Rights and Responsibilities

It is important that you understand your rights and responsibilities. Please ask your Kinship Case Worker to explain these rights if you have any questions.

**Rights**

***You have the right to…***

* Be treated with respect and dignity.
* All constitutional rights.
* Fair and equitable treatment.
* Receive services regardless of your race, sex, age, religion, ethnicity, cultural background, financial status and/or disability.
* Be ensured that all records and information are secure and confidential (as per the Health Insurance Portability and Accountability Act HIPAA).
* Have your rights explained to you in a manner that is clear.
* Understand the documents you are asked to sign.
* To know that we are responsible to report abuse and/or neglect.
* Expect the Kinship Worker to maintain a high standard of ethics in regard to you and your family.
* To know who your Kinship Worker is and to know how to contact them if you have questions.
* Refuse services unless the law states otherwise, and the right to be informed about the consequences of such a refusal, which can include discharge.
* Submit a complaint if you are unhappy with the services you are receiving and to receive a response within a reasonable time frame.
* Actively participate in the services offered.
* Services and supports that are individualized, built on strengths, resources, values and preferences, and take your family’s culture into consideration.
* Services and supports that meet the needs of you and your family, and reflect your priorities, goals and vision.
* Make decisions regarding the types of services that are provided and the person/agency who will provide the service.
* Participate as active partners in the process and have a voice and a choice in decision making.
* Work together with a team to develop, implement and evaluate your Case Plan.
* Invite others you view as supporters to participate with you in your Family Team Conference.
* Receive copies of your Case Plan and any other relevant documents.
* Be provided with a description of the measurable goals and timeframes for achieving the overall goal(s) of the Case Plan.

Responsibilities

***You have the responsibility to…***

* Contact the Florida Abuse Hotline (1-800-96-ABUSE) and/or any other professional involved with you to report allegations of abuse or neglect.
* Be honest in giving information that is requested by the family team in order to be accepted for service and set up a Case Plan.
* Comply with all Kid’s Central, Inc.’s rules, policies and procedures.
* Work towards achieving Case Plan goals.
* Respect the privacy/confidentiality of others receiving services.
* Not behave in any way that threatens or endangers another person and to understand that such activity could result in discharge.
* Keep your Kinship Worker informed of your address and phone number throughout the duration of services.
* Contact your Kinship Worker if you are cancelling an appointment or meeting at least 24 hours in advance.
* Follow up with services and treatment.
* Notify your Kinship Worker if you have any concerns.

Informed Consent for Photos and Video/Voice Taping

To protect your privacy, if you are asked to be photographed, video/audio taped, or to be viewed through a one-way mirror, you must first be told of this and you must agree to it. If you do not agree, the activity cannot be done. If you agree, you will:

* Receive a written description of the request and the reasons for it.
* Not be encouraged, given payment, or the incentives to agree to the request.
* Be asked to sign a form giving informed consent.

Confidentiality

It is the policy of Kids Central, Inc. to protect the rights and privacy of children and families in gathering and disseminating information and in all promotional activities. All information regarding past, present and future clients and/or their relatives is considered to be confidential and is covered by these procedures:

**Need-to-Know Basis**

* Information is shared among staff, agencies, and foster parents only on a need to-know basis.
* Under no circumstances will a staff member share information about past, present and future clients outside his/her responsibilities and duties as a staff member working on a specific case.
* If approached by an individual seeking information outside these parameters, the staff member will decline to offer information and direct the individual to the appropriate agency staff.
* Staff will practice extreme diligence in sharing information only in staff secure areas and will not discuss clients in any area where members of the public may hear.
* Volunteers who work with Kids Central and its network providers are also subject to the need-to-know rule.
* Staff that oversees the work of volunteers will share minimal information with volunteers about specific clients, sharing information only to the extent that it impacts the scope of the volunteer's work with the client.
* All Kids Central staff, providers, volunteers, and caregivers will receive appropriate training on confidentiality and ethical standards.
* Client records may be reviewed by designated Kids Central or network provider staff, as directed and approved, when related to quality improvement activities.

**Access to Records**

* At no time is information regarding clients, relatives, and/or other relations to be released to any person without prior written consent of the client, or in the event of a minor child, his/her parent or legal guardian, or under subpoena of the judicial system.
* Kids Central Staff will utilize the Authorization for Release of Confidential Information and maintain a copy of this form in the identified family’s case record.
* At no time are there to be public appearances by children involving publicity or fundraising without written consent of the child’s parent or legal guardian. All such appearances are strictly voluntary.
* Photographs will not be taken of children without written consent of the child's parent or legal guardian. (Exceptions are the required photographs for identification purposes.)
* All client records will be handled in a manner which protects the nature of the information contained within them. When offices are closed, all client records will be kept in locked files.
* All automated records meet standards for security to ensure all users see only the information appropriate for their needs.
* All records regarding clients seen at the Service Centers are considered the property of the Kids Central.
* All Kids Central employees will receive a copy of this operating procedure upon employment and training provided will review all statutory authority.

**General Requirements for Release of Information**

* Information in case records generated as a result of child abuse and neglect investigations is confidential and may be released only under specific circumstances outlined in the referenced Florida Statutes.
* Kids Central employees will consult with the Kids Central attorney prior to responding to requests for information.
* In the event that a file contains the name of and any identifying information about the person reporting abuse or neglect is strictly confidential and will not be released (without the written consent of the person reporting) to any person other than employees of Kids

Central who are responsible for child protective services, including protective investigation, protective services, and foster care staff, the abuse hotline, or the appropriate state attorney.

* In the event that a file contains the name of and all information identifying the reporter is present in the case file, it will be blacked out before allowing access by persons authorized by law to examine copies of records.
* Any information in the case record that pertains to the adoption of a child or a child’s sibling will not be released without first consulting with the District Legal Counsel Access to adoption records is governed by the provisions of section 63.162, F.S., and usually requires a court order.
* If a case record contains medical, psychological, or psychiatric reports, school records, or information about clients received from domestic violence centers that Kids Central
* has obtained through consent of the subject, the information will not be released without written authorization of that subject.
* All records and reports of the Child Protection Team (CPT) are confidential and exempt from the provisions of sections 119.07(1) and 455.232, F.S., and will not be disclosed, except upon request, to the state attorney, law enforcement, Kids Central, and necessary professionals in furtherance of the treatment or additional evaluative needs of the child, or by order of the court.
* Anyone to whom copies of an abuse report and related case material is given is subject to the same requirements to maintain confidentiality as is Kids Central employee releasing the information.

**Special Requirements Related to HIV/AIDS Records**

* Case narrative will not contain any reference to the child’s HIV infection or AIDS.
* Medical documentation needed for school enrollment, daycare or similar purpose will be provided separately by the physician and may not contain any reference to the child’s HIV/AIDS status.
* With the exception of the child’s medical records provided to substitute care parents (and to the child’s natural parents or other legal guardian), case material which discloses that the child has HIV infection or AIDS will be kept within the file in a “Confidential Information” envelope used to safeguard sensitive case information.
* The child’s case records will not be segregated or flagged in any way which would

permit their identification as case records of HIV-infected children.

* In order to protect children with communicable diseases the following written statement will be provided to the caregiver or provider: “This information has been disclosed to you from records whose confidentiality is protected by state law. State law prohibits you from making any further disclosure of such information without the specific written consent of the person to whom such information pertains, or as otherwise permitted by state law.”

**Allowable Access**

* Employees or agents of Kids Central, DCF, and investigation agencies responsible for child investigations, adult investigations, ongoing child or adult protective services, or licensure or approval of adoptive homes, foster homes, or other homes used to provide for the care and welfare of children (NOTE: Licensing files are public record; therefore, any abuse or neglect records will be kept segregated to avoid inadvertent disclosure).
* Employees or agents of the Department of Juvenile Justice who are responsible or provision of service to the child.
* Criminal justice agencies of appropriate jurisdiction.
* State attorney of the judicial circuit in which the child resides or in which the alleged abuse or neglect occurred (access includes name of reporter).
* Access will be granted to parents or custodians of any child who is alleged to have been abused, neglected, or abandoned no later than 30 days after the Investigating Agency receives the initial report of abuse, or upon transfer of the case to Kids Central
* All exempt or otherwise confidential information (such as food stamp records; independent medical, psychological, or psychiatric reports; CPT records; and HIV information) shall not be released unless it has been filed in the official court.
* Access will be granted to any person alleged in the report as having caused the abuse, neglect, or abandonment of a child no later than 30 days after the initial report or upon transfer of the case to Kids Central.
* Court access shall be limited to inspection in camera, unless the court determines that public disclosure of the information is necessary for the resolution of an issue then pending before the court.
* Appropriate DCF officials, Human Rights Advocacy Committee, Guardian Ad Litem, if related to case-specific activity, and the Quality Improvement Committee.
* Any additional persons or entities authorized by Chapter 39.202(2) (i).
* Employees or agents of a counterpart social services agency in another state, if related to case specific activity.

**Penalties**

* A person who knowingly and willfully makes public or discloses to any unauthorized person any confidential information is subject to the penalty provisions of section 775.082 and 775.083, F.S. (second degree misdemeanor).
* A person who knowingly and willfully makes public or discloses to any unauthorized person HIV/AIDS information is subject to penalty provisions of sections 384.34, 775.082, 775.083, and 775.084 of Florida Statute.

**Florida Safe Families Network (FSFN)**

The Florida Safe Families Network is the current state reporting system. This system is used to databank all case history and activity and all information is confidential to include the following:

* Demographics of all case participants and household members.
* Current legal status and history
* Case type
* Chronological Notes
* Court hearings
* Case Plan goal
* Efforts toward permanency
* Health, educational and mental health information on the children.
* Current location of children

HIPAA Procedure

It is the policy of Kids Central to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) relating to the privacy requirements for Protected Health Information (PHI).

**Procedure**

**Who Will Follow This Notice?**

This notice describes our practices and that of any health care professional authorized to enter information into your case file:

* All departments and units of Kids Central.
* Any member or employee of a contract or volunteer group providing assistance on behalf of Kids Central.
* All employees, staff and other personnel of Kids Central.
* All these entities, sites and locations follow the terms of this notice. In addition, these entities, sites and locations may share medical information with each other for treatment, payment or Kids Central operations purposes described in this notice.

**Kids Central’s Pledge Regarding Medical Information**

We understand that medical information about you and your health is personal. We are committed to protecting medical information about you. We create a record of the care and services you receive at Kids Central We need this record to provide you with quality care and to comply with certain legal requirements. This notice applies to all of the records of your care generated by Kids Central Other health care rehabilitation facilities may have different policies or notices regarding use and disclosure of your medical information.

This notice will tell you about the ways in which we may use and disclose medical

information about you. We also describe your rights and certain obligations we have

regarding the use and disclosure of medical information. We are required by law to:

* Make sure that medical information that identifies you is kept private.
* Give you this notice of our legal duties and privacy practices with respect to medical information about you.
* Follow the terms of the notice that is currently in effect.

**How Kids Central is Required by Law to Disclose Medical Information**

* **As Required By Law** - We will disclose medical information about you when required to do so by federal, state or local law.
* **To Avert a Serious Threat to Health or Safety** - We will use and disclose medical information about you when we have a “Duty to Report” under state or federal law; because we believe that it is necessary to prevent a serious threat to your health and safety or the health and safety of the public or another person. Any disclosure, however, would only be to someone able to help prevent the threat.
* **Public Health Risks** -We will disclose medical information about you for public health reporting required by federal or state law. These activities generally include the following:
* To prevent or control disease, injury or disability.
* To report births and deaths.
* To report child abuse or neglect.
* To report reactions to medications or problems with products.
* To notify people of recalls of products they may be using.
* To notify a person who may have been exposed to a disease or may be at risk for contracting or spreading a disease or condition.
* To notify the appropriate government authority if we believe a Client has been the victim of abuse, neglect or domestic violence. We will only make this disclosure if you agree or when required or authorized by law.
* **Health Oversight Activities** - We will disclose medical information as required by law to a health oversight agency for activities authorized by law. These oversight activities include, for example, audits, investigations, inspections, and licensure. These activities are necessary for the government to monitor the health care system, government programs, and compliance with civil rights laws.
* **Lawsuits and Disputes** - If you are involved in a lawsuit or a dispute, we will disclose medical information about you when properly ordered to do so by a court.
* **Law Enforcement** –We will release medical information if asked to do so by a law enforcement official, and if permitted by law:
* In response to a court order.
* If required by state or federal law.
* To identify or locate a suspect, fugitive, material witness, or missing person.
* About the victim of a crime if, under certain limited circumstances, we are unable to obtain the person's agreement.
* About a death we believe may be the result of criminal conduct.
* About criminal conduct at a Kids Central facility.
* In emergency circumstances to report a crime; the location of the crime or victims; or the identity, description or location of the person who committed the crime.
* **Protective Services for the President and Others** - We will disclose medical information about you to authorized federal officials so they may provide protection to the President, other authorized persons or foreign heads of state or conduct special investigations.

**How Kids Central May Use and Disclose Medical Information**

The following categories describe different ways that we use and disclose medical information. For each category of uses or disclosures we will explain what we mean and try to give some examples. Not every use or disclosure in a category will be listed. However, all of the ways we are permitted to use and disclose information will fall within one of the categories.

* **For Treatment** -We may use medical information about you to provide you with medical treatment or services. We may disclose medical information about you to doctors, psychologists, nurses, social workers, therapists, technicians, medical students, or other Kids Central personnel who are involved in taking care of you. Different departments of the Kids Central also may share medical information about you in order to coordinate the different things you need. We also may disclose medical information about you to people outside Kids Central, such as other health care providers involved in providing medical treatment for you and to people who may be

involved in your medical care, such as family members, clergy or others we use to provide services that are part of your care.

* **For Payment** - We may use and disclose medical information about you so that

the treatment and services you receive at Kids Central, or other health care providers from whom you receive treatment, may be billed to, and payment may be collected from, you, an insurance company or a third party. For example, we may need to give your health plan information about treatment you received at Kids Central so your health plan will pay us or reimburse you for your treatment. We may also tell your health plan about a treatment you are going to receive to obtain prior approval or to determine whether your plan will cover the treatment.

* **For Health Care Operations** - We may use and disclose medical information about you for Kids Central operations or to another health care provider or health plan, if you have a relationship with that health care provider or health plan. These uses and disclosures are necessary to run Kids Central and make sure that all of our consumers receive quality care. For example, we may use medical information to review our treatment and services and to evaluate the performance of our staff in caring for you. We may also combine medical information about many consumers to decide what additional services Kids Central should offer, what services are not needed, and whether certain new treatments are effective. We may also disclose information to doctors, social workers, therapists, nurses, psychologists, technicians, medical students, and other personnel for review and learning purposes. We may also combine the medical information we have with medical information from other health care rehabilitation facilities to compare how we are doing and see where we can make improvements in the care and services we offer. We will remove information that

identifies you from this set of medical information so others may use it to study health care and health care delivery without learning who the specific consumers are.

* **Appointment Reminders** -We may use and disclose medical information to contact you as a reminder that you have an appointment for treatment or medical care at Kids Central.
* **Treatment Alternatives** - We may use and disclose medical information to tell you about or recommend possible treatment options or alternatives that may be of interest to you.
* **Health-Related Benefits and Services** - We may use and disclose medical information to tell you about health-related benefits or services that may be of interest to you.
* **Fundraising Activities** - We may use medical information about you to contact you in an effort to raise money for Kids Central and its operations. We only would utilize contact information, such as your name, address and phone number and the dates you received services at Kids Central If you do not want Kids Central to contact you for fundraising efforts, you must notify Privacy Officer, in writing.
* **Individuals Involved in Your Care or Payment for Your Care** - We may release certain limited information about you to a friend or family member who is involved in your services. We may also give information to someone who helps pay for your care. We may also tell your family or friends your condition. In addition, we may disclose medical information about you to an entity assisting in a disaster relief effort so that your family can be notified about your condition, status and location.
* **Research** - Under certain circumstances, we may use and disclose medical information about you for research purposes. For example, a research project may involve comparing the health and recovery of all consumers who received one medication to those who received another, for the same condition. All research projects, however, are subject to a special approval process. This process evaluates a proposed research project and its use of medical information, trying to balance the research needs with consumers' need for privacy of their medical information. Before we use or disclose medical information for research, the project will have been approved through this research approval process, but we may, however, disclose medical information about you to people preparing to conduct a research project, for example, to help them look for consumers with specific medical needs, so long as the medical information they review does not leave Kids Central. We will ask for your specific permission if the researcher will have access to your name, address or other information that reveals who you are, or will be involved in your services.

**Special Situations**

* **Organ and Tissue Donation** - If you are an organ donor, we may release medical information to organizations that handle organ procurement or organ, eye or tissue transplantation or to an organ donation bank, as necessary to facilitate organ or tissue donation and transplantation.
* **Military and Veterans** - If you are a member of the armed forces, we may release medical information about you as required by military command authorities. We may also release medical information about foreign military personnel to the appropriate foreign military authority.
* **Coroners, Medical Examiners and Funeral Directors** - We may release medical information to a coroner or medical examiner. This may be necessary, for example, to identify a deceased person or determine the cause of death. We may also release medical information about consumers of Kids Central to funeral directors as necessary to carry out their duties.
* **National Security and Intelligence Activities** - We may release medical information about you to authorized federal officials for intelligence, counterintelligence, and other national security activities authorized by law.
* **Inmates** - If you are an inmate of a correctional institution or under the custody of a law enforcement official, we may release medical information about you to the correctional institution or law enforcement official. This release would be necessary (1) for the institution to provide you with health care; (2) to protect your health and safety or the health and safety of others; or (3) for the safety and security of the correctional institution.

**Rights Regarding Medical Information**

* **Right to Inspect and Copy** - You have the right to inspect and copy medical information that may be used to make decisions about your services. Usually, this includes medical and billing records, but does not include psychotherapy notes. To inspect and copy medical information that may be used to make decisions about you, you must submit your request in writing to the Kids Central Privacy Officer. If you request a copy of the information, we may charge a fee for the costs of copying, mailing or other supplies associated with your request. We may deny your request to inspect and copy in certain very limited circumstances. If you are denied access to medical information, under some circumstances you may request that the denial be reviewed. Another licensed health care professional chosen by Kids Central will review your request and the denial. The person conducting the review will not be the person who denied your request. We will comply with the outcome of the review.
* **Right to Amend** - If you feel that medical information we have about you is incorrect or incomplete; you may ask us to amend the information. You have the right to request an amendment for as long as the information is kept by or for Kids Central. To request an amendment, your request must be made in writing and submitted to The Kids Central Privacy Officer. In addition, you must provide a reason that supports your request. We may deny your request for an amendment if it is not in writing or does not include a reason to support the request. In addition, we may deny your request if you ask us to amend information that:
* Was not created by us, unless the person or entity that created the information is no longer available to make the amendment.
* Is not part of the medical information kept by or for the hospital.
* Is not part of the information which you would be permitted to inspect and copy.
* Is accurate and complete.
* **Right to an Accounting of Disclosures** - You have the right to request an "Accounting of Disclosures." This is a list of the disclosures we made of medical information about you.

To request this list or accounting of disclosures, you must submit your request in writing to The Kids Central Privacy Officer. Your request should indicate in what form you want the list (for example, on paper, electronically). The first list you request within a 12 month period will be free. For additional lists, we may charge you for the costs of providing the list. We will notify you of the cost involved and you may choose to withdraw or modify your request at that time before any costs are incurred.

* **Right to Request Restrictions** - You have the right to request a restriction or limitation on the medical information we use or disclose about you for treatment, payment or health care operations. You also have the right to request a limit on the medical information we disclose about you to someone who is involved in your care or the payment for your care, like a family member or friend. For example, you could ask that we not use or disclose information about a specific treatment session you had. We are not required to agree to your request. If we do agree, we will comply with your request unless the information is needed to provide you emergency treatment. To request restrictions, you must make your request in writing to The Kids Central Privacy Officer. In your request, you must tell us (1) what information you want to limit; (2) whether you want to limit our use, disclosure or both; and (3) to whom you want the limits to apply, for example, disclosures to your spouse.
* **Right to Request Confidential Communications** - You have the right to request that we communicate with you about medical matters in a certain way or at a certain location. For example, you can ask that we only contact you at work or by mail. To request confidential communications, you must make your request in writing to The Kids Central Privacy Officer. We will not ask you the reason for your request. We will accommodate all reasonable requests. Your request must specify how or where you wish to be contacted.

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* **Right to a Paper Copy of This Notice** - You have the right to a paper copy of this notice. You may ask us to give you a copy of this notice at any time. Even if you have agreed to receive this notice electronically, you are still entitled to a paper copy of this notice. You may obtain a copy of this notice at our website, [www.kidscentralinc.org](http://www.kidscentralinc.org) you may request an unsigned copy of this notice at any time from the staff member coordinating your services at Kids Central.

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**Changes To This Notice**

* We reserve the right to change this notice. We reserve the right to make the revised or changed notice effective for medical information we already have about you as well as any information we receive in the future. We will post a copy of the current notice in each of our facilities. The notice will contain on the first page, in the top right-hand corner, the effective date. In addition, each time copy of the current notice in effect.

**Complaints**

* If you believe your privacy rights have been violated, you may file a complaint. All complaints must be submitted in writing. You will not be penalized for filing a complaint.

To file a complaint with Kids Central, Inc. mail to the following address:

 Kids Central Privacy Officer

 2117 SW Highway 484

 Ocala, FL 34473

 Telephone: (352) 873-6332; Fax: (352) 387-3558

To file a complaint with the federal government, you may send your complaint to the following address:

 Office for Civil Rights

 Department of Health and Human Services

 Atlanta Federal Center

 Ste. 3B70

 61 Forsyth Street SW

 Atlanta, GA 30303-8909

Telephone: (404) 562-7886; Fax: (404) 562-7881;

TDD: (404) 331-2867

**Other Uses Of Medical Information**

* Other uses and disclosures of medical information not covered by this notice or the laws

that apply to us will be made only with your written permission.

Civil Rights

Clients and potential clients of Kids Central, Inc. who believe that they have been discriminated against may file a written complaint of discrimination within 180 days of the alleged discriminatory act with:

 Assistant Staff Director for Civil Rights

DCF Office of Inspector General

Office of Civil Rights

1317 Winewood Blvd.

Building 5, 2nd Floor

Tallahassee, FL 32399-0700

Telephone: (850) 487-1901

TDD: (850) 922-9230

 United States Department of Health and Human Services

 Attention: Office for Civil Rights

 Atlanta Federal Center, Ste. 3B70

 61 Forsyth Street SW

 Atlanta, GA 30303-8909

 Telephone: (404) 562-7886; Fax: (404) 562-7881;

 TDD: (404) 331-2867

Complaint and Grievance Procedure

It is the policy of Kids Central to hear all client complaints and to support the dignity and rights of all clients. Any complaint/grievance can be made by email, mail, telephone, in person, or via Department of Children and Families (DCF) Client Relations. All complaints will be handled through the Kids Central Director of Prevention Services. It is the responsibility of the Director of Prevention Services to investigate and seek resolution to all complaints. The Director of Prevention Services will take appropriate steps to mitigate the effects of any violation of client’s rights. This policy assures that grievances are resolved quickly and at the lowest level possible.

**Receipt of a Complaint**

* The Kids Central Corporate office and DCF Client Relations will forward all complaints and/or grievances to the Director of Prevention Services.

**Complaint Investigative Process**

* The Director of Prevention Services is responsible for investigating the circumstance of the alleged rights violation, and if appropriate shall take steps to resolve the issue.
* The Director of Prevention Services may consult with CEO, Kids Central Chief’s, CLS, CBC Directo**r**s, and/or other professionals in reviewing and acting upon complaints/grievances.
* The Director of Prevention Services shall either communicate the results of the investigation and resolution to the grievant or forward the results to the DCF Client Relations within the specified time frames given by DCF Circuit 5 Headquarters.

**Decision and Disposition**

* If the results of the investigation indicate that a Kids Central employee or a contracted Kids Central employee has violated the rights of a client, the following will occur:
* The results will be reported to the Chief Executive Officer of Kids Central.
* The Chief Executive Officer of Kids Central will determine what course of action to take against the employee violating the rights of clients.
* The CEO of Kids Central may impose monetary infraction against the CMA and/or disciplinary action that could result in termination of an employee.
* If the complaint/grievance is not resolved by the Director of Prevention Services to the client’s satisfaction, the issue will be referred to the CEO of Kids Central.
* The issue shall be resolved as quickly as possible and an update shall be maintained with the party filing the grievance/complaint.

**No Retaliation**

* There shall be no retaliation against any individual or person served, or employee for having filed or assisted on the filing of a complaint/grievance, or for investigation or acting on a complaint/grievance.
* Any employee who becomes aware of any such retaliatory action shall immediately report it to the Director of Prevention Services.

**Monitoring**

* The Director of Prevention Services will collect and analyze information from Circuit 5 CMAs and Kids Central Corporate to determine trends within the Circuit that need to be resolved.
* These trends will be reported to the Kids Central CEO to determine what course of action needs to be taken to diminish any negative trends that are noted.