



## PUBLIC-INTEREST FIELD GUIDE

# PUBLIC RIGHTS FIELD GUIDE

## Records Access & Corrections

Classify the record · Read the rule · Keep the request trail



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**CORE PRINCIPLE**

Public record does not always mean public release. Identify the record, the holder, the requester and the process before attaching a legal label or a deadline.

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Choose a button · Underlined labels and page arrows are also links

**FERPA · HIPAA · IPRA · FOIA · PRIVACY ACT**

September 19, 2026 · Review candidate, not an approved public release

# Find the record. Choose the process.

The contents, page numbers, outlined rows and underlined citations are clickable.

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### REVIEW CANDIDATE · NOT AN APPROVED PUBLIC EDITION

v1.0-rc1 develops a bounded records workflow. It does not decide a personal entitlement, calculate a filing date or provide representation. Read source-version warnings and the release review at the end.

# One record; several different questions

Start with the actual copy and its holder—not only a logo, filename or institutional label.

## IDENTIFY THE COPY

What exists: email, notes, chart, video, report, database entry, attachment, audit log or later summary? Who created it, who maintains it, and for what purpose? Record dates, systems and likely custodians without assuming every requested item exists.

## IDENTIFY THE REQUESTER

Are you the eligible student, parent with current rights, patient, authorized representative, member of the public or a party using litigation procedures? Personal access and public disclosure are not the same task.

## IDENTIFY THE PROCESS

Access asks to inspect or obtain records. Amendment challenges specified information. A disclosure record/accounting addresses covered disclosures. A grievance challenges conduct or process. A merits appeal challenges a decision. Preservation asks that material remain available.

### SAME INFORMATION; DIFFERENT COPIES

An outside provider's chart and a copy maintained by a school can be governed differently. A school's public status does not make every student record open; a private institution's receipt of relevant education funding does not by itself make it a state public body.

Begin with [FERPA coverage](#), [HIPAA coverage](#), [IPRA classification](#) or [federal personal records](#). Do not use one request label to silently override another law's conditions.

## KEEP BOTH TRACKS VISIBLE

A request for records is not a substitute for an urgent safety response, substantive appeal, litigation deadline or case-specific preservation assessment. A particular law may nevertheless impose a records-specific preservation rule: see [FERPA's pending-request rule](#).

# FERPA education records

The legal definition is broader than a transcript—and narrower than every item a school possesses.

## TWO CENTRAL CONDITIONS

The record must be directly related to a student and maintained by the covered educational agency/institution or a party acting for it. FERPA applies to covered education institutions; the requester's age, attendance and rights transfer matter. See [20 U.S.C. § 1232g and 34 C.F.R. Part 99](#).

## DO NOT ASSUME A FORMAT EXCLUSION

Email, electronic files, audio/video and other media can qualify when the definition is met. Conversely, merely mentioning a student does not settle the complete record-classification analysis.

## EXCLUSIONS REQUIRE THEIR OWN FACTS

Genuinely sole-possession memory aids, specified employment records, law-enforcement-unit records and qualifying treatment records have distinct conditions. Student employment that exists because the person is a student is treated differently from ordinary employee-only records.

## WHO CAN USE THE RIGHT?

Rights generally transfer when the student turns 18 or attends a postsecondary institution, regardless of age. The definition of student includes a person who is or has been in attendance. A former student can still have rights in retained education records; this does not require creation or indefinite retention of every possible record.

### A USEFUL START

Ask for the institution's annual FERPA notice, access procedure and office responsible for the specified records. Identify actual categories, time periods and known locations. Use [the education-access template](#), not a blanket public-disclosure demand.

Relevant source text: [definition and rights](#) · [inspection/copying limits](#) · [consent, disclosure record and complaints](#).

# FERPA treatment records

“Treatment record” is a specific exclusion—not a label that fits every student’s clinical information.

## CHECK ALL CONDITIONS

For the specified older/postsecondary student, the records must be made or maintained by a physician, psychiatrist, psychologist or other recognized professional/paraprofessional acting in that capacity; made, maintained or used only for treatment; and disclosed only to treatment providers. The definition excludes remedial education and instructional-program activities from treatment. [Read the actual rule.](#)

## PROFESSIONAL REVIEW IS A DISTINCT ROUTE

Under § 99.10(f), an institution need not provide ordinary FERPA access to qualifying treatment records. The student may have them reviewed by a physician or other appropriate professional of the student’s choice. Ask for the procedure and any separate policy or law that provides direct copies.

## A DIFFERENT USE CAN CHANGE THE CLASSIFICATION

HHS guidance explains that disclosure for a non-treatment purpose can bring the records under FERPA education-record rules. Such disclosure may be permissible under consent or another FERPA exception; it is not automatically unlawful. Reclassification does not make the records publicly available.

### NOT AN AUTOMATIC HIPAA FALLBACK

HIPAA’s PHI definition excludes both FERPA-covered education records and the specified FERPA treatment records. “FERPA inspection does not apply” is therefore not enough to establish HIPAA access. See [the definition boundary](#).

Use [the classification/professional-review request](#). It asks for the applicable process without claiming a universal direct-copy or 45-day treatment-record right.

# Public record is not public release

A confidentiality restriction can limit disclosure without removing the record from a public-record definition.

## CLASSIFICATION

The IPRA text reproduced in NMDNJ's 2025 guide defines public records broadly by public-body custody/creation/maintenance and relation to public business. On that definition, a public institution's student record can qualify as a public record while its protected contents are not publicly inspectable. This is a classification analysis—not a ruling on a particular file. [Read the definition and source limitation.](#)

## DISCLOSURE

FERPA restricts disclosure of personally identifiable information from education records, with consent and specified exceptions. IPRA exceptions and segregation must also be examined. A member of the public does not acquire the eligible student's personal access right simply by invoking IPRA.

## PERSONAL ACCESS

The student can use the appropriate FERPA access route for education records even when a stranger could not receive them. Qualifying treatment records have their separate professional-review route. The recipient and purpose matter as well as the content.

### EXEMPT IS NOT THE SAME AS NONEXISTENT

“Not publicly releasable” does not establish that a record never existed, may be destroyed, is outside all lawful access, or has no evidentiary significance. Nor does an IPRA definition automatically establish the elements of a public-record-tampering offense.

Request an identified legal basis for withholding and releasable segregable portions where the governing process provides them. De-identification is not merely deleting names: FERPA's standard also addresses whether a student could reasonably be identified from remaining information. [See §§ 99.31–32.](#)

### NEW MEXICO CURRENTNESS

The current official codified IPRA text and controlling current treatment remain an open release gate. The guide visibly identifies its March 2025 statutory reproduction rather than presenting it as fresh codification.

# Inspect, review, interpret, copy

Make a precise request and preserve the exact version received by the institution.

## THE ACCESS PERIOD

For covered education records, § 99.10 requires access within a reasonable period, no more than 45 days after receipt. That is not a universal wait of 45 days and is not the FERPA amendment or treatment-record clock. [Authority and limits.](#)

## COPIES AND PRACTICAL BARRIERS

An electronic copy can be requested. FERPA does not create a universal right to one preferred export format. If circumstances effectively prevent inspection/review, the institution must provide a copy or make other arrangements. Describe the actual barrier rather than asserting an invented entitlement.

## WHAT ELSE CAN BE ASKED?

Reasonable explanations and interpretations; the education records in identified systems; and the disclosure record required by § 99.32, where applicable. Search and retrieval fees are not permitted under § 99.11; copying fees have separate limits. Mixed-student records require attention to the information directly related to the requester.

### IMPORTANT PRESERVATION QUALIFICATION

Section 99.10(e) prohibits destruction of education records while a request to inspect and review them under that section is outstanding. This corrects any overbroad suggestion that an access request never affects preservation. It does not create a blanket hold over every file or pause an outside claim.

The [access template](#) distinguishes required access from preferred electronic delivery. Record receipt, clarification, offered inspection arrangements, files received and any missing categories. Keep both the request and the response.

# HIPAA: more than the patient portal

Identify the covered entity and designated record set before asking what format or amendment is available.

## DESIGNATED RECORD SET

The definition includes specified medical/billing records, health-plan enrollment/payment/claims/case-management systems, and records used in whole or part to make decisions about individuals. It can include records maintained for the entity. A portal or short visit summary need not exhaust the relevant set. [Read § 164.501.](#)

## PSYCHOTHERAPY NOTES ARE NARROWER THAN MENTAL-HEALTH RECORDS

The HIPAA definition concerns separately maintained notes analyzing counseling conversations. It excludes medication information, test results and specified summaries such as diagnosis, treatment plan and progress. “A therapist wrote it” is not the test. This is distinct from FERPA’s treatment-record exclusion.

## ACCESS AND FORMAT

Section 164.524 generally requires action within 30 days of receipt, with one qualifying extension up to 30 days. It addresses requested readily producible electronic format or an agreed readable electronic alternative, and limited reasonable cost-based copying charges. [Read the rule and denial conditions.](#)

### AVOID A THIRD-PARTY DIRECTIVE BY ACCIDENT

The template requests a copy to the individual through a verified delivery method. It does not automatically authorize disclosure to a new app, reporter, employer or other third party. Choose the recipient intentionally; specialized third-party transmission rules may differ.

Use [the HIPAA access template](#). Ask for remaining accessible records and a written reason if access is denied in part. Some denial grounds provide independent professional review; not every denial does.

# Correct an education record

Identify the precise information, why it is inaccurate or misleading, and the correction requested.

## STEP 1 · ASK FOR A SPECIFIC AMENDMENT

Under §§ 99.20–22, the institution decides within a reasonable time whether to amend information alleged inaccurate, misleading or in violation of privacy rights. State the record/date/page/field, present wording, proposed correction and supporting source. [Use the amendment request.](#)

## STEP 2 · USE THE ACTUAL HEARING PROCESS

If the institution refuses, it must inform the requester of the hearing right. A hearing must be within a reasonable time and satisfy the rule's notice, impartiality, evidence and written-decision requirements. A school official may serve if the person lacks a direct interest in the outcome. [Request the hearing.](#)

## STEP 3 · PRESERVE DISAGREEMENT AFTER THE HEARING

After an adverse hearing result, the eligible student/parent can place a statement commenting on the contested information or explaining disagreement. The institution must maintain it with the contested portion while that portion is maintained and disclose it with that portion. [Use the statement template.](#)

### NOT AN APPEAL OF EVERYTHING IN THE FILE

The Education Department distinguishes amendment from challenges to substantive judgments such as grades or disciplinary decisions. A factual recording error and disagreement with a decision are different issues. An amendment request should not replace or delay a separate merits appeal.

The access period of 45 days is not an automatic amendment/hearing deadline. [Read the amendment/hearing authority](#) and record any actual institutional procedure, deadline and decision notice.

# Correct a health record

A disagreement can be documented without silently replacing the original chart.

## ACTION AND EXTENSION

HIPAA § 164.526 requires action within 60 days of receipt, with one extension of no more than 30 days if timely written reasons and a completion date are supplied. The entity may require a written request and reason if it informs individuals of those requirements in advance. [Read the authority.](#)

## IF ACCEPTED

The entity identifies the affected record and appends or links the amendment, informs the individual, and addresses required notification to relevant recipients. Ask which records were affected and identify recipients who need the correction. This is not a guarantee that every independent recipient's historical file disappears.

## IF DENIED

The notice must explain the applicable basis and disagreement/complaint process. Grounds include originator with an unavailability qualification, record-set/access scope and accuracy/completeness. A disagreement statement can be reasonably length-limited; an entity rebuttal must be supplied to the individual.

## FUTURE DISCLOSURES

The rule requires linkage of the relevant amendment dispute material. With a disagreement statement, later disclosure of the disputed information must include the linked material or an accurate summary. Without a disagreement statement, the individual may request that the amendment request/denial or an accurate summary accompany later disclosure.

### CHOOSE THE CORRECTION YOU CAN SUPPORT

Separate incorrect date, wrong attribution, missing context and disagreement with a clinical judgment. "The chart reports that X was said" is not always the same proposition as "X is true." Do not demand deletion of history as the default remedy.

[Amendment template](#) · [Disagreement / alternative request](#) · [Full regulation and limits](#).

# Disclosure lists, audit logs and versions

These are different records. Ask for the one you actually need.

## FERPA DISCLOSURE RECORD

Section 99.32 generally requires a record of specified requests for access and disclosures of personally identifiable information, subject to exceptions. Disclosures to the parent/eligible student, qualifying school officials, with written consent and certain other categories can be excluded. It is not a universal list of every employee who opened a file. [Read the scope.](#)

## HIPAA ACCOUNTING

Section 164.528 covers specified disclosures within the six-year lookback, with significant exclusions—including treatment/payment/operations and authorized disclosures. Action is due within 60 days, with one qualifying extension up to 30 days. The first accounting within 12 months is free. [Read the conditions.](#) The lookback is not a universal medical-record retention rule.

## ACCESS / AUDIT / AMENDMENT HISTORY

System access logs, EHR audit trails, version histories, correction approvals and record-routing logs may exist. Request identified existing records through the applicable access process and ask the holder to explain scope or withholding. Neither FERPA's disclosure record nor HIPAA's accounting automatically grants every internal log.

### A MISSING LOG ENTRY DOES NOT PROVE NO EVENT

An omission can reflect the log's scope, an exclusion, a different system, retention or an error. Compare actual sources before drawing conclusions. A missing production does not by itself establish tampering, unauthorized access or a false record.

Use [the HIPAA accounting template](#) for that specific right, and [the clarification template](#) for an unexplained production gap. Keep the precise request, dates, returned filenames and stated exceptions.

# Public access: IPRA and FOIA

Ask for existing records, not a newly created answer to every question.

## NEW MEXICO IPRA

Use the public body's records custodian. The reproduced Act identifies name, address, telephone number and reasonably particular records for a written request; email and fax count as writing. Requested existing electronic records are addressed in the format in which they exist, subject to lawful withholding/segregation. [Authority and source-version gate.](#)

## MAKE THE SCOPE SEARCHABLE

Give a date range, event identifier, record types and likely systems/custodians. Instead of "Why did they do this?", identify existing emails, notes, policies, approvals or audit entries that may document the basis. Avoid bundling unrelated personal medical or student information into a public request.

## FEDERAL FOIA

Use the correct federal agency/component and its published rules. Reasonably describe existing agency records and request the desired readily reproducible format. Fees, identity verification for personal information, exemptions and segregation require separate attention. [Read § 552.](#)

### A REQUEST IS NOT A UNIVERSAL ORDER

IPRA and FOIA are not general amendment statutes, subpoenas or universal litigation holds. Ask for an appropriate correction process separately. Do not assume either law reaches an institution merely because it receives public funds.

[IPRA template](#) · [FOIA template](#) · [Response and appeal clocks](#). The NMDOJ guide's current-codification limitation remains visible in both the template notes and authority card.

# Federal records about you

The Privacy Act can add a separate pathway; it is not interchangeable with FOIA or HIPAA.

## COVERAGE FIRST

The basic statutory individual definition covers U.S. citizens and lawful permanent residents. A system of records has a personal-identifier retrieval criterion. Check the agency, system notice, exemptions, eligibility and any other applicable law. Do not conclude a person has no possible access simply because one Privacy Act route does not fit. [Read § 552a.](#)

## ACCESS AND AMENDMENT ARE SEPARATE REQUESTS

Identify the system and existing record as well as possible dates and identifiers. Use the agency's accepted verification method rather than emailing identity documents to an unverified address. Where applicable, ask the agency to consider both FOIA and Privacy Act access, without pretending both necessarily govern.

## THE AMENDMENT CLOCK IS NOT A TEN-DAY DECISION

Section 552a(d)(2) requires amendment-request acknowledgment within ten working days and a prompt amendment or refusal. Review of a refusal normally must be completed within thirty working days of the review request, subject to the agency-head good-cause extension. The statute does not supply a universal initial-access thirty-day deadline.

## FOLLOW THE NOTICE

Check the agency's actual review process, deadline, signature and proof-of-identity requirements. Disagreement notation, later disclosure and judicial review have additional provisions. A generic follow-up is not necessarily an administrative appeal.

[Federal personal-record access](#) · [Privacy Act amendment request](#). The source card identifies the GovInfo Code retrieval without claiming a verified amendment-through date.

# Other record rules can matter

Do not force a specialized record into the closest familiar acronym.

## IDEA SPECIAL-EDUCATION RECORDS

For covered Part B records, § 300.613 requires access without unnecessary delay, before specified IEP meetings/hearings/resolution sessions and in no case more than 45 days after the request. Check the actual child/parent/agency context and applicable rights transfer; this is not every postsecondary student's rule. [Read the source.](#)

## SUBSTANCE-USE-DISORDER RECORDS

42 C.F.R. Part 2 applies to specified programs and records—not every reference to a substance use disorder. Section 2.23 does not prohibit giving a patient access to their own records. Other law supplies any applicable access entitlement, timing or amendment process.

### A 2026 COMPLIANCE DATE NEEDS ITS QUALIFICATIONS

HHS identifies February 16, 2026 as the general compliance date for the 2024 Part 2 rule. Its updated fact sheet expressly qualifies when the new accounting right requires compliance. Do not treat all provisions as having the same operative date. [Read the version note.](#)

## INFORMATION BLOCKING

ONC identifies separate actor, practice, knowledge and exception questions for electronic health information. A missing record or unfulfilled format request is not automatically information blocking; failure to satisfy an exception alone is not enough. See [the official gateway](#).

## COURTS AND OTHER SPECIAL SYSTEMS

Federal FOIA does not govern federal courts. Court-case files, sealed/protected material and court administrative records need the correct clerk/rule route. Employment/personnel, vital records, juvenile, tribal and other specialized systems may have additional rules beyond this guide.

[WEB · ONC — Information blocking and complaint gateway](#)

[WEB · New Mexico Courts — Records requests](#)

# Different clocks; different jobs

This guide gives process rules to check—not an individualized due-date calculator.

|                                                                                                  |                   |
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| <b>Health records</b><br>Access, amendment/accounting and HIPAA complaint.                       | <b>p. 17</b><br>→ |
| <b>Public and federal personal records</b><br>IPRA, FOIA and Privacy Act periods and exceptions. | <b>p. 18</b><br>→ |

**NAME THE EVENT**

Record request sent, proper recipient’s receipt, request for clarification, decision received, hearing requested, production and referral separately. The date a draft was created is not necessarily the operative receipt date.

**NAME THE PERIOD**

Calendar days, working days, reasonable time, a published average and an appeal window are different. An agency’s investigation estimate does not extend a requester’s filing period.

**DO NOT WAIT FOR ONE TRACK TO FINISH**

Access, preservation, care/safety, disability access, administrative appeals and court claims can run in parallel. Verify a prerequisite or tolling rule; do not invent one. A records request or complaint alone does not establish that an outside deadline has stopped.

The companion Reporting Atlas contains dated agency waiting estimates. Those are not substituted for the legal response periods here. Machine-readable clock records preserve actor, trigger, units, extension conditions and source IDs.

# School-record clocks

Read the source and identify the requested action before attaching a number.

## ACCESS · REASONABLE TIME, NO MORE THAN 45 DAYS

For education-record inspection/review under § 99.10, count from receipt. Record any actual offered access and practical barriers. This is not the ordinary treatment-record professional-review clock. [Rule and pending-request preservation.](#)

## AMENDMENT / HEARING · REASONABLE TIME

Section 99.20 uses a reasonable-time amendment decision. Sections 99.21–22 address the hearing and written decision within reasonable periods. No universal 45-day amendment/hearing number is supplied. Record the actual procedure and seek timely clarification. [Read the hearing conditions.](#)

## FERPA COMPLAINT · 180 DAYS WITH THE CORRECT TRIGGER

Under § 99.64, the period runs from the alleged violation or when the complainant knew or reasonably should have known of it; SPPO may extend for good cause. This is a filing period, not SPPO's time to resolve a case. Check the official complaint instructions promptly. [Read the rule and route.](#)

### SHORTER OR DIFFERENT PROCESSES

A substantive school appeal can have a separate period. IDEA access can be needed before a specified meeting even though the outside rule mentions 45 days. Do not delay a merits appeal, urgent support request or appropriate complaint while polishing a records request.

Unknown dates stay unknown in the log. Keep requests, denial notices, hearing requests, statements and replies as separate versions, with proof of the accepted submission method.

# Health-record clocks

Covered-entity action periods are not OCR investigation estimates.

## ACCESS · 30 DAYS; ONE QUALIFYING EXTENSION UP TO 30

Section 164.524 runs from receipt. For an extension, the entity must give written reasons and the completion date within the initial period. The ordinary maximum does not mean every other applicable rule permits avoidable delay. [Access source.](#)

## AMENDMENT · 60 DAYS; ONE QUALIFYING EXTENSION UP TO 30

Section 164.526 uses a separate action period and timely written-extension conditions. Later recipient notifications involve additional reasonable-efforts/reasonable-time requirements. [Amendment source.](#)

## ACCOUNTING · 60 DAYS; ONE QUALIFYING EXTENSION UP TO 30

Section 164.528 addresses covered disclosures, not every file view. Check exclusions and any authorized suspension rather than assuming an incomplete list proves wrongdoing. [Accounting source.](#)

## HIPAA COMPLAINT · 180 DAYS FROM KNOWLEDGE

Section 160.306 uses when the complainant knew or should have known of the act/omission; the Secretary may waive the period for good cause. It is not 180 days from completion of every internal process, and it is not a promised OCR decision date.

[WEB · HIPAA complaints — 45 C.F.R. § 160.306](#)

### OTHER RECORDS / OTHER LAW

Do not transplant these periods into FERPA treatment records, Part 2, every state-law medical request or a third-party legal demand. Confirm which rule applies to the actual record and requester.

# Public-record and Privacy Act clocks

A determination, an acknowledgment and completed production are different events.

## IPRA · PROMPT INSPECTION; 3 BUSINESS / 15 CALENDAR DAYS

The reproduced Act calls for inspection as soon as practicable, with written advice within 3 business days when inspection is not permitted within that period. The general 15-calendar-day outside inspection period has an excessively-broad/burdensome-request provision allowing a reasonable additional period with notice within 15 days. It is not an unconditional “all files by day 15” guarantee. [Current-codification gate and actual text.](#)

## FOIA · ORDINARY 20-WORKING-DAY DETERMINATION

The proper-component receipt/routing rule, permitted tolling and unusual-circumstances extension provisions matter. A determination is not necessarily completed production. The adverse-decision appeal window must be at least 90 days; the ordinary appeal-determination rule is 20 working days, subject to applicable provisions. Expedited-processing decisions have a separate 10-day rule. [Read § 552.](#)

## PRIVACY ACT · TEN-DAY ACKNOWLEDGMENT IS NOT A DECISION

Amendment acknowledgment: 10 working days, excluding Saturdays, Sundays and legal public holidays. Action must be prompt. Review of amendment refusal: normally 30 working days from the review request, with an agency-head good-cause extension. Check agency-specific initial-access rules. [Read § 552a\(d\).](#)

### WHEN A NOTICE ARRIVES

Save the exact notice and its delivery date. Use the specified appeal method, address and deadline rather than assuming a clarification request or ombudsman contact counts as an appeal. Seek qualified help promptly when a deadline or legal remedy is at stake.

# Use electronic requests deliberately

An accepted electronic route can make exact versions and receipt evidence easier to keep. Paper and accessible alternatives remain valid options where available.

## USE THE OFFICIAL ACCEPTED ROUTE

Verify the office, portal or published address and any required form/signature/identity step. Request accessible electronic delivery where suitable, but do not assume every office must accept the same format or that every transmission is secure.

## SAVE THE ACTUAL SUBMISSION

Retain the final message, native email with headers when available, attachments, portal export/confirmation, timestamp and time zone, reference number and any bounce or error. A screenshot supplements rather than replaces the original message or file when that original exists.

## KEEP PRODUCTION IN LAYERS

Store the received file unchanged, record its source/acquisition time and work on a copy. Preserve original filenames in the index even when creating descriptive working filenames. A checksum can help detect byte changes; it does not prove factual truth, lawful receipt or when a file was created.

### ELECTRONIC IS NOT AUTOMATICALLY PRIVATE OR PRIVILEGED

Do not place a private chart or identity document into a public records portal merely because it accepts uploads. Check who may see requests and attachments. A “confidential” subject line, account privacy setting or copied lawyer does not itself create privilege. Do not send sensitive material to AI merely to format a request.

Use [the electronic receipt/production log](#) and [bounded follow-up language](#). These are organization practices—not a legal conclusion about service, authentication, spoliation or disclosure obligations.

# When access or correction stalls

Choose by the issue and the office's actual role—not by an assumed escalation ladder.

## FERPA · SCHOOL PROCESS + SPPO

Begin with the office that holds the education records; use the amendment/hearing process when that is the issue. SPPO receives FERPA complaints through its current form and published route. Its page encourages school resolution but does not require it for every FERPA complaint. Do not confuse SPPO with Education OCR discrimination intake. [Law and complaint clock.](#)

[WEB · Student Privacy Policy Office — File a complaint](#)

## HIPAA · HOLDER + HHS OCR

Use the covered entity's access/amendment/privacy process. HHS OCR's complaint gateway addresses possible HIPAA noncompliance; it is not the office that ordinarily supplies a provider's chart. Keep a 180-day knowledge-trigger complaint question separate from the entity's action period.

[WEB · HHS — Filing a health information privacy complaint](#)

[WEB · HIPAA complaints — 45 C.F.R. § 160.306](#)

## IPRA · CUSTODIAN + AVAILABLE ENFORCEMENT

Request the stated reason for withholding and segregable portions; preserve the request and response. NMDOJ provides an enforcement/complaint gateway. Its reproduced Act also addresses court enforcement without an administrative-exhaustion requirement; current procedural/remedy advice requires separate verification. [Read the source gate.](#)

[WEB · NMDOJ — Inspection of Public Records Act](#)

### WHILE WAITING

Check receipt, scope and missing required information; keep independent deadlines and safety/care needs active. A referral does not prove acceptance at the receiving office. No resolution-time promise for these offices is supplied here.

# Federal, health-IT and court gateways

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Other routes may address a different part of the same difficulty.

## FOIA · AGENCY APPEAL AND OGIS

Use the agency's FOIA Public Liaison and actual administrative appeal instructions. OGIS offers neutral federal FOIA dispute assistance; it is not a state-records appeal office or the requester's lawyer. Do not presume OGIS contact pauses a deadline. [Read the FOIA card.](#)

[WEB · FOIA.gov — How to make a FOIA request](#)

[WEB · OGIS — Request assistance](#)

## PRIVACY ACT · THE AGENCY'S RECORD-SYSTEM PROCESS

Find the agency privacy/records office and its system-specific access/amendment/review instructions. The generic Privacy Act label does not identify a single universal appeal form or initial-access deadline. [Read the governing text.](#)

## INFORMATION BLOCKING · ONC GATEWAY / HHS OIG ROLE

The official page links the claim portal and explains ONC certification review and HHS OIG's investigative authority. Actual actor, knowledge, practice and exceptions matter. The route is not automatic compensation or proof that a delayed record is unlawful.

[WEB · ONC — Information blocking and complaint gateway](#)

## COURT RECORDS · THE RIGHT COURT AND CLERK

The NM Courts gateway distinguishes requests for court-case material from court administrative records. Ask the proper clerk about access, copies, sealing, correction and any case-specific rule. An IPRA request is not a motion to amend a judicial ruling.

[WEB · New Mexico Courts — Records requests](#)

Use the Reporting Atlas for wider professional, facility, employment, police and consumer routes. Keep the records question distinct from discipline, compensation and substantive decision review.

# Read a denial without guessing

Ask what the response actually decides—and what it leaves open.

## NO RECORDS / NOT HELD / NOT FOUND

Those are different from withheld or redacted. Compare your scope with the search described. Ask for clarification and the proper holder if known; request existing search/transfer/disposition records where appropriate, without claiming a universal right to newly written explanations.

## PARTIAL PRODUCTION

List the missing categories by request item number, dates and filenames. Note that another student/person's information, a legal exception or a format issue can require separate treatment. Ask for the actual basis and any available segregable portion or alternate access method.

## AMENDMENT REFUSAL

Compare the specific ground with the applicable framework. FERPA's hearing/statement sequence differs from HIPAA's written disagreement and rebuttal process. A refusal to amend does not itself mean the underlying information is correct.

## AN APPEAL IS ITS OWN ACTION

A polite follow-up may not preserve a statutory or agency appeal. Use the actual notice and procedure; the [FOIA appeal template](#) is only a starting structure. Other regimes need their own appeal or review language.

Keep the original request, notice, submission method, tracking number, files and later corrections. Report a new event as a new event rather than silently rewriting the first account. A gap or inconsistency is a question to investigate, not proof of motive.

See [the clarification template](#), [the separate clocks](#) and [the records complaint gateways](#).

# Working templates: choose the right one

Each template body is generated from the same JSON record and exported as a separate TXT file.

|                                                                                                                                                    |                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| <b>01 · Education-record access</b><br>Eligible student or parent with current FERPA rights; identify the actual institution and records.          | <b>p. 25</b><br>→ |
| <b>02 · Treatment classification / professional review</b><br>Ask how the institution classifies identified student clinical records.              | <b>p. 26</b><br>→ |
| <b>03 · FERPA amendment request</b><br>Challenge identified information—not a whole narrative through a vague demand.                              | <b>p. 27</b><br>→ |
| <b>04 · FERPA amendment-hearing request</b><br>Use after the institution refuses the identified amendment request.                                 | <b>p. 28</b><br>→ |
| <b>05 · FERPA statement after adverse hearing</b><br>Use after the amendment hearing leaves the contested information unchanged.                   | <b>p. 29</b><br>→ |
| <b>06 · HIPAA access to designated records</b><br>Request your own PHI from a covered entity through its accepted identity/representative process. | <b>p. 30</b><br>→ |
| <b>07 · HIPAA amendment request</b><br>Identify the specific designated-record-set information and the reason for correction.                      | <b>p. 31</b><br>→ |
| <b>08 · HIPAA disagreement / disclosure request</b><br>Choose one alternative after an amendment denial; remove the other before sending.          | <b>p. 32</b><br>→ |

[Continue to accounting, public records, appeals and the electronic log.](#)

**BEFORE SENDING**

Read the use/limits note, replace every placeholder, remove alternatives that do not apply, verify recipient/identity requirements and retain the final body and attachments. These are not official forms or personalized legal advice.

# More templates and the evidence trail

The notes above a template are part of using it safely; copy only the body.

**09 · HIPAA accounting of disclosures**

Request the statutory accounting for a defined period, not every internal access event.

p. 33  
→

**10 · New Mexico IPRA request**

Identify existing public-body records; verify current codification and official custodian instructions.

p. 34  
→

**11 · Federal FOIA request**

Use the agency/component's accepted FOIA route and fee/identity instructions.

p. 35  
→

**12 · FOIA administrative appeal**

Use the actual adverse determination and agency appeal rules.

p. 36  
→

**13 · Federal personal-record access**

Check Privacy Act eligibility, system of records, exemptions and agency verification procedures.

p. 37  
→

**14 · Privacy Act amendment request**

Use the federal agency's amendment process for a covered record.

p. 38  
→

**15 · Receipt / scope / production clarification**

Ask a bounded follow-up about an identified prior request.

p. 39  
→

**16 · Electronic request / production log**

Private recordkeeping; use one entry per submission, notice or production.

p. 40  
→

The legal rules are linked to [internal authority cards](#). The cards identify actual text, source versions, qualifications and external full-text links.

# 01 · Education-record access

Eligible student or parent with current FERPA rights; identify the actual institution and records.

## CHECK BEFORE COPYING

Direct copies/electronic format are requests, not an automatic FERPA entitlement. Do not use this for another adult's records without authority.

Subject: FERPA education-record access request — [name / identifier]

To [verified institution records office]:

I am requesting access to inspect and review my education records under FERPA and 34 C.F.R. § 99.10.

My identifying information for your accepted verification process is [appropriate details].

Records requested: [specific categories, dates, offices/systems and known identifiers]. Please include the disclosure record required by § 99.32 where applicable.

I prefer a secure, readable electronic copy. [Describe an actual circumstance that would effectively prevent inspection, if relevant.] If this format is unavailable, please explain the available inspection/copying arrangements and any permitted fee before it is incurred.

Please respond to these reasonable requests for explanation or interpretation: [specific questions tied to the records].

Please confirm receipt and the responsible office. While this access request is outstanding, please preserve the education records subject to it as required by § 99.10(e). This is not a request for public release of my information.

[Name / date / safe reply route / required signature]

Source / limits: [RA01](#) · [RA03](#) · [RA05](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

## 02 · Treatment classification / professional review

Ask how the institution classifies identified student clinical records.

### CHECK BEFORE COPYING

Do not assert that all clinical records are education records, or that HIPAA and a 45-day direct-copy rule automatically apply.

Subject: Classification and review of identified student clinical records

To [verified clinic / records office]:

Please identify the procedure applicable to [records, dates and providers]. Are you treating these as FERPA education records, qualifying FERPA treatment records, HIPAA records, or another category?

Please identify the basis and the office responsible.

If these are qualifying treatment records under 34 C.F.R. § 99.3, I request the professional-review arrangement described in § 99.10(f). My chosen physician or other appropriate professional is [name, role and verified contact], subject to confirmation of the required process.

Please explain any verification, consent, appointment or secure transmission steps. Please also identify any policy or other applicable process through which I may request my own copy.

For any portion you maintain as an education record, please identify the applicable FERPA access process. This request does not authorize public disclosure or unrelated third-party sharing.

[Name / date / safe reply route]

Source / limits: [RA02](#) · [RA06](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

## 03 · FERPA amendment request

Challenge identified information—not a whole narrative through a vague demand.

### CHECK BEFORE COPYING

Not a merits appeal of a grade or disciplinary decision and not a demand to erase the original history.

Subject: FERPA amendment request — [record identifier]

To [verified institution office]:

I request amendment under 34 C.F.R. § 99.20 of the following information in my education record:

Record/date/page or field: [locator].

Current wording: [exact text or clearly identified description].

Requested correction: [specific replacement, attribution or clarification].

Reason: [why it is inaccurate, misleading or violates privacy rights]. Supporting material: [limited relevant source/attachment IDs].

Please decide this request within the applicable reasonable period and inform me in writing of the result. If you refuse the requested amendment, please provide notice of the hearing right and the procedure for requesting it under §§ 99.21–99.22.

Please confirm receipt and retain the request with its attachments according to the applicable process. This request is separate from any substantive appeal, which I am not withdrawing by this message.

[Name / date / safe reply route / required signature]

Source / limits: [RA04](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 04 · FERPA amendment-hearing request

Use after the institution refuses the identified amendment request.

### CHECK BEFORE COPYING

Follow the actual hearing procedure and any applicable notice requirements. This is not a request to retry every school decision.

Subject: FERPA amendment hearing — [record / decision identifier]

To [verified hearing-request office]:

I request a hearing under 34 C.F.R. §§ 99.21–99.22 concerning refusal of my amendment request dated [date], decided on [date].

The contested record and information are [precise locator]. I contend that [identified information] is [inaccurate / misleading / in violation of privacy rights] because [concise reason]. The correction requested is [specific correction].

Please provide the hearing procedure, date/time/place, applicable submission requirements and notice of how I may present relevant evidence and be assisted or represented at my own expense.

My communication/access needs for participation are [functional needs, if any]. Please identify how those requests will be handled; I do not assume additional time has been granted.

Attached: [request, refusal and narrowly relevant sources]. Please confirm receipt.

[Name / date / safe reply route]

Source / limits: [RA04](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 05 · FERPA statement after adverse hearing

Use after the amendment hearing leaves the contested information unchanged.

### CHECK BEFORE COPYING

A statement is not an official finding that the record is false or a substitute for a separate appeal.

Subject: Statement concerning contested education-record information

To [verified institution office]:

Following the hearing decision dated [date] concerning [record locator], I submit this statement under 34 C.F.R. § 99.21(b):

[Concise statement commenting on the contested information or explaining disagreement. Identify factual support, attribution and uncertainty rather than speculating about motive.]

Please maintain this statement with the contested portion for as long as that portion is maintained and disclose it with that portion as required by § 99.21(c).

Please confirm receipt and identify where this statement has been associated with the record. If a required formatting step is missing, please tell me promptly.

[Name / date / safe reply route]

Source / limits: [RA04](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 06 · HIPAA access to designated records

Request your own PHI from a covered entity through its accepted identity/representative process.

### CHECK BEFORE COPYING

Not a third-party directive, blanket authorization or promise that every requested record/format falls within HIPAA access.

Subject: Access request under 45 C.F.R. § 164.524

To [verified records / privacy office]:

I request a copy of my protected health information in the designated record set for [dates and specified categories, including relevant medical/billing or plan records]. Please use your accepted secure verification process for [patient identifiers].

Please send the copy to me through [verified secure method]. I request [electronic format] if readily producible; otherwise please discuss an agreed readable electronic alternative.

Please advise me before incurring a permitted copying charge exceeding [amount]. This is a request for the records, not agreement to substitute a summary unless I separately agree.

If any part is denied, please provide the written basis, any applicable review right and complaint procedure, and make the remaining accessible information available. Please confirm receipt and the responsible office. Any extension should provide the reasons and completion date required by § 164.524(b)(2).

[Name / date / safe reply route / required signature]

Source / limits: [RA06](#) · [RA07](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

## 07 · HIPAA amendment request

Identify the specific designated-record-set information and the reason for correction.

### CHECK BEFORE COPYING

A request can be denied on specified grounds. Acceptance commonly involves an appended/linked amendment rather than deletion.

Subject: Amendment request under 45 C.F.R. § 164.526

To [verified privacy / amendment office]:

Record/date/page or field: [locator].

Current information: [exact wording or precise description].

Requested amendment: [specific correction/addendum].

Reason and support: [factual basis and limited source/attachment IDs].

If another originator is involved: [identify them; explain any reasonable basis for believing they are no longer available to act, if applicable].

Please act on this request within the applicable period. If accepted, please identify the affected records and how the amendment is appended or linked. Relevant recipients who may need the amendment are [names/roles and reason]; please discuss any needed agreement for notification.

If denied in whole or part, please provide the written basis and instructions for a statement of disagreement and complaint. Please confirm receipt.

[Name / date / safe reply route / required signature]

Source / limits: [RA08](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 08 · HIPAA disagreement / disclosure request

Choose one alternative after an amendment denial; remove the other before sending.

### CHECK BEFORE COPYING

The entity may reasonably limit length and use an accurate summary in specified later disclosures. This does not create an amendment hearing.

Subject: Response to amendment denial — [record / denial date]

To [verified privacy / amendment office]:

CHOOSE ONE; DELETE THE OTHER:

A. Statement of disagreement: I disagree with denial of the amendment to [record locator] because [concise factual reasons and source IDs]. Please append or link this statement and related dispute material as required by 45 C.F.R. § 164.526(d), provide any rebuttal to me, and include the required material or permitted accurate summary with later disclosure of the disputed information.

B. Without a statement of disagreement: Under § 164.526(d)(1)(iii) and (d)(5)(ii), I request that my amendment request and your denial, or an accurate summary, accompany subsequent disclosure of the disputed information.

Please confirm receipt and identify any required procedural step. This message does not authorize unrelated third-party disclosure.

[Name / date / safe reply route]

Source / limits: [RA08](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 09 · HIPAA accounting of disclosures

Request the statutory accounting for a defined period, not every internal access event.

### CHECK BEFORE COPYING

Significant exclusions apply. Ask separately about any existing access/audit logs; do not claim this rule covers all of them.

Subject: Accounting of disclosures under 45 C.F.R. § 164.528

To [verified privacy office]:

I request an accounting of covered disclosures of my protected health information for [period within the applicable six-year lookback]. My identifying information will be supplied through your accepted secure process.

Please provide the information required by § 164.528, including covered business-associate disclosures, subject to the regulation's exclusions and other provisions.

I prefer a readable electronic copy through [verified method]. Please confirm receipt and the office handling the request. If a permitted fee applies to a subsequent accounting within twelve months, please explain it in advance and allow me to modify or withdraw that subsequent accounting request before incurring it.

This request is for the accounting required by the rule, not an assertion that it includes every internal chart view. Please identify any separate available procedure for requesting existing access logs concerning [specific concern, if relevant].

[Name / date / safe reply route]

Source / limits: [RA09](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 10 · New Mexico IPRA request

Identify existing public-body records; verify current codification and official custodian instructions.

### CHECK BEFORE COPYING

Source gate: statutory text here is from the NMDOJ March 2025 reproduction. Do not use a public portal to request public release of a private chart.

Subject: Written IPRA request — [brief record description]

To [verified records custodian]:

I request inspection and electronic copies under the New Mexico Inspection of Public Records Act of these existing records:

[Numbered categories, dates, event IDs, likely offices/systems and reasonably particular description.]

For records available electronically, I specifically request the existing electronic file format, subject to applicable segregation and withholding rules. Please contact me before incurring authorized charges above [amount].

If any portion is withheld, please identify the applicable legal basis and provide releasable segregable portions. If you are not the responsible custodian, please handle forwarding and notice under the applicable Act provisions.

Please confirm receipt and identify the responsible office. This is an access request; it does not replace any separate preservation request, appeal or other filing.

Requester name: [name]

Address: [address]

Telephone: [telephone]

Reply email / date: [details]

Source / limits: [RA10](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

# 11 · Federal FOIA request

Use the agency/component's accepted FOIA route and fee/identity instructions.

## CHECK BEFORE COPYING

A twenty-working-day determination is not guaranteed complete production. Do not assert a fee waiver or expedited need without the required basis.

Subject: FOIA request — [records description]

To [verified federal agency / component FOIA office]:

Under 5 U.S.C. § 552, I request these existing agency records:

[Numbered categories, time period, likely offices/systems and known identifiers.]

I prefer [readily reproducible electronic format] delivered through [verified method]. Please provide reasonably segregable nonexempt portions if material is withheld and identify the basis for each withholding category.

Fee information: [accurate requester category and requested fee limit]. Please notify me before costs exceed [amount]. Any separate fee-waiver or expedited-processing request is [attached with its actual basis / not requested].

For personal records, I will follow your published identity-verification instructions. Please confirm receipt, the tracking number and any clarification needed to process this request. If denied, please provide the applicable administrative appeal instructions.

[Name / date / safe contact / required identity statement]

Source / limits: [RA11](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

## 12 · FOIA administrative appeal

Use the actual adverse determination and agency appeal rules.

### CHECK BEFORE COPYING

A template does not determine exhaustion, jurisdiction or a lawsuit deadline. Do not assume clarification or OGIS contact counts as this appeal.

Subject: FOIA administrative appeal — [tracking number]

To [verified agency appeals office]:

I appeal the determination dated [date], received [date], on request [number]. I am submitting through [accepted method] under the notice's appeal instructions.

Issues appealed: [specific withholding, search adequacy, fee or other appealable determination].

Reasons: [identify each disputed point and relevant factual/legal basis; do not invent evidence or citations].

Requested action: [reconsider the identified determination, conduct an appropriate search, release specified segregable portions or other supported relief].

Attached: [original request, determination, relevant correspondence and source IDs]. Please confirm receipt and the appeal tracking number, and provide a written determination with the applicable further-review information.

[Name / date / safe reply route / required signature]

Source / limits: [RA11](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

## 13 · Federal personal-record access

Check Privacy Act eligibility, system of records, exemptions and agency verification procedures.

### CHECK BEFORE COPYING

Not every personal record is accessible through § 552a; FOIA can have separate coverage. Do not upload identity documents to an unverified channel.

Subject: Access to records about me — [system / subject]

To [verified agency privacy / records office]:

I request access to records about me in [identified system of records, if known], concerning [categories, dates and relevant identifiers], under the Privacy Act to the extent applicable. Please also consider FOIA access where applicable under your procedures.

I will provide [required identity/eligibility verification] through [accepted secure method]. I prefer a readable electronic copy delivered to me through [verified route].

Please identify any applicable exemption or other basis for denying access, make available records/portions to which access is available, and provide the applicable review instructions. Please confirm receipt, the responsible office and any information needed to identify the relevant system or process.

[Name / date / safe reply route / required signature]

Source / limits: [RA11](#) · [RA12](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

## 14 · Privacy Act amendment request

Use the federal agency's amendment process for a covered record.

### CHECK BEFORE COPYING

The ten-working-day rule concerns acknowledgment, not a universal completed amendment. Agency/system exceptions remain important.

Subject: Privacy Act amendment request — [record / system]

To [verified agency amendment office]:

Under 5 U.S.C. § 552a(d)(2), to the extent applicable, I request amendment of the following record about me:

System and record locator: [details].

Existing information: [precise wording or field].

Requested change: [specific correction].

Basis: [why the information is not accurate, relevant, timely or complete; supporting source IDs].

I will meet your published identity/eligibility requirements through [accepted method]. Please acknowledge receipt and act promptly under the applicable provisions. If you refuse, please provide the reason and the procedure, official and time limit for requesting review under § 552a(d)(3).

This request does not withdraw another access request or substantive appeal.

[Name / date / safe reply route / required signature]

Source / limits: [RA12](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates](#).

# 15 · Receipt / scope / production clarification

Ask a bounded follow-up about an identified prior request.

## CHECK BEFORE COPYING

This is not necessarily an appeal or a new request. Check the actual notice and do not assume it resets or preserves a deadline.

Subject: Clarification of request [number] — submitted [date]

To [verified responsible office]:

I am following up on the attached exact request, submitted through [method], and your [receipt / response] dated [date].

Please clarify: [choose only what applies: receipt; responsible office; missing required information; current stage; classification; offered access; stated extension; or specific unproduced category].

For [identified item], does the response mean the record was not created, is not held here, was not found, is no longer retained, is withheld/redacted, or remains under review? Please identify the applicable basis and any available review instructions.

I am not intentionally withdrawing or replacing the original request. If you interpret this message as changing its scope or starting a new request, please tell me. I will separately check any appeal or other deadline.

[Name / date / safe reply route]

Source / limits: [RA03](#) · [RA07](#) · [RA10](#) · [RA11](#).

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

# 16 · Electronic request / production log

Private recordkeeping; use one entry per submission, notice or production.

## CHECK BEFORE COPYING

A log, hash, screenshot or receipt is not conclusive proof of legal filing, authenticity or timeliness.

Request / event ID:  
Record holder, office and purpose:  
Legal process / authority to check:  
Exact scope and request-version filename:  
Official route URL and date verified:  
Required form / identity step / safe delivery method:  
Sent date, time and time zone:  
Original message / headers / attachments preserved at:  
Receipt or portal confirmation / reference number:  
Bounce, error, rejected attachment or missing step:  
Operative clock / trigger / unit / source / uncertainty:  
Extension or decision notice / received date:  
Production date / filenames / formats / optional hashes:  
Missing category / withholding basis / follow-up:  
Appeal or review method / deadline to verify:  
Working copy / correction / transformation log:  
Next check and responsible person:

Organization tool; no legal deadline is calculated.

Keep the exact sent version, attachments, receipt and later replies. [Return to templates.](#)

# Read the authority, not just the label

These cards are bounded excerpts and explanations—not full statutes, complete legal tests or a case-specific determination.

|                                                                                        |                   |
|----------------------------------------------------------------------------------------|-------------------|
| <b>RA01 · FERPA education records</b><br>20 U.S.C. § 1232g; 34 C.F.R. §§ 99.3, 99.5    | <b>p. 43</b><br>→ |
| <b>RA02 · FERPA treatment-record exclusion</b><br>34 C.F.R. §§ 99.3, 99.10(f)          | <b>p. 44</b><br>→ |
| <b>RA03 · FERPA access and pending requests</b><br>34 C.F.R. §§ 99.10–99.12            | <b>p. 45</b><br>→ |
| <b>RA04 · FERPA amendment and hearing</b><br>34 C.F.R. §§ 99.20–99.22                  | <b>p. 46</b><br>→ |
| <b>RA05 · FERPA disclosure record and complaint</b><br>34 C.F.R. §§ 99.30–99.32, 99.64 | <b>p. 47</b><br>→ |
| <b>RA06 · HIPAA record sets and exclusions</b><br>45 C.F.R. §§ 160.103, 164.501        | <b>p. 48</b><br>→ |
| <b>RA07 · HIPAA access</b><br>45 C.F.R. § 164.524                                      | <b>p. 49</b><br>→ |

[Continue to amendment, accounting, IPRA, FOIA and other overlays.](#)

**VERSION DISCIPLINE**

An official resolving link can serve different text later. A current eCFR display is authoritative but unofficial. An agency guide reproducing a statute is not current official codification. Record the source version and scope of review, not merely a “checked” date.

# Authority cards: corrections and access

A working URL, textual support, current law and applicability are different checks.

|                                                                                  |                   |
|----------------------------------------------------------------------------------|-------------------|
| <b>RA08 · HIPAA amendment and disagreement</b><br>45 C.F.R. § 164.526            | <b>p. 50</b><br>→ |
| <b>RA09 · HIPAA accounting—not every file view</b><br>45 C.F.R. § 164.528        | <b>p. 51</b><br>→ |
| <b>RA10 · IPRA: record, access and process</b><br>NMSA 1978 §§ 14-2-6, 14-2-8–12 | <b>p. 52</b><br>→ |
| <b>RA11 · FOIA: federal records and review</b><br>5 U.S.C. § 552                 | <b>p. 53</b><br>→ |
| <b>RA12 · Privacy Act access and amendment</b><br>5 U.S.C. § 552a                | <b>p. 54</b><br>→ |
| <b>RA13 · Other record protections</b><br>34 C.F.R. § 300.613; 42 C.F.R. Part 2  | <b>p. 55</b><br>→ |

The New Mexico current-codification gate is visible on [RA10](#). Every source record also identifies whether this pass rechecked it. No inherited citation is silently promoted to current legal approval.

# FERPA education records

RA01 · 20 U.S.C. § 1232g; 34 C.F.R. §§ 99.3, 99.5

## RA01 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“Directly related to a student;”*

§ 99.3, education records, paragraph (a)(1); one of two required components.

## WHAT THIS TEXT ADDRESSES

The definition also requires maintenance by the educational agency/institution or a party acting for it. Media do not decide coverage. Eligible-student rights generally transfer at age 18 or attendance at a postsecondary institution.

## COMPONENTS TO CHECK

Check covered institution, attendance, actual record, maintenance and every relevant exclusion. The definition includes a person who is or has been in attendance, so leaving an institution does not itself remove retained records from the definition.

## LIMITS / UNFINISHED REVIEW

Student employment, sole-possession notes and law-enforcement-unit records have specific tests. A label such as “clinical,” “private” or “disciplinary” does not settle them. This card does not decide a civil remedy.

## SOURCE / VERSION

eCFR · Title 34 displayed current through September 17, 2026. Authoritative but unofficial; scoped Part 99 text check.

[WEB · Read the full text — FERPA regulations — 34 C.F.R. Part 99](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

## SOURCE / VERSION

Official GovInfo FERPA statute PDF resolving link; read September 19, 2026. Amendment-through date not independently established.

[WEB · Read the full text — FERPA — 20 U.S.C. § 1232g](#)

www.govinfo.gov · Retrieved 2026-09-19 · No independent legal signoff.

Return to [the authority index](#).

# FERPA treatment-record exclusion

RA02 · 34 C.F.R. §§ 99.3, 99.10(f)

## RA02 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“Made, maintained, or used only in connection with treatment of the student;”*

§ 99.3, education records exclusion (b)(4)(ii); incomplete excerpt.

## WHAT THIS TEXT ADDRESSES

The exclusion has multiple conditions: the specified older/postsecondary student, qualified treatment personnel, treatment-only use and disclosure only to treatment providers. Remedial education and instructional-program activities are not treatment for this definition.

## COMPONENTS TO CHECK

Ask who made and maintains the record, their professional role, why it was made and each use/disclosure. Under § 99.10(f), the student may have qualifying treatment records reviewed by a physician or other appropriate professional of the student’s choice.

## LIMITS / UNFINISHED REVIEW

Do not promise ordinary direct FERPA inspection, an automatic copy, or a 45-day treatment-record deadline. A non-treatment disclosure can bring the record under education-record rules; disclosure may still be authorized by FERPA. HIPAA does not automatically replace FERPA.

The HIPAA PHI definition expressly excludes both the relevant education and treatment records: [read the HIPAA boundary](#).

## SOURCE / VERSION

eCFR · Title 34 displayed current through September 17, 2026. Authoritative but unofficial; scoped Part 99 text check.

[WEB · Read the full text — FERPA regulations — 34 C.F.R. Part 99](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · HHS — Student health-clinic records: FERPA or HIPAA?](#)

Return to [the authority index](#).

# FERPA access and pending requests

RA03 · 34 C.F.R. §§ 99.10–99.12

## RA03 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“An educational agency or institution shall not destroy any education records if there is an outstanding request to inspect and review the records under this section.”*

§ 99.10(e); full sentence.

## WHAT THIS TEXT ADDRESSES

Education-record inspection/review must occur within a reasonable period, no more than 45 days after receipt. Reasonable requests for explanations and interpretations must be answered. Copying or other arrangements are required where circumstances effectively prevent inspection/review.

## COMPONENTS TO CHECK

Check requester rights, record scope, mixed-student information, receipt and any practical barrier to inspection. Search/retrieval charges are not permitted under § 99.11, although permitted copying fees can differ.

## LIMITS / UNFINISHED REVIEW

The no-destruction provision is specific and important. It is not a universal litigation hold for all institutional files. Ordinary electronic copies are not guaranteed merely by a preference for email. Separate other filing, appeal and preservation questions.

## SOURCE / VERSION

eCFR · Title 34 displayed current through September 17, 2026. Authoritative but unofficial; scoped Part 99 text check.

[WEB · Read the full text — FERPA regulations — 34 C.F.R. Part 99](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

Return to [the authority index](#).

# FERPA amendment and hearing

RA04 · 34 C.F.R. §§ 99.20–99.22

## RA04 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“within a reasonable time after the agency or institution receives the request.”*

§ 99.20(b), amendment-decision timing; excerpt.

## WHAT THIS TEXT ADDRESSES

A parent or eligible student may seek amendment of education-record information believed inaccurate, misleading or in violation of the student’s privacy rights. A refusal must advise the requester of the hearing right.

## COMPONENTS TO CHECK

At a hearing: reasonable scheduling and advance notice; a decision-maker without a direct interest in the outcome; opportunity to present evidence and assistance at the requester’s expense; a timely written decision based only on hearing evidence, with summary and reasons.

## LIMITS / UNFINISHED REVIEW

There is no general 45-day amendment/hearing deadline here. This is not a merits appeal of a grade or disciplinary decision merely because the decision appears in a record. After an adverse hearing result, § 99.21 permits a statement kept with, and disclosed with, the contested portion.

## SOURCE / VERSION

eCFR · Title 34 displayed current through September 17, 2026. Authoritative but unofficial; scoped Part 99 text check.

[WEB · Read the full text — FERPA regulations — 34 C.F.R. Part 99](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · Education Department — An Eligible Student Guide to FERPA](#)

Return to [the authority index](#).

# FERPA disclosure record and complaint

RA05 · 34 C.F.R. §§ 99.30–99.32, 99.64

## RA05 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“A complaint must be timely submitted to the Office.”*

§ 99.64(c); full sentence.

## WHAT THIS TEXT ADDRESSES

Under § 99.64(d), the complaint period is 180 days from the alleged violation or when the complainant knew or reasonably should have known of it; good cause may support an extension. SPPO’s current instructions identify the FERPA complaint form and submission method.

## COMPONENTS TO CHECK

For the school’s disclosure record under § 99.32, identify the covered requests/disclosures and exceptions. Consent and exceptions under §§ 99.30–31 are separate questions from whether a log is required.

## LIMITS / UNFINISHED REVIEW

The disclosure record is not every internal chart or file view. SPPO encourages resolving FERPA concerns with the school first; its page does not make this a universal FERPA prerequisite. Do not substitute ED OCR’s civil-rights process or a PPRA requirement.

## SOURCE / VERSION

eCFR · Title 34 displayed current through September 17, 2026. Authoritative but unofficial; scoped Part 99 text check.

[WEB · Read the full text — FERPA regulations — 34 C.F.R. Part 99](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · Student Privacy Policy Office — File a complaint](#)

Return to [the authority index](#).

# HIPAA record sets and exclusions

RA06 · 45 C.F.R. §§ 160.103, 164.501

## RA06 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“Used, in whole or in part, by or for the covered entity to make decisions about individuals.”*

§ 164.501, designated record set, paragraph (1)(iii); one branch of definition.

## WHAT THIS TEXT ADDRESSES

The designated record set includes specified provider medical/billing records and health-plan record systems as well as records used for decisions. The access right is not necessarily limited to the patient portal or one visit summary.

## COMPONENTS TO CHECK

First check HIPAA entity and PHI coverage. PHI excludes the FERPA education and treatment categories. HIPAA psychotherapy notes must satisfy a separate definition and be separated from the rest of the medical record.

## LIMITS / UNFINISHED REVIEW

Not every counseling or mental-health record is a HIPAA psychotherapy note. Diagnosis, medication, test results and specified summaries are excluded from that definition. A record may have other access routes without falling within § 164.524.

## SOURCE / VERSION

eCFR · Title 45 displayed current through September 17, 2026. Authoritative but unofficial.

[WEB · Read the full text — HIPAA definitions — 45 C.F.R. § 160.103](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

## SOURCE / VERSION

eCFR · Title 45 displayed current through September 17, 2026. Scoped definitions/access/amendment/accounting check only.

[WEB · Read the full text — HIPAA Privacy Rule — 45 C.F.R. Part 164, Subpart E](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

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# HIPAA access

RA07 · 45 C.F.R. § 164.524

## RA07 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“no later than 30 days after receipt of the request”*

§ 164.524(b)(2)(i); excerpt, subject to specified extension.

## WHAT THIS TEXT ADDRESSES

The covered entity must act on an access request within 30 days. One extension of no more than 30 days is allowed if reasons and a completion date are provided in writing within the initial period.

## COMPONENTS TO CHECK

Check designated record sets, identity/representative authority, denial grounds and requested format. Electronic information must be supplied in the requested electronic form/format if readily producible, or an agreed readable electronic form/format.

## LIMITS / UNFINISHED REVIEW

Some access denials are reviewable; others are not. An amendment request is a separate process. Psychotherapy notes and litigation-preparation information are excluded under (a)(1); that does not automatically exclude the underlying medical facts or records. No promise of every requested file format.

## SOURCE / VERSION

eCFR · Title 45 displayed current through September 17, 2026. Scoped definitions/access/amendment/accounting check only.

[WEB · Read the full text — HIPAA Privacy Rule — 45 C.F.R. Part 164, Subpart E](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

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# HIPAA amendment and disagreement

RA08 · 45 C.F.R. § 164.526

## RA08 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“appending or otherwise providing a link to the location of the amendment.”*

§ 164.526(c)(1); excerpt describing minimum accepted-amendment method.

## WHAT THIS TEXT ADDRESSES

The entity must act within 60 days of receipt, with one additional period of up to 30 days if timely written reasons and a completion date are given. Acceptance entails an appropriate amendment, identification of affected records and linked/appended correction.

## COMPONENTS TO CHECK

Denial grounds include originator (with an unavailability qualification), designated-record-set/access scope and accuracy/completeness. Denial must explain the basis, disagreement process and complaint route. Relevant recipients and notification duties have their own conditions.

## LIMITS / UNFINISHED REVIEW

A disagreement can be reasonably length-limited. The entity may rebut but must give the individual a copy. The rule provides linkage and future-disclosure requirements, including permitted accurate summaries; it does not promise erasure or an independent amendment hearing.

## SOURCE / VERSION

eCFR · Title 45 displayed current through September 17, 2026. Scoped definitions/access/amendment/accounting check only.

[WEB · Read the full text — HIPAA Privacy Rule — 45 C.F.R. Part 164. Subpart E](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

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# HIPAA accounting—not every file view

RA09 · 45 C.F.R. § 164.528

## RA09 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“in the six years prior to the date on which the accounting is requested, except for disclosures:”*

§ 164.528(a)(1); excerpt introducing significant exclusions.

## WHAT THIS TEXT ADDRESSES

An accounting covers specified disclosures, including relevant business-associate disclosures. The entity acts within 60 days, with one extension of no more than 30 days on timely written reasons and a completion date. The first accounting within 12 months is without charge.

## COMPONENTS TO CHECK

Request a defined period within the covered six-year lookback. Check exclusions, including treatment/payment/operations and authorized disclosures; special suspension and research-accounting provisions can matter.

## LIMITS / UNFINISHED REVIEW

This is not a complete internal access audit. A separate request for existing access logs or amendment history is possible, but entitlement and release depend on the relevant law and record. No inference of missing evidence follows merely because an accounting omits an exempt category.

The six-year accounting lookback is not a universal clinical-record retention period.

## SOURCE / VERSION

eCFR · Title 45 displayed current through September 17, 2026. Scoped definitions/access/amendment/accounting check only.

[WEB · Read the full text — HIPAA Privacy Rule — 45 C.F.R. Part 164, Subpart E](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

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# IPRA: record, access and process

RA10 · NMSA 1978 §§ 14-2-6, 14-2-8–12

## RA10 · SOURCE STATUS

CURRENT-CODIFICATION GATE OPEN · March 2025 agency reproduction, checked against the official gateway; not certified current law.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“that relate to public business, whether or not the records are required by law to be created or maintained.”*

§ 14-2-6(H), end of “public records” definition, as reproduced in the NMDOJ 2025 guide.

## WHAT THIS TEXT ADDRESSES

Public-body/public-business classification and public inspectability are different inquiries. A confidential student record can fit the public-record definition while protected information is not publicly releasable. Apply FERPA and the relevant access exceptions separately.

## COMPONENTS TO CHECK

The reproduced text requires reasonable specificity and requester information for written requests; email/fax qualify. It addresses prompt inspection, 3-business-day advice when inspection is delayed, a 15-calendar-day outside period subject to the burdensome/broad-request provision, and segregation/electronic format.

## LIMITS / UNFINISHED REVIEW

This is an official agency reproduction, not current official codification verified through this release date. Do not infer a right to all student or medical records, a guaranteed release by day 15, or the meaning of “public record” in a different criminal statute. Current text/cases must be checked.

## SOURCE / VERSION

NMDOJ Ninth Edition · March 2025 statutory reproduction with commentary. Current official codification remains unverified.

[WEB · Read statutory reproduction — NMDOI IPRA Compliance Guide — Ninth Edition](#)

nmdoj.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · NMDOI — Inspection of Public Records Act](#)

[WEB · New Mexico Compilation Commission](#)

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# FOIA: federal records and review

RA11 · 5 U.S.C. § 552

## RA11 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“reasonably describes such records”*

§ 552(a)(3)(A)(i); excerpt.

## WHAT THIS TEXT ADDRESSES

FOIA governs covered federal agencies and existing agency records, not state/local bodies, Congress or federal courts. It provides requested readily reproducible formats and reasonably segregable nonexempt portions.

## COMPONENTS TO CHECK

Ordinary initial determination: 20 working days, with proper-component receipt/routing and permitted tolling rules. Written unusual-circumstances provisions allow specified extensions. A determination is not necessarily completed production. Adverse decisions provide an appeal period of at least 90 days; expedited-processing decisions have a distinct 10-day rule.

## LIMITS / UNFINISHED REVIEW

Use current agency regulations and the actual notice. Fee, identity, exemptions, exhaustion and litigation rules require separate analysis. OGIS assistance is not an agency appeal or a promise that an appeal clock stops. Source retrieval alone does not certify later amendments/cases.

## SOURCE / VERSION

Official GovInfo Code PDF resolving link, read September 19, 2026. Amendment-through date and later cases not certified.

[WEB · Read the full text — FOIA — 5 U.S.C. § 552](#)

www.govinfo.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · FOIA.gov — How to make a FOIA request](#)

[WEB · OGIS — Request assistance](#)

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# Privacy Act access and amendment

RA12 · 5 U.S.C. § 552a

## RA12 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“permit the individual to request amendment of a record pertaining to him”*

§ 552a(d)(2); excerpt.

## WHAT THIS TEXT ADDRESSES

The Privacy Act supplies a separate federal personal-records pathway. The basic “individual” definition is a U.S. citizen or lawful permanent resident; a system of records has a personal-identifier retrieval criterion. Other eligibility provisions and exemptions need individual checking.

## COMPONENTS TO CHECK

Amendment-request acknowledgment: 10 working days. Amendment action must be prompt, but that is not a uniform 10-day decision rule. Administrative review of amendment refusal: normally within 30 working days of a review request, with a good-cause extension by the agency head.

## LIMITS / UNFINISHED REVIEW

Do not import HIPAA’s access clock. Verify the agency’s access/amendment procedures, identity requirements, system and exemptions. FOIA and Privacy Act processing can overlap; neither label guarantees release or deletion of every record. Court and damage remedies are not decided here.

## SOURCE / VERSION

Official GovInfo Code PDF resolving link, read September 19, 2026. Amendment-through date and agency/system rules not certified.

[WEB · Read the full text — Privacy Act — 5 U.S.C. § 552a](#)

www.govinfo.gov · Retrieved 2026-09-19 · No independent legal signoff.

Return to [the authority index](#).

# Other record protections

RA13 · 34 C.F.R. § 300.613; 42 C.F.R. Part 2

## RA13 · SOURCE STATUS

SCOPED TEXT CHECK · Sources read September 19, 2026; not independent legal signoff.

## EXACT EXCERPT · NOT THE FULL PROVISION

*“without unnecessary delay”*

34 C.F.R. § 300.613(a); short excerpt.

## WHAT THIS TEXT ADDRESSES

IDEA Part B record access can be required before specified IEP meetings, hearings or resolution sessions and in no case more than 45 days after the request. It applies in that special-education context—not to every student.

## COMPONENTS TO CHECK

For substance-use-disorder information, separately check Part 2 program/record coverage, recipient/use and current rules. HHS identifies February 16, 2026 as the general compliance date for its 2024 final rule, but states a separate future compliance-date qualification for the new accounting right.

## LIMITS / UNFINISHED REVIEW

Do not assume all mental-health records are Part 2 records, or that every new Part 2 accounting requirement was operative on February 16, 2026. Information-blocking and court-record processes also need their own coverage checks. No general access/amendment clock is supplied for all these overlays.

## SOURCE / VERSION

Official Education Department reproduction of § 300.613; page last modified May 3, 2017. Scoped text check.

[WEB · Read the full text — IDEA access — 34 C.F.R. § 300.613](#)

sites.ed.gov · Retrieved 2026-09-19 · No independent legal signoff.

## SOURCE / VERSION

eCFR current-display Part 2; read September 19, 2026. Scoped overlay review; authoritative but unofficial.

[WEB · Read the full text — Part 2 — 42 C.F.R. Part 2](#)

www.ecfr.gov · Retrieved 2026-09-19 · No independent legal signoff.

[WEB · HHS — 42 C.F.R. Part 2 final-rule fact sheet](#)

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# Edition, corrections and release review

v1.0-rc1 · September 19, 2026 · Prepared and maintained by Brandon N.Gallegos.

## WHAT THIS CANDIDATE CONTAINS

A records classification/access/amendment workflow, sixteen reusable tools, thirteen internal authority cards and versioned source/clock records. Legal information and organization tools—not legal representation or an assessment of any person’s case.

## WHAT WAS VERIFIED

A fresh scoped official-source text pass for the new records material. Federal Code resolving links and eCFR editions are identified distinctly; the NMDOJ statutory reproduction remains labeled. The source ledger records access date, text edition, checked propositions and open limitations.

## WHAT REMAINS OPEN

Current official NM IPRA codification/controlling treatment; complete inherited Atlas source/contact recertification; case-specific vehicles, remedies and deadlines; independent legal review; physical printing and assistive-technology/keyboard testing. The accompanying QA report states actual visual/mechanical review scope.

### PUBLIC RELEASE IS NOT YET APPROVED

This package is complete as a review candidate, not certified as the stable public version 1. A PDF that looks finished does not close a source, access or legal-review gate. The report and manifest keep approval flags false.

## UPDATES / CORRECTIONS

No stable public corrections address or update website has been supplied. Obtain a later edition through the person who supplied this review copy and independently check the linked official text. No automatic update or monitoring is promised. Preserve old editions and material correction history.

The offline package includes canonical JSON, build code, template TXT, HTML alternatives, source/clock data and external checksums. No font files or private evidence are included. Native Core integration remains separate from these companion builds.