



Title Client & Child Case Records: Confidentiality, Release, and Public Access		Number 1302	
Department: Data Management	Owner: Quality Management Projects Supervisor	Regulatory Authority/ Related Policies: CFOP 60-17/170-1, CFOP 15-12, 170-1, CFOP 15-9, FS 39.00145, 39.202 F.S., 119.07 F.S.	Attachments: NA
Effective Date: November 2013		Last Revision: 03/16/2026	Review Date: March 2026

Policy Communities Connected for Kids (CCKids) is committed to protecting the privacy and rights of children and families. The organization ensures that all information is gathered, used, and shared in compliance with applicable confidentiality laws. Client information may only be released to individuals authorized under Florida Statute. All employees are required to follow the Florida Public Records Act and related public records laws, with final approval and guidance on record requests provided by the agency's contracted attorney.

Procedure

The following guidelines are established to ensure compliance with s.39.00145, Florida Statutes, establishing clear authorization for the release of case records of a child that is or has been under the supervision of Communities Connected *for* Kids. The guidelines apply to children currently or previously under protective services governed by Chapter 39 F.S.

1. When a case manager or other provider in the local system of care receives a request from an authorized party for a case record, notification of such request must be emailed to flcbcdms@cckids.net which will notify all relevant parties of the request (e.g., Communities Connected *for* Kids point of contact, Communities Connected *for* Kids legal counsel, DCF regional counsel, etc.). This request must be submitted no later than 24 hours after receiving the request.
2. The Director of Quality & Data Management or designee will serve as the single point of contact responsible for ensuring that the complete case record is retrieved and processed upon receipt of request.
3. An initial redaction of documents shall be performed by Communities Connected *for* Kids Legal Counsel or designee and submitted to the single point of contact within a reasonable period of time of receipt of the request. Following redaction, when appropriate, the case record must be submitted to Regional General Counsel Offices' as applicable by the single point of contact for review and approval of release which may occur within a reasonable period of time of receipt of Regional General Counsel.
4. The single point of contact, or designee must notify the requesting party within two days of receipt of the record that the file will be securely shared with the requestor electronically.
5. The authorized party will be notified by the single point of contact if there are any delays in the ability to respond to the request for the case record within a reasonable time frame.



6. The case record must contain, at a minimum, the child's case plan required under part VII of chapter 39 and the full name and street address of all shelters, foster parents, group homes, treatment facilities, or locations where the child has been placed.
7. Service recipients may add a statement to their case records, and any response by personnel is added with the service recipient's knowledge; and the service recipient is given the opportunity to review and comment on such additions. At case closing, case records are reviewed and unsummarized notes, personal observations, and impressions are expunged.
8. Reviews of case records by service recipients are conducted in the presence of professional personnel on the organization's premises if it is determined that the nature of the information being released is not appropriate due to the age and maturity of the child; and carried out in a manner that protects the confidentiality of family members and others whose information may be contained in the record.

What is a Public Record:

1. Public records are all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software or other materials, regardless of physical form, or characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.
2. Personnel records are open to inspection unless exempt by law. This includes applications, resumes, third party communications (e.g., references), salary information, grievance records, and travel vouchers. Those items which are deemed confidential are redacted and the document is released.
3. There are no "unfinished business" exceptions to public inspections and copying requirements. Any agency document circulated for review, comment, or information (including memorandum, drafts, or proposals) is a public record regardless of whether it is marked "preliminary" or "working draft". A non-final document need not be communicated to anyone in order to constitute a public record.

Exemptions to the Public Records Law

1. State and federal law exempts certain categories of documents from disclosure under the public records law. These laws must be strictly followed when redacting public records. Only the exact information specified in the laws can be redacted from the records. Most exemptions recognized by Florida law are found in s.119.07, Florida Statutes. Additional exemptions can be found in other Florida statutes.

Procedure for Responding to Public Record Requests:

1. Requests may be made in writing or orally. All public records requests regarding active or inactive client files should be made through flcbcdms@cckids.net for processing. Once the record/client file has been electronically produced the requested record will be sent to the agency's in-house counsel or designee for the appropriate redactions.
2. Public Request that do not include any type of confidential information will be sent for approval to the in-house attorney or designee for release approval.
3. Agency contact will be made with the requester simply stating that their request has been received and that they have been designated to assist with their public records request.
4. Documents that do not fall within the definition of a public record need not be produced. Records, in whatever form, which are public records, must be produced, but the exempt information must first be redacted. The individual/s redacting the documents must keep a log of all of the redacted information.



5. The log should include the page where the redaction is located, a brief description of what was redacted, and the statutory cite relied upon in making the redaction. Any determination as to whether or not a document is a public record or contains exempt information will be made by the agency's in-house counsel or designee.
6. Requests for copies of a complete file or record should be examined closely in order to minimize costs to the requester. All requesters should be advised of their right to review the file or record and select only useful information for duplicating. A requester still wanting a duplication of a complete file or record will be provided copies upon receipt of payment for fees assessed as allowable by law.
7. Communities Connected *for Kids* may charge a requester to duplicate a public record. In addition, if duplicating the public records requires *extensive* use of information technology resources or clerical and/or supervisory assistance, Communities Connected *for Kids* may assess a reasonable service charge based on the actual costs incurred. All charges must be collected before the documents are copied and produced.
8. An estimate of the charges must be provided to the requester by letter or e-mail. (Attachment A - Sample Letter Requesting Payment)

Procedure for Duplicating Records Containing Redacted Material

In the event that Xerographic copying of redacted records is needed, xerographic copying often produces "bleed through" resulting in the portions sought to have been redacted remaining readable when held up to a light source. To eliminate "bleed through", the records must be copied and the portions of the records being blacked out must be thoroughly blackened out. The blacked-out copies are then recopied, whereupon the blacked-out portions are not subject to being read even when subjected to background light.

Fees for Providing Copies

1. When providing a copy of a public record to a client or the general public, the fee which may be charged is the fee prescribed by law or, if not prescribed by law, the fee is:
Up to 15 cents per page
2. The "actual cost of duplicating" means the cost of labor or overhead cost associated with such duplication, including electronic file copy, uploads, and system security measures.
3. A special service charge (if applicable pursuant to section 119.07(4)(d), F.S.) may be added to the fee for duplicating the requested material if the nature or volume of the public records being requested requires the extensive use of information technology resources or extensive clerical or supervisory assistance, or both. Upon request, the office assessing the special service charge will provide documentation supporting the assessment of the charge.

Payment of Fees

Fees are payable by cashier's check, money order, or personal check and must be collected prior to copying and producing the requested material. Checks and money orders must be made payable to Communities Connected for Kids. All checks and money orders must be hand delivered or sent via US postal mail to Communities Connected *for Kids*, 549 NW Lake Whitney Place, Suite 204, Port St. Lucie, Florida 34986

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/minimum necessary

1. Client information may only be shared with staff, agencies, or foster parents on a strict need-to-know basis. Staff must never share client details outside their job duties and should direct unauthorized inquiries to the appropriate agency personnel.
2. Staff must discuss client matters only in secure, private areas—not in public or common spaces where others may overhear.
3. Volunteers are also bound by the need-to-know rule. They should receive only minimal, relevant information required for their specific tasks and never personal or case-related details about clients or their families.
4. Foster parents should be regularly reminded to share only need-to-know information with other foster parents.
5. All staff, providers, volunteers, and caregivers, will receive proper training on confidentiality and ethical standards.

General Requirements for Release of Information

1. Information in case records generated as a result of child abuse and neglect investigations is confidential and may be released only under specific circumstances which are outlined in the referenced Florida Statutes. Communities Connected *for Kids* employees will consult with the agency's general counsel or the department's Child Legal Services (CLS) attorney prior to responding to requests for information. In the event that case record information is determined to be harmful to the service recipient by senior management, the reason for refusal will be submitted in writing in the case record and immediate guidance from the agency's attorney will occur and all applicable laws will be followed in the release or with holding of his or her case record.
2. The name of and any identifying information about the person reporting abuse or neglect is strictly confidential and must not be released (without the written consent of the person reporting) to any person other than authorized employees responsible for child protective services.
3. Any information in the case record that pertains to the adoption of a child or a child's sibling must not be released without consulting the agency's general counsel or CLS attorney. Access to adoption records is governed by the provisions of §63.162, F.S.

If a case record contains medical, psychological, or psychiatric reports, school records, or information about clients received from domestic violence centers, the information must not be released without written authorization of that subject. The person requesting access to the record should be told of the existence of any such report and referred to the generating source.

4. All records and reports of the child protection team (CPT) are confidential and exempt from the provisions of sections §119.07(1) and §455.241, F.S., and will not be disclosed, except upon request, to the department, State's Attorney, law enforcement and necessary professionals in furtherance of the treatment or additional evaluative needs of the child, or by order of the court.

Allowable Access

1. In order to protect the rights of the child and the child's parents or other persons responsible for the child's welfare, all records held by the department concerning reports of child abandonment, abuse, or neglect, including reports made to the central abuse hotline and all records generated as a result of such reports, shall be confidential and exempt from the provisions of s. [119.07\(1\)](#) and shall not be disclosed except as specifically authorized by 39.202 F.S. Such exemption from s. [119.07\(1\)](#) applies to information in the possession of those entities granted access as set forth in this section. Employees or agents of the Communities Connected for Kids and the Department of Children and Families, contacted



providers of Communities

Children and Families, The Department of Health, the Agency for Persons with Disabilities, the Agency for Health Care Administration, the Department of Education, Licensing units or county agencies responsible for carrying out:

2. Child or adult protective investigations;
3. Ongoing child or adult protective services;
4. Early intervention and prevention services;
5. Healthy Start services;
6. Employees or agents of the Department of Juvenile Justice who are responsible for provision of service to the child.
7. Criminal justice agencies of appropriate jurisdiction.
8. State's Attorney.
9. Parent or custodian of any child who is alleged to have been abused, neglected or abandoned. All exempt information will be excluded from view.
10. Any person alleged in the report as having caused the abuse, neglect or abandonment.
11. A grand jury, by subpoena, for the conduct of their official business.
12. Appropriate department and agency officials, Human Rights Advocacy Committee, and Guardian ad Litem if related to case-specific activity.
13. Any additional persons or entity authorized by §39.202(2) (i) F.S.

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 39.205, F.S. (second degree misdemeanor).

Approved by:

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Carol DeLoach

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Carol DeLoach, CEO

