

Plumbing Board Meeting Minutes

January 19, 2016 at 9:30 a.m.

Minnesota Room – Department of Labor and Industry
443 Lafayette Road North, St. Paul, MN 55155

Members

Joe Beckel
Jeff Brown
Grant Edwards (Vice Chair)
Scott Eggen
John Flagg
Henry Gretsfeld
Larry Justin
Jim Kittelson
Jim Lungstrom
John Parizek (Chair)
Phillip Sterner (Secretary)
Ron Thompson

Members Absent

Mike Herman
Pete Moulton

DLI Staff & Visitors

Wendy Legge (Chief Gen. Counsel, DLI)
Suzanne Todnem (DLI)
Jim Peterson (DLI)
Cathy Tran (DLI)
Lyndy Lutz (DLI)
Lori Herzog (DLI)
Charles Olson (DLI)
Ethan Landy (DLI)
Brad Jensen (DLI)
Gary Thaden (MMCA)
Matt Marciniak (IAPMO)
David Ybarra (MPTA)
Dean Gale (Plumbers Local 34)
Jim Gander (Superior Mechanical)
Chad Filek (J-Berd Mechanical)
Dennis Schilling (City of West St. Paul)
Dwight Engen (Minnesota LECET)
Scott Thompson (MN Plumbing Training)
Richard Hauffe (ICC)
Christina Rieck Loukas (Attorney)
Jami Sehm (City of Blaine)
Gary Ford (Metro Testing)
Luke Westman (PHCC)
Dean Berckes (Dept. of Military Affairs)
Grant Brekke (ASPE)

I. Call to Order

The meeting was called to order by Chair Parizek at 9:41 a.m. Introductions and housekeeping announcements were made. Attendance was taken; a quorum was met.

II. Approval of Meeting agenda

A motion was made by Gretsfeld, seconded by Kittelson, to approve the agenda with the addition of "X. Announcements, Item B) Closed Session, in order for the Board to discuss pending lawsuits." The vote was unanimous; the motion carried.

III. Approval of Previous Meeting Minutes

A. Special Meeting – December 29, 2015

A motion was made by Flagg, seconded by Eggen, to approve the minutes with the changes noted below. The majority vote ruled with one abstention (Beckel); the motion carried.

- Jeff Brown – via teleconference was listed under members.
- Correct spelling of Tom McCarthy (Plumbers Local #34) was noted.
- The following addition was made after VI. Special Business continued section: *The meeting was re-opened to the public and the meeting was recorded.*

IV. Regular Business

Approval of Expense Reports – Parizek approved the expenses as presented.

V. Committee Reports

A) Department Updates

No updates

B) Executive Committee

The meeting was called to order and immediately adjourned due to lack of a quorum.

Parizek and Tran attended a meeting regarding the Water Reuse Workgroup and how to expand in Minnesota. Parizek noted the group has become much more organized and will develop a consistent message about water reuse as well as strategies to support safe and sustainable reuse. The Workgroup has agency leadership commitment and funding from the Clean Water Fund. The legislature charged the Workgroup with preparing a comprehensive study of, and recommendations for, regulatory and non-regulatory approaches for use in the development of state policy for water reuse in MN. Parizek said he will update the Board on the Workgroup's progress and noted they have two years to develop a report for the legislature.

C) Construction Codes Advisory Council

There has not been a meeting.

D) UPC Amendment Committee

The amendments were submitted on-time to IAPMO for possible amendments. All work for the UPC Amendment Committee was completed; therefore, Parizek dissolved the Committee.

VI. Special Business

A) Board Member Training (See Attachment A)

Legge presented *Data Practices, Records Retention and the Open Meeting Law: An Introduction for the Plumbing Board*.

Legge said she has no recommendation to change the Plumbing Board retention schedule.

B) RFI PB0082 – 301.1.2, 301.2 Standards and Alternates (See Attachment B)

The Board reviewed the Request for Interpretation from Grant Brekke regarding Table 14, ASME A112.14.3, 301. (After a lengthy discussion, the Board did not find a viable section of the code to interpret and asked the presenter if the RFI could be dismissed. Brekke agreed and Parizek noted the RFI was dismissed.)

Discussion highlights:

- Legge noted that the Board does not have the power to approve specific products, only to interpret the plumbing code.
- Tran said the department would accept grease interceptor meeting ASME A112.14.3 standard as an alternate but cities may honor this but could reject if they were not familiar with the product.
- In summary, hydromechanical grease interceptors may be considered and approved by the AHJ as alternates under 301.2.
- Brekke responded that the UPC understood what happened when they removed ASME standard for hydro mechanicals from the body in 2012. There is no clear guidance from the UPC on what constitutes an approved grease interceptor. Theoretically then hydro mechanicals aren't approved because they aren't in the body of the 2012 UPC.
- Legge said this appears to be an amendment of the code not an interpretation. The Board could decide to make this amendment to the code in the next rulemaking process.

The meeting broke at 11:07 a.m. and resumed at 11:24 a.m.

- Legge said the RFI would need to point to the specific language in the code and propose an interpretation for the Board to consider. Then discussion on how the interpretation can affect other things.

- Legge said she has a legal concern about the portion of the RFI that specifies ASME A112.14.3. Where does this language appear in the language of the code? The code cannot be amended through interpretation; only the language that is there can be interpreted referencing ASME A112.14.3. Legge asked again, what sentence in the code Brekke is asking for an interpretation of.
- Justin said he proposes that the technical documentation submitted to the Board be approved because it meets the intent of the code.
- Legge said the Board is not an authority having jurisdiction and Tran agreed.
- Lungstrom added that if an authority having jurisdiction contacted the department they would tell them it was an acceptable product. Parizek said the department could publish something on DLI's website. Brekke said this would be acceptable. Parizek said this would be a solution for now and could be re-addressed if any issues arise.
- The Board did not find a viable section of the code to interpret and asked the presenter if the RFI could be dismissed. Brekke agreed and Parizek noted the RFI was dismissed.

C) Review of Forms

- a. RFA – Request for Action form is available on the department's website at: http://www.dli.mn.gov/PDF/pb/pb_request_for_action.pdf Parizek reviewed the RFA form and the board discussed possible revisions/additions to the form, as follows:
 - Chapter 4715 should read Chapter 4714 where found
 - Revised language, top of page 1 as follows:
 - Specify the purpose of the proposal: (If recommendation for code change for ~~fixture~~, appurtenance, ~~material~~, or method (check all that apply)
 - Remove boxes and language for the following: Material, Method of installation, joining, etc. and Fixture.
 - Standards and Product Approvals or Listings: Remove all 3 sections
 - Page 4 – Information regarding Committee and/or Board function:
 - The ~~Product and Code Review Committee serves to advise the~~ Plumbing Board or designated Committee.

Legge noted that the By-Laws should be reviewed at the next Board meeting.

A motion was made by Justin, seconded by Flagg, to adjust the RFA form as shown above. The vote was unanimous; the motion carried.

- b. RFI – Request for Information form is available on the department’s website at: http://www.dli.mn.gov/PDF/pb/pb_request_for_interpretation.pdf
- Chapter 4715 should read Chapter 4714 where shown.
 - Split “Explain what you believe the Code to read and why you disagree with the interpretation given to you by DLI staff” to read in two separate boxes as follows:
 - Box 1: Explain why you disagree with the interpretation given to you by DLI staff.
 - Box 2: What is your interpretation of the language?
 - List any other information you would like the Committee Board to consider.
 - Information for presentation to the Board Committee
 - You will be notified with the date of the Committee Board meeting in which your Request for Interpretation will be heard.
 - Remove “I understand that the Code Interpretation Committee has the authority to issue final interpretation on behalf of the Plumbing Board.”

A motion by Flagg, seconded by Edwards, to accept all changes noted above on the RFI form. The vote was unanimous; the motion carried.

D) Chapter 4716, Request for Comments

Parizek noted issues:

- CE requirements reviewed to determine if modifications need to be made.
- There is nothing in the code regarding 4716 rain water catchment systems and there may be modifications due to the water conditioning industry. There are differences in the statutes regarding medical gas – some of the language has changed as it refers to categories/levels and the language may need to be corrected through the legislature.

VII. Complaints

Enforcement is taking action on files turned over to Charlie Durenberger regarding CE and backflow requirements.

VIII. Open Forum

Fonda Ruth Thompson addressed the Board regarding online Continuing Education requirements.

- Legge referred to MN Statute 326B.0981, Subd. 4 regarding CE courses.
- Legge told Ms. Thompson she would need to go through legislature not the Board as this is a statewide law.

IX. Board Discussion

Parizek said Iowa and SD are discussing reciprocity. Minnesota is interested and current reciprocity is still being honored. Wisconsin is out of the mix right now and not sure about Nebraska for licensing requirements. Parizek said the Board can move forward with trying to work something out with the surrounding states.

X. Announcements

- A) Next regularly scheduled meetings – all meetings will be held at 9:30 a.m. in the Minnesota Room. The Executive Committee meetings occur at 8:00 a.m. prior to each regular meeting in the Minnesota Room.
 - a. April 19, 2016
 - b. July 19, 2016
 - c. October 18, 2016
- B) Closed Session – The Board meeting went into a closed session. The Board chair announced that the closed session was for the purpose of the attorney-client privileged discussions regarding the ongoing litigation. All visitors and non-board members were asked to leave the meeting and it was not recorded.

The meeting was re-opened to the public and the meeting was recorded.

XI. Adjournment

A motion was made by Edwards, seconded by Eggen, to adjourn the meeting at 2:24 p.m. The majority vote ruled; the motion passed.

Respectfully submitted,

Phil Sterner

Phil Sterner

Data Practices, Records Retention and the Open Meeting Law: An Introduction for the Plumbing Board

Wendy Willson Legge
DLI Chief General Counsel
January 19, 2016

The Data Practices Act (DPA)

Minnesota Statutes, Chapter 13

- Presumes government data is public
- Classifies data that is not public
- Provides rights for the public and data subjects
- Requires that data on individuals is accurate, complete, current, and secure

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"Data" is interpreted broadly



- Saved telephone messages
- Microfilm
- E-mails, notes, drafts
- Computer records

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Data Practices Act

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Why is the DPA important?

- Board members and DLI staff need data to perform our jobs
- The Data Practices Act tries to balance:
 1. Our need to have and use data to do our work
 2. Public's right to know about the activities of government
 3. Privacy rights

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What about mental impressions?



- Why didn't the Plumbing Board put my issue on its agenda?
- Not "data" because not recorded in any way
- But if you write it down, it becomes data!

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What is the "Data Practices Act" ?

- Minnesota's law that's like the Federal Freedom of Information Act
- It's the law that allows people to access some but not all information maintained by Plumbing Board.
- When someone outside the Board asks to look at or get a copy of documents maintained by the Board, it's called a "data practices request."

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Why is the DPA important?

- DPA requires the Plumbing Board and DLI to:
 1. Protect the rights of data subjects
 2. Provide appropriate access to government data

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Government data vs. personal data

- Personal data is outside the scope of the Data Practices Act
- Not created in a person's capacity as a Plumbing Board member or government employee
- Must be entirely personal to be outside DPA

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Government data vs. personal data

- Example: I send an e-mail to Suzanne on my DLI computer, using my DLI e-mail account, and ask Suzanne if she wants to have lunch on Friday.
 - That's personal data.
- Example: A Board member sends an e-mail to another Board member about an issue to be discussed in an upcoming Board meeting.
 - That's government data.

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Classification of government data

- Data not on individuals: data that are not about individuals, e.g., data on businesses, organizations, or intangible objects



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Terms used to classify government data

- "Confidential" data is data that's about an individual but is not available to the subject of the data
- "Protected nonpublic" – comparable term used for data not on individuals

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Classification of Data



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Terms used to classify government data

- Different terms are used depending on who has access to the data (other than Board members and DLI staff)
- Data is "public" if anyone can have access to it for any reason.
- If data is not public, then the term used depends on who's the data subject – whether it's data on individuals or data not on individuals

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"Not Public"

- Anything that's not public
- Includes private and confidential data on individuals
- Includes nonpublic and protected nonpublic data on corporations or other entities

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Classification of government data

- There are two types of government data
 - Data on individuals: an individual can be identified as the subject of the data



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Terms used to classify government data

- "Private" data is data about an individual that's not available to the public but is available to:
 - the subject of the data; and
 - anyone that the subject of the data authorizes to have access to the data.
- "Nonpublic" – comparable term used for data not on individuals

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Examples of Data Classification



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Example: Social security numbers



- Private

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DATA SECURITY



- DPA requires the Plumbing Board to maintain the security of not public data.

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Consequences of a data breach



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Example: Identity of the complainant



- Private

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Security of email



- When is email from DLI encrypted
 - Not public
 - Not to someone in the state email system (state.mn.us)

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Types of Data Breaches

There are 3 kinds of data breaches:

1. Not public data is provided to an unauthorized person



September 2, 2015

Example: Attorney-client privilege



- Confidential
- But can be waived

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Data Security

- Remember:
 - If you reply to an encrypted mail, your reply is encrypted.
 - The attachments to an encrypted email are also encrypted.

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Types of Data Breaches

2. Not public data is viewable by an unauthorized person.



September 2, 2015

Types of Data Breaches

3. A Board member accesses not public data for an impermissible reason.



September 2, 2015

Consequences of a data breach

Consequences that apply to intentional data breaches:

- **Willfully** violating the data practices act; or
- **Knowingly** accessing not public data for a reason other than Plumbing Board business

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Consequences of a data breach

- Consequences of **any** data breach (accidental or intentional) involving data on one or more individuals:

1. Provide written notice:
 - The Board must give **written** notice to each individual data subject.



September 2, 2015

Consequences of a data breach

- Data breaches can be:

Accidental



September 2, 2015

Consequences of a data breach

- Criminal penalty
 - Misdemeanor
- Disciplinary action
 - Suspension or dismissal



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Consequences of a data breach

2. Investigate:
 - The Board must conduct an investigation into the data breach.



September 2, 2015

Consequences of a data breach

or **Intentional**



September 2, 2015

Consequences of a data breach

- Consequence of **any** violation of the data practices act (accidental or intentional, whether the data is about an individual or some other entity):
 - The person harmed can sue the Plumbing Board.



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Consequences of a data breach

3. Prepare a report:
 - The Board must prepare a report on the facts and results of the investigation.



September 2, 2015

RESPONDING TO DATA REQUESTS



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Records Retention

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The Official Records Act

- Official records can be stored in any media



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Responding to data requests

- The Responsible Authority (an individual designated by the Board) is responsible for responding to data requests.

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Two laws related to DPA

- The Official Records Act**
 - Minnesota Statutes, section 15.17
- The Records Management Statute**
 - Minnesota Statutes, section 138.17



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Records Management Statute

- Requires government entities to follow a process when disposing of official records that are no longer needed, which includes:
 - Establishing records retention schedules
 - Documenting the destruction of official records
 - Protecting not public information when you destroy records

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Deadline for responding



- Deadline depends on who's requesting the data
 - Member of the public-- Reasonable amount of time
 - Individual data subject-- Immediately, if possible, or within 10 business days

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The Official Records Act

Minnesota Statutes, section 15.17

"All ... agencies of the state ... shall make and preserve **all records necessary to a full and accurate knowledge of their official activities.**"

These are the records needed for the public to understand what Plumbing Board is doing and why.

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Records Retention Schedule

- Plumbing Board has a retention schedule
- Shows minimum retention requirements
- BUT REMEMBER:** If there is a litigation hold in place, records that are covered by the litigation hold must be retained even though they are older than the retention schedule.

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Destruction of records



- To protect not public information when destroying records, shred or put in confidential bin for destruction.

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Purposes of the OML

- Prohibit "secret meetings"
- Ensure the public's right to be informed
- Allow members of the public to be present at open meetings

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Is an *email* meeting subject to the OML?

- OML is silent on the issue, courts have yet to definitively decide.
- But the experts at the Department of Administration IPAD say "yes."
- Be careful about email meetings.



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Open Meeting Law

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Is the Plumbing Board a "public body" that must comply with the OML?



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Can the Plumbing Board meet by telephone or other electronic means?

- OML says "Yes" if:
 - All members can hear one another
 - Public can hear discussion, votes and participate in testimony
 - One member of the Board is at regular meeting location
 - Votes are by roll call
 - Notice must be posted on the Board website at least 10 days before the meeting

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Open Meeting Law (OML) Minnesota Statutes, Chapter 13D

- With limited exceptions, all meetings of public bodies must be open to the public (Minn. Stat. § 13D.01)
- The public has a right to attend open meetings
- The public has a right to inspect meeting materials

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What is a *meeting* of a public body?

- Not defined in the OML
- MN Supreme Court's definition
 - "Quorum rule": Gathering of a quorum of the public body when that quorum is transacting public business
- Chance or social gatherings are not meetings

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How must the Board give notice of telephone meetings? Minn. Stat. § 13D.015

- Notice must include:
 - The regular meeting location
 - That some members may participate by telephone/electronically
 - Remote monitoring requirements for the public

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Remote monitoring



- "to the extent practical" the Board must allow members of the public to monitor the meeting from a remote location
 - The Board can charge for documented costs

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What is required if someone requests personal notice of a *special* meeting? Minn. Stat. § 13D.04, subd. 2(b)-(f)

- Three days before the special meeting:
 - Mail/deliver notice to requestors, or publish notice in official or qualified newspaper
- Personal notice must include date, time, place, and purpose of the meeting
- Requests must be written
- Personal notice requests may be limited to specific topic areas

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What are the notice requirements for *closed* meetings? Minn. Stat. § 13D.04, subd. 5



- The same notice requirements for open meetings apply to closed meetings

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How must the Plumbing Board give notice for a *regular* meeting? Minn. Stat. § 13D.04, subd. 1

- Keep a schedule of regular meetings on file at the Board's primary office
- No additional notice requirement except:
 - Telephone meeting: post notice on website 10 days before the meeting
 - Change in date, time, or place: give notice as if special meeting

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What is an *emergency* meeting? Minn. Stat. § 13D.04, subd. 3

- An emergency meeting is:
 - A special meeting
 - Called because of circumstances that require immediate consideration
- Calling an emergency meeting is within the judgment of the Board
- *Emergency* is not defined
- More limited notice requirements

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What must the Board do before closing a meeting? Minn. Stat. § 13D.04, subd. 5

- Before closing a meeting, a Board member must make a statement on the record that:
 - Provides the specific grounds that permit a closed meeting (statute citation or attorney-client privilege)
 - Describes the subject to be discussed
- All closed meetings, **except** those closed by attorney-client privilege, must be recorded

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How must the Board give notice for a *special* meeting? Minn. Stat. § 13D.04, subd. 2

- Three days before a special meeting:
 - Post written notice on principal bulletin board or usual meeting room door
- Notice must include date, time, place, and meeting purpose
 - Purpose should include specific topics

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Does OML allow any closed meetings?

- Must close:
 - Discussion of active criminal investigations
 - Discussion of identifiable medical data
- May close:
 - Attorney-client privilege

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Are there penalties for violating the OML? Minn. Stat. § 13D.06

- Intentional violation
 - Personal liability - \$300 fine
- Three intentional violations
 - Forfeit office
- Court may award reasonable costs, disbursements, attorneys fees up to \$13,000
- No reversal of Board actions for OML violation

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What are some common misconceptions about the OML?

- No requirement to post notice of regular meetings
- The OML doesn't require Robert's Rules of Order
- The OML doesn't give the public a right to speak at open meetings



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• QUESTIONS??



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Plumbing Board
c/o Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155-4344
www.dli.mn.gov

Plumbing Board Request for Interpretation

PRINT IN INK or TYPE

NAME OF SUBMITTER GRANT BREKKE	Rule(s) to be interpreted (e.g., 4715.0330) TABLE 14, ASME A112.14.3, 301
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The Minnesota Plumbing Code (MN Rules, Chapter 4715) is available at www.dli.mn.gov/CCLD/PlumbingCode.asp

Has a request for interpretation been submitted to Department of Labor and Industry (DLI) staff, either as a verbal request or a written request? Yes No

If "No," contact DLI staff at 651-284-5187. The DLI is responsible for administration and interpretation of the Minnesota Plumbing Code, and all requests must be processed and provided a DLI interpretation before being referred to the Plumbing Board. This form is intended to be used to request an interpretation from the Plumbing Board's Code Interpretation Committee only as a resolution of dispute with DLI interpretation.

CODE/RULE to be interpreted: 14.1, REFERENCED SECTION 301	NAME OF DLI employee gave interpretation: CATHY TRAN	DATE interpretation originally requested: 8-26-2015
--	---	--

Provide a copy of the DLI interpretation with this request (a copy must be provided as reference).

Is there a local dispute with an Inspector of other official? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If Yes, state the name or type of official
--	--

State the circumstances of the initial dispute:

In the 2009 UPC STANDARD, ASME 112.14.3 was referenced in table 14 to section 1014. In the UPC 2012, the referenced section is now 301. In the UPC 2015, the body of the code references the ASME A112.14.3 standard and table 14 references section 1014.

Explain what you believe the Code to read and why you disagree with the interpretation given to you by DLI staff.

Cathy Tran is citing that since ASME A112.14.3 is now referenced in section 301, (in the UPC 2012, table 14) all Hydromechanical grease interceptors will now have to be approved by the AHJ for all jobs and installations. This is a huge step backwards from 2012 when the Mn Plbg code finally voted on and passed adopting the language of the 2009 grease interceptor language. This discrepancy was changed by UPC for the 2015 version.

List any other information you would like the Committee to consider:

UPC admitted that the language of the 2012 UPC code and the standards in chapter 14 did not provide clear direction on what grease interceptors were approved. They cleared this up in the 2015 code by referencing ASME A112.14.3 in the body of the language and in table 14.

Information regarding submitting this form:

- Submit any supporting documentation to be considered electronically to DLI.CCLDBOARDS@state.mn.us. Once your Request For Interpretation form has been received, it will be assigned a file number. Please reference this file number on any correspondence and supplemental submissions.

Information for presentation to the Committee:

- You will be notified with the date of the Committee Meeting in which your Request For Interpretation will be heard.
- Limit presentations to 5 minutes or less.
- Be prepared to answer questions regarding the Code, the circumstances that led to the dispute and please bring copies of any documentation.

Information regarding Committee and/or Board function:

- The Code Interpretation Committee serves on behalf of the Plumbing Board to issue final interpretation.

What you can do if you disagree with the Committee's determination:

- If you would like to appeal the Code Interpretation Committee's determination, please notify us within thirty (30) days and it will be forwarded to the Administrative Law Judge for final interpretation.

Office Use Only

RFI File No.	Date Received by DLI	Dated Received by Committee	Date of Committee Meeting
Title of RFI	By:		

This material can be made available in different forms, such as large print, Braille or on a tape. To request, call 1-800-342-5354 (DIAL-DLI) Voice or TDD (651) 297-4198.

I understand that the Code Interpretation Committee has the authority to issue final interpretation on behalf of the Plumbing Board.

Submitted by:

NAME		FIRM NAME		
GRANT BREKKE		BREKKE SALES		
ADDRESS		CITY	STATE	ZIP CODE
5909 BAKER ROAD, SUITE 580		MINNETONKA	MN	55345
PHONE	SIGNATURE (original or electronic)		DATE	
(952) 936-9551	GRANT BREKKE		11/09/2015	

For Assistance or questions on completing this form, please call 651-284-5898 or 651-284-5889.

Mailing address:

Plumbing Board
c/o Department of Labor and Industry
443 Lafayette Road North
St. Paul, MN 55155-4344

*** Please remember to attach all necessary explanations and supporting documentation***