

Policy Transmittal Aging and People with Disabilities



Erika Miller

Authorized signature

Number: APD-PT-23-001

Issue date: 1/9/2023

Topic: Licensing

Due date:

Transmitting (check the box that best applies):

- New policy
 Policy change
 Policy clarification
 Executive letter
 Administrative Rule
 Manual update
 Other:

Applies to (check all that apply):

- | | |
|--|--|
| <input type="checkbox"/> All DHS employees | <input type="checkbox"/> County Mental Health Directors |
| <input checked="" type="checkbox"/> Area Agencies on Aging: Type B | <input type="checkbox"/> Health Services |
| <input checked="" type="checkbox"/> Aging and People with Disabilities | <input checked="" type="checkbox"/> Office of Developmental Disabilities Services (ODDS) |
| <input type="checkbox"/> Self Sufficiency Programs | <input type="checkbox"/> ODDS Children’s Intensive In Home Services |
| <input type="checkbox"/> County DD program managers | <input type="checkbox"/> Stabilization and Crisis Unit (SACU) |
| <input type="checkbox"/> Support Service Brokerage Directors | <input type="checkbox"/> Other (please specify): |
| <input type="checkbox"/> ODDS Children’s Residential Services | |
| <input type="checkbox"/> Child Welfare Programs | |

Policy/rule title:	Deidentifying AFH licensing reports		
Policy/rule number(s):		Release number:	
Effective date:	1/9/2023	Expiration date:	
References:			
Web address:			

Discussion/interpretation: When writing licensing violations in APD and ODDS adult foster homes the licensors use a resident key/ person code sheet to support resident privacy in what are ultimately public documents. This privacy is potentially compromised when using gender specific pronouns as those identifiers could be used to support guesses as to whom the author is speaking of.

Implementation/transition instructions: When licensors are writing violations and narratives, they should use they/ them pronouns in all cases as opposed to utilizing gender specific he/ him or she/ her pronouns. This extra step will further aid in protecting resident privacy. Licensors may also use the resident’s number from the

resident key/ person code sheet as an identifier without being gender specific.

Example: R1 (resident 1) requires assistance with mobility, or **they** require assistance with mobility instead of **she** requires assistance with mobility.

Training/communication plan: Review of this policy transmittal as needed.

Local/branch action required: Begin to use gender neutral language when writing licensing violations and narratives.

Central office action required: Technical assistance will be provided as needed.

Field/stakeholder review: Yes No

If yes, reviewed by: APD and ODDS Policy

Filing instructions:

If you have any questions about this policy, contact:

Contact(s): APD AFH Policy Team and ODDS	
Phone:	Fax:
Email: APD.AFHteam@odhsoha.oregon.gov for APD questions	