

**Topic:** Compliance - General  
**Title:** **Public Records Policy**  
**Policy No.:** **COM 1.16**  
**Effective Date:** July 27, 2017  
**Last Review Date:** June 13, 2025; June 30, 2026  
**Last Revised Date:** June 13, 2025; June 30, 2026

## **PURPOSE:**

Pursuant to Tennessee Code Annotated (TCA) § 10-7-503(g), the following Public Records Policy for Williamson Health (WH), a Private Act Hospital District, is hereby adopted by the Board of Trustees of Williamson Health to provide economical and efficient access to public records, as required per the Tennessee Public Records Act (TPRA) in T.C.A. § 10-7-501 et seq.

This policy is available for inspection and duplication at the office of Williamson Health's Chief Compliance Officer, and is posted online at <https://williamsonhealth.org>. This policy shall be reviewed every three (3) years by the Compliance Committee and submitted to the Board of Trustees for approval if any changes are necessary.

This policy shall be applied consistently throughout the offices and departments of Williamson Health. Concerns about this policy or its application should be addressed to the Public Records Request Coordinator (PRRC) for Williamson Health.

The Tennessee Public Records Act (TPRA) provides that all state, county, and municipal records shall, at all times during business hours, be open for personal inspection by any citizen of this state, and those in charge of the records shall not refuse such right of inspection to any Tennessee citizen, unless otherwise provided by state law. Accordingly, the public records of Williamson Health are presumed to be open for inspection unless otherwise provided by law. Access to public records shall be limited to Tennessee citizens.

## **DEFINITIONS:**

- **Records Custodian:** The office, official, or employee lawfully responsible for the direct custody and care of a public record. The Records Custodian is not necessarily the original preparer or receiver of the record.
- **Public Records:** All documents, papers, letters, maps, books, photographs, microfilms, electronic data processing files and output, films, sound recordings, or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of official business by any governmental agency.

- **Public Records Request Coordinator:** The individual(s) who has (have) the responsibility to ensure public record requests are routed to the appropriate Records Custodian and are fulfilled in accordance with the TPRA. The Public Records Request Coordinator may also be a Records Custodian.
- **Requestor:** A Tennessee Citizen seeking access to a public record, whether it is for inspection or duplication.

## **PROCESS:**

### **Requesting Access to Public Records**

- Public record requests shall be made to the Public Records Request Coordinator (PRRC), or their designee, in order to ensure public record requests are routed to the appropriate Records Custodian and fulfilled in a timely manner.
- Requests for “Inspection Only” cannot be required to be made in writing. The Public Records Request Coordinator should request a mailing or email address from the requestor for providing any written communication required or permitted under the TPRA.
- Requests for inspection may be made orally or in writing using the attached Form at the Williamson Health Office of the Public Records Request Coordinator located at 4321 Carothers Drive, Franklin, Tennessee 37067 or by phone at 615-435-5973.
- Requests for copies, or requests for inspection and copies, shall be made in writing using the attached Form at the Williamson Health Office of the Public Records Request Coordinator located at 4321 Carothers Drive, Franklin, Tennessee 37067 or by phone at 615-435-5973.
- Proof of Tennessee citizenship is required by presentation of a valid Tennessee driver’s license, or an alternative form of identification which is deemed acceptable, as a condition to inspect or receive copies of public records.

### **Responding to Public Records Requests: Duties of the Public Records Request Coordinator**

- The Public Records Request Coordinator shall review public record requests and make an initial determination of the following:
  - If the Requestor provided evidence of Tennessee citizenship;
  - Whether the records requested are described with sufficient specificity to identify them; and
  - Whether the records are Williamson Health records and, if so, what office is the custodian of the records.

- The Public Records Request Coordinator shall acknowledge receipt of the request and take any of the following appropriate action(s):
  - Advise the Requestor of this Policy and ask for proof of Tennessee citizenship (if not previously provided); and
  - If the Requester asks for copies, explain the form that needs to be completed and any fees, if not otherwise waived.
  
- If permitted under this Policy, the Records Custodian shall inform the Requester in writing that the request has been denied and an explanation of the reason why the request is denied, including any one of the following reasons:
  - The Requestor is not, or has not presented evidence of being, a Tennessee citizen.
  - The Requestor's description of the records is not specific enough to determine what records are being requested.
  - An exemption makes the record not subject to disclosure under the TPRA. (Provide the exemption in written denial).
  - The Governmental Entity is not the Records Custodian of the requested records.
  - The records do not exist.
  - If appropriate, contact the Requestor to see if the Public Records Request can be narrowed.
  - If known, forward the Public Records Request to the appropriate records Record Custodian.
  - If requested records are in the custody of a different governmental entity, and the Public Records Request Coordinator knows the correct governmental entity, advise the Requestor of the correct governmental entity and Public Records Request Coordinator for that entity, if known.

### **Designated Public Records Request Coordinator**

- The designated PRRC for Williamson Health is the Chief Compliance Officer.

### **Distributing Public Records Request to the Appropriate Records Custodian**

- Upon receiving a public records request, a Records Custodian shall promptly make requested public records available in accordance with Tenn. Code Ann. § 10-7-503. If the Records Custodian is uncertain that an applicable exemption applies, the Records Custodian may consult with the Public Records Request Coordinator, Legal Counsel, or the Tennessee Comptroller of the Treasury Office of Open Records Counsel (OORC).
  
- If not practicable to promptly provide requested records because additional time is necessary to determine whether the requested records exist; to search for, retrieve, or otherwise gain access to records; to determine whether the records are open; to redact records; or for other similar reasons, the Records Custodian shall send the Requestor a

completed Public Records Request Response Form which is attached as Form (based on the form developed by the OORC) within seven (7) business days from receipt of the request.

- If a Records Custodian denies a Public Record Request, they shall deny the request in writing using the Public Records Request Response Form.
- If a Records Custodian reasonably determines production of records should be segmented because the records request is for a large volume of records, or additional time is necessary to prepare the records for access, the Records Custodian shall use the Public Records Request Response Form to notify the Requestor that production of the records will be in segments and that a records production schedule will be provided as expeditiously as practicable. If appropriate, the Records Custodian should contact the Requestor to see if the request can be narrowed.
- If a Records Custodian discovers records responsive to a records request were omitted, the Records Custodian should contact the Requestor concerning the omission and produce the records as quickly as practicable.

### **Redacting Confidential or Information not Otherwise Subject to the Public Records Act**

- If a record contains confidential or information that is not open for public inspection, the Records Custodian shall prepare a redacted copy prior to providing access. If questions arise concerning redaction, the Records Custodian should coordinate with Counsel or other appropriate parties regarding review and redaction of records.
- Whenever a redacted record is provided, a Records Custodian should provide the Requestor with the basis for redaction. The basis given for redaction shall be general in nature and such that it does not disclose confidential information.

### **Inspection of Records**

- There shall be no charge for “Inspection Only” of open public records.
- Under reasonable circumstances, the Public Records Request Coordinator, or a Records Custodian, may require an appointment for inspection or inspection of records at an alternate location. The Records Custodian should schedule a time during regular business hours that is convenient for the Requestor.

### **Copies of Records**

- A Records Custodian shall promptly respond to a public record request for copies in the most economic and efficient manner practicable.

- Copies will be available for pickup at a location specified by the Records Custodian.
- Upon payment for postage, copies will be delivered to the requestor's home address by the United States Postal Service.
- Copies may be emailed if the records are in electronic format.
- A Requestor is not permitted to make copies of records with personal equipment or by removing the records to have them copied by a third party.

### **Procedures for Fees, Charges, Billing, and Payment**

- Fees and charges for copies of public records should not be used to hinder access to public records.
- A Records Custodian shall provide a Requestor with an itemized estimate of the charges using a form approved by the Williamson County Public Records Commission prior to producing copies of records, and may require pre-payment of such charges before producing requested records.
- When fees for copies and labor do not exceed \$1.00, the fees may be waived. Requests for waivers of any fees must be presented to the Public Records Request Coordinator who is authorized to determine if such waiver is in the best interest of Williamson Health and the public good. Fees associated with aggregated records requests shall not be waived.

### **Fees and Charges**

- **Copies:**
  - **Black and White Copies:** \$0.15 per page for letter- and legal-size.
  - **Color Copies:** \$0.50 per page for letter- and legal-size.
  - **Other Mediums:** A Public Records Request Custodian may charge higher fees for copies of documents that are on a medium other than 8½ x 11-inch paper or 8½ x 14-inch paper.
- **Labor:**
  - When the total time to fulfill a public records request exceeds one (1) hour, the Records Custodian may charge the Requester a labor fee after the Requester is notified of the labor charge.
  - In calculating the charge for labor, a Records Custodian shall determine the number of hours each employee spent producing a request.
  - The Records Custodian shall then subtract the 1-hour threshold from the number of hours the highest paid employee spent producing the request.

- The Records Custodian will then multiply the total number of hours to be charged for the labor of each employee by that employee's hourly wage.
- Finally, the Records Custodian will add together the totals for all the employees involved in the request and that will be the total amount of labor charged.
- **Vendor:**
  - If an outside vendor is used, the actual costs assessed by the vendor may be charged.
- **Payment:**
  - Payment is to be made by cash or personal check payable to Williamson County Government.
  - Payment will be required in advance when total costs exceed \$10.00.

### **Aggregation of Frequent and Multiple Requests**

- Williamson County will aggregate record requests in accordance with the *Frequent and Multiple Request Policy* promulgated by the Public Records Request Coordinator when more than four (4) requests are received within a calendar month either from a single individual or a group of individuals deemed working in concert.
- The Public Records Request Coordinator is responsible for making the determination that a group of individuals are working in concert. The Public Records Request Coordinator, or the Records Custodian, must inform the individuals that they have been deemed to be working in concert.

**WILLIAMSON HEALTH**  
**Public Records Request – Inspection or Duplication of Records Request**  
4321 Carothers Parkway · Franklin, Tennessee 37067  
(615) 435-5973

**Requester Instructions:**

- Complete Sections 1-5.
- **Do not sign and date** the signature line until the records are received by the Requester.

**Records Custodian Instructions:**

- For requests to inspect, the Records Custodian completes Sections 1-6 and 9.
- For requests for copies or duplicates, the Records Custodian completes Sections 6-9.
- **Do not sign and date** the signature line until the records are delivered to the requester.

**Note:** Tenn. Code Ann. § 10-7-503(a)(7)(A) provides that, unless another provision in law specifically requires a written request, a request to inspect public records may neither be required to be in writing, nor can a fee be assessed for “Inspection Only” of records.

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**REQUESTER COMPLETE SECTIONS 1-5:**

**Section 1:** Name of Requester: \_\_\_\_\_  
(Print or Type; Initials of requester are required for copy requests)

**Section 2:** Form of Identification Provided (if required):  
 Photo ID issued by governmental entity including requester’s address  
 Other: \_\_\_\_\_

**Section 3.** Requester’s Address and Contact Information:  
\_\_\_\_\_  
\_\_\_\_\_

**Section 4:** Request for:  
 Inspection / Access;  
 Copy / Duplication as previously inspected on \_\_\_\_\_ (date); or  
 Inspection waived

**Section 5:** Record(s) Requested:  
▪ Type of Record:  
○  Minutes  
○  Annual Report  
○  Annual Financial Statements  
○  Budget  
○  Employee File  
○  Other

- Detailed Description of the record(s) including relevant date(s) and subject matter:

\_\_\_\_\_

\_\_\_\_\_

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## RECORDS CUSTODIAN COMPLETE SECTIONS 6-9

**Section 6:** Request Submitted To: \_\_\_\_\_  
(Name of Governmental Entity, Office, or Agency)

- Employee Receiving Request: \_\_\_\_\_  
(Print or Type and Initial)
- Date and Time Request Received: \_\_\_\_\_
- Response:  Same Day  Other \_\_\_\_\_

### Section 7: Fees and Charges

- Number of Pages to be Copied: \_\_\_\_\_  Estimated  Actual
  - Cost(s):
    - Per page letter or legal sized:
      - \$\_\_\_\_\_ per black/white; justification required if more than \$0.15
      - \$\_\_\_\_\_ per color; justification required if more than \$0.50
    - Per page other sized or other medium
      - \$\_\_\_\_\_ (justification required)
- Estimate of labor costs to produce the copy (for time exceeding 1-hour):
  - Labor at \$\_\_\_\_\_ /hour for \_\_\_\_\_ hour(s)
  - Labor at \$\_\_\_\_\_ /hour for \_\_\_\_\_ hour(s)
    - Total Labor: \_\_\_\_\_
- Programming Cost to Extract Information Requested: \_\_\_\_\_
- Vendor(s): \_\_\_\_\_  Estimated  Actual
- Method of Delivery and Cost: \_\_\_\_\_  Estimated  Actual
  - On-Site (pick-up)
  - United States Postal Service (USPS)
  - Other: \_\_\_\_\_
- Estimate of Total Cost to Produce Request: \_\_\_\_\_
- Estimate Provided to Requester:
  - In person
  - Via United States Postal Service (USPS)
  - Via telephone
  - Other: \_\_\_\_\_

**Section 8: Payment:**

- Form of Payment:
  - Cash
  - Check
  - Other \_\_\_\_\_
- Payment Amount: \_\_\_\_\_
- Payment Date: \_\_\_\_\_
- Actual Cost (and adjustment if prepaid): \_\_\_\_\_

**Section 9: Release / Access Date(s):**

- Access to Records: \_\_\_\_\_
- Delivery of Copies: \_\_\_\_\_

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**SIGNATURES**

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Signature of Requester / Date

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Signature of Records Custodian / Date

*This form was approved by the Williamson Health Board of Trustees on July 27, 2017.*