 30 minutes of employee time for all public records requests. There is an hourly rate for requests that take over 30 minutes, which will be calculated at the fully burdened hourly rate of the affected personnel.

Fees are charged for employee time required to locate, retrieve, compile, review, and redact exempt information from the requested public records before release. Additionally, there are fees for the materials used.

The District requires pre-payment of one-half (50%) of the estimated fee before taking further action on the request. Payment of the remaining fee is required before LTD provides the requested record(s). If the actual charges are less than the prepayment, any overpayment is refunded in a timely manner. If the charges exceed the estimated cost, work will be put on hold until the requestor reviews and decides whether to proceed.

Attorney Fees. The District may charge for attorney fees for the cost of time spent by an attorney in reviewing the public records, redacting material from the public records, or segregating the public records into exempt and nonexempt records.

ADA Format. No additional fees are to be charged for providing a record in an alternate format in accordance with the Americans with Disabilities Act (ADA).

Fee Waivers or Reductions:

Pursuant to ORS 192.324(5), the District may reduce or waive fees if it determines that doing so is in the public interest because making the record available primarily benefits the general public. Release of public records is "in the public interest" when it affects the community or society as a whole, in contrast to a concern or interest of a private individual or entity.

The Fee Reduction Waiver Request Form is "Exhibit 3" and must be completed by the requestor seeking consideration. The Public Interest Threshold Evaluation Form (fee waiver/reduction request evaluation) is "Exhibit 4" and is used by the District as a tool to decide if public interest is applicable.

The decision to waive or reduce fees is within the discretion of the Records Management Officer. Requests for a fee waiver or reduction must be evaluated on a case-by-case basis by the Records Management Officer, based on the following factors:

- Financial hardship on the District;
- The extent of time and expense and interference with the business of the District;
- The volume of the records requested;
- The necessity to segregate exempt from nonexempt materials; and,

- The extent to which an inspection of the records is insufficient for the public interest or for the particular needs of the requestor.

Review of Denials of Public Records Disclosure:

Review of Denial. Within five (5) business days of the District's issuance of a denial or partial denial of the requestor's public records request, the requestor may petition for a review of that decision. The petition must clearly identify the reasons the requestor disagrees with the District's denial. The Records Management Officer shall provide the petition and any other relevant information to the Chief Executive Officer (CEO), or his/her/their designee. Then, within (10) ten business days, the CEO, or designee, considers the petition and either affirms or reverses the denial. The Public Records Request Denial Petition Form is "Exhibit 5."

Appeal. If a public records request is denied, the person making the request may appeal the denial to the Lane County District Attorney's Office. If the Lane County District Attorney determines that disclosure is appropriate, the District shall disclose the records or challenge the District Attorney's decision in court.

DEFINITIONS

ADA: The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against people with disabilities in many areas of public life. The ADA was passed in 1990.

FMCSA: The Federal Motor Carrier Safety Administration is a federal agency that regulates and oversees commercial motor vehicles to reduce crashes, injuries, and fatalities. The FMCSA was established in 2000 as a separate administration within the U.S. Department of Transportation (DOT).

FTA: Federal Transit Administration (FTA) is a US Department of Transportation agency (DOT) that provides financial and technical assistance to local public transit systems, including buses, subways, light rail, commuter rail, trolleys and ferries. FTA also oversees safety measures and helps develop next-generation technology research.

LTD: Lane Transit District, referred to as "the District" in this policy, is a public transit agency and the subject of this policy.

OAR: Oregon Administrative Rules (OAR) are the Administrative Rules and official compilation of rules and regulations, having the force of law in the U.S. state of Oregon.

ORMS: Oregon Records Management Solution (ORMS) is an electronic records management software system that meets reliability and authenticity standards, and applies retention requirements, security settings, access controls, structured context and enterprise-wide searchability to appropriate records and e-mails within it. This is administered through the State of Oregon Secretary of State Archivist's office (SOS).

ORS: Oregon Revised Statutes (ORS) are the codified laws of the state of Oregon. The Oregon Public Records Law is an ORS. The ORS is published every two years. Each edition incorporates all laws, and changes to laws, enacted by the Legislative Assembly through the odd-numbered year regular session referenced in the volume titles for that edition.

Public Records Law, Oregon: Under Oregon's Public Records Law (ORS 192), "every person" has a right to inspect any nonexempt public record of a public body in Oregon. This right extends to any natural person, any corporation, partnership, firm or association, and any member or committee of the Legislative Assembly.

SOS, OR SOS: The Secretary of State (SOS) in this document refers to the Secretary of State's office of the state of Oregon. The secretary of state is one of three constitutional offices established at statehood and is the auditor of public accounts, chief elections officer, public records administrator, and custodian of the State Seal. The State Archives and State Archivist is also part of the SOS office.

COMPLIANCE AND DISCIPLINARY ACTIONS

Employees are expected to comply with all aspects of this policy. Non-compliance may result in disciplinary actions, including warnings, suspension, or termination based on severity.

Failure of the District to comply with this policy may result in legal liabilities, fines, and penalties. Under ORS 162.305, it is a crime to knowingly destroy, conceal, remove, or falsely alter a public record. Tampering with a public record is a Class A misdemeanor. The maximum penalty for a Class A misdemeanor is one-year imprisonment and/or a fine of up to \$6,250.00.

MAINTENANCE

This policy will be reviewed annually for needed updates.

REVISION HISTORY

Revision Number	Author	Summary of Changes
1 – 06/25/2025	Records Management Officer	Update, title to include records, arranged order of information, removed redundancy, removed data management and cyber security, added deadline of 10 days for CEO to review appeals, and the fee schedule to fully burden rate.
2- 04/01/2026	Records Management Officer	Oregon Administrative Rules (OAR) updates to Chapter 166, Division 017 "Electronic recordkeeping system requirements."

Legal References: ORS Chapter 192; OAR Chapter 166; US Department of Transportation Circular FTA C 5010.1E

Related Forms: Exhibit 1 - Public Records Request Form, Exhibit 2 - Public Records Request Fee Schedule, Exhibit 3 - Fee Reduction Waiver Request Form, Exhibit 4 - Public Interest Threshold Evaluation Form, Exhibit 5 - Public Records Request Denial Petition Form

Related Policies and Procedures: N/A

POLICY APPROVAL

Policy Stage	
New Policy	<input type="checkbox"/>
Revision	<input checked="" type="checkbox"/>
Rescind	<input type="checkbox"/>
Other:	Click or tap here to enter text.

Required Approval Type	
Chief Executive Officer (CEO) Approval	<input checked="" type="checkbox"/>
Board of Directors' Approval	<input type="checkbox"/>
Other:	Click or tap here to enter text.



Jameson Auten, Chief Executive Officer (CEO)

4-6-2024

Date

Public Records Request Form

Section A - Requestor Information

NAME OF REQUESTING INDIVIDUAL		TITLE
PHONE	FAX	E-MAIL
FIRM OR TRADE NAME		
MAILING ADDRESS		
CITY	STATE	ZIP

Section B - Records(s) Requested

Describe the record you are requesting. Please be as specific as possible and include enough detail to assist District staff in locating the record(s). Attach additional pages as needed.

DESCRIPTION OF RECORDS REQUESTED

Tips: Please include as many details as possible.

- If you are requesting video from a bus, to the best of your ability please include:
 - the bus number (this is different than the route number),
 - the direction the bus was going,
 - cross streets of the incident, and
 - date & time of the incident (see below for incident details needed).
- If this is an incident on the bus, please include:
 - boarding time and location,
 - deboarding time and location, and
 - the physical location on the bus (middle, rear, driver-side, passenger-side), and
 - details of the incident including description of people involved.
- If you don't know the name of the record, describe the information you believe is contained in it.

Public Record Request Fee Schedule
(As of July 1, 2025)

The District shall waive 30 minutes of employee time for all public records requests. There is an hourly rate for requests that take over 30 minutes, which will be calculated at the fully burdened hourly rate of the affected personnel. If the estimated time is over 30 minutes and costs over \$25, the Records Management Officer must confirm if the requestor wishes to proceed.

Fees are charged for employee time required to locate, retrieve, compile, review, and redact exempt information from the requested public records before release. Additionally, there are fees for the materials used.

Materials

1. Standard Copies
 - a. Black & White: \$.05 per page
 - b. Color: \$0.12 per page
 - c. Oversized documents (larger than 11" x 17"): Actual cost

2. Tapes, DVDs, CDs, USB Drives
 - a. CDs and DVDs: \$3.00 (plus staff time)
(If video must be reviewed for confidentiality, an additional research charge may be incurred for this review.)
 - b. Audio Tape - \$8.00 (plus staff time).
(If audio must be reviewed for confidentiality, an additional research charge may be incurred for this review.)
 - c. USB Drive - \$10.00 (plus staff time).
(If contents must be reviewed for confidentiality, an additional research charge may be incurred for this review.)

3. Miscellaneous
 - a. Postage: Actual postage cost
 - b. Certifying Copy of Public Record - \$5.00

Attorney Fees

LTD may charge for attorney fees for the actual cost of time spent by an attorney in reviewing the public records, redacting material from the public records, or segregating the public records into exempt and nonexempt records.

Public Interest Fee-Waiver or Reduction Request

HOW TO USE THIS FORM:

Lane Transit District (“District” or “LTD”) has fee waiver or reduction provisions for requests that are made in the public interest because making the record available primarily benefits the general public.

The fee waiver applies to District staff time only and does not apply to services provided by outside vendors. LTD will bill requestors using the reduced fee-schedule for any costs above the waived amount, if costs are not waived in full.

LTD may still charge for either record review or copying based on the following factors:

1. Any financial hardship on the District;
2. The extent of time, expense, and interference with the District’s regular business;
3. The volume of the records requested;
4. The necessity to segregate exempt from non-exempt materials; or
5. The extent to which the record request does not further the public interest or the particular needs of the requestor.

LTD requires that a requesting party fill out this form completely.

Note:

Requests for fee-reduction or waiver will be evaluated on a case-by-case basis based on:

- The information provided by the requestor; and
- The totality of circumstances at the time of the request.

Previous requests and evaluations will not be considered as part of the evaluation.

Exhibit 3 – Fee Reduction Waiver Request Form

LTD requires that a requesting party fill out this form completely.

Name of requesting party:		Date:
Representing (group/organization):		
Address:		
City:	State:	Zip-code:
Phone:	E-mail:	

PLEASE COMPLETE THE FOLLOWING QUESTIONS:

1. Specific documents requested:
2. General background/mission information regarding requesting individual/group/organization as this information relates to public record requests from LTD:
3. Purpose for which the requesting party intends to use the information/records requested:
4. Specific ability (and plans) of requesting party to disseminate the information to the general public:
5. Explain how dissemination of the records/information requested will benefit the general public:
6. Any other information that requesting party feels would be valuable in evaluating fee waiver/reduction request:

Public Interest Threshold Evaluation Form

HOW TO USE THIS FORM:

The District is statutorily required to consider and grant reasonable requests to waive and/or reduce fees associated with fulfilling a public records request when doing so is in the public interest because providing access primarily benefits the general public.

The Public Interest Threshold Evaluation provides the District with standardized criteria to use when evaluating a request for a fee-reduction/waiver submitted by a public records requestor. The District shall consider each factor to determine whether the public interest in disclosure of the requested records warrants granting a fee-reduction/waiver.

All requests for a Public Interest Fee-Waiver or -Reduction will be evaluated on a case-by-case basis using information provided by the requestor as well as information independently available to the District.

ADDITIONAL GUIDANCE:

- To adequately balance the District's obligation to be transparent and accessible with the obligation to prudently safeguard public funds and resources, fee-waivers, and -reductions should be granted when the statutory standard has been met – when disclosure will primarily benefit the general public.
- A request to waive or reduce fees related to a public records request, that requires substantial District resources to complete, may be denied if the interest of the general public would be better served by preserving District resources.
- The public interest is not a fixed concept and the balance of public interest may change over time. It may shift as information becomes older or in the light of issues of the day. The circumstances at the time of the request will be considered.
- A genuine public interest in the subject matter of a request is required as the basis for granting a waiver. The public interest is not necessarily the same as what interests the public. The fact that a topic has been discussed in the media does not automatically mean that there is a public interest in disclosing the information that has been requested about it.
- This standardized fee-structure does not supersede, modify, or replace the existing legal responsibilities of the District. The District must continue to meet obligations required by applicable laws, policies, procedures, and standards including without limitation: State and Federal public records laws, privacy laws and regulations, and fees for certain public records as defined in statute.

Note:

Requests for fee-reduction or waiver will be evaluated on a case-by-case basis based on:

- The information provided by the requestor; and,
- The totality of circumstances at the time of the request.

Previous requests and evaluations will not be considered as part of the evaluation.

Exhibit 4 – Public Interest Threshold Evaluation Form

Public Interest Threshold Evaluation Form

Name of Requestor _____ Date of Request _____

Requested Record(s):

PUBLIC INTEREST THRESHOLD CRITERIA EVALUATION

The District shall consider the criteria below to determine whether waiving or reducing the costs associated with fulfilling a public records request would serve the public interest by primarily benefiting the general public.

	Public Interest	Yes	No
1	Would disclosure of the requested information, directly impact, affect, or serve an identified interest of the general public?		
2	Would the requested information advance the welfare or well-being of the general public?		
3	Will the requestor be able to actually, meaningfully disseminate the requested information?		

	Private or Commercial Interest	Yes	No
4	Is the public benefit greater than the individual benefit derived from disclosure?		
5	Is there a specifically identified purpose for which the public records are being sought that is wholly unrelated to 1) commercial purposes; or 2) actual or possible use in connection with administrative, judicial or legal proceedings?		

	Reasonableness	Yes	No
6	Is the request targeted at a specifically identified matter (meaning, not overly-broad or -complex)?		
7	Can the District grant a waiver or reduce fees without causing an unreasonable burden on District resources?		
8	Is the public interest served by disclosure greater than the burden to the District (amount of staff time diverted to fulfilling a request and costs of subsidization)?		

District Determination/Decision:		
Employee Name (print)	Signature:	Date:

A yes or no determination regarding a single criterion or for the majority of the criteria does not guarantee the granting of a fee reduction or waiver. Each request will be considered on a case-by-case basis, based on the information provided by the requestor and the totality of the circumstances at the time of the request.

Public Records Request Denial Petition Form

Date: _____

I (we), _____(name(s)), the undersigned, request the Chief Executive Officer (CEO) of Lane Transit District to make available for inspection or produce a copy or copies of *the following records*:

I (we) asked to inspect and/or copy these records on : _____(date).

The request was denied by the following person(s):

(Name of public officer or employee; title or position, if known)

The request was denied for the following reason(s):

Signature(s):

Lane Transit District Use Only

District CEO Determination/Decision:

Support Denial

Order records to be inspected or copied

Additional Comment:

Signature and Date: