

Guardianship/Conservatorship Monitoring

RECOMMENDED DATA ELEMENTS

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Introduction

State courts are responsible for appointing and monitoring guardians and conservators¹, ensuring the protected person's best interests are the basis for the personal and financial decisions made. To effectively manage these cases, courts need accurate data to monitor both the court's and the guardian's and conservator's performance. Multiple studies have attempted to collect state-level data to inform a national picture of the volume and type of these cases in the United States (Schauffler & Uekert, 2008, CEC Results of Online Survey, 2010, Uekert & Van Duizend, 2011, Uekert & Schauffler, 2014). Each effort highlights the lack of information available. Without consistent data, it is impossible to enumerate incidents of exploitation or fraud and understand root causes. In November 2016, the U.S. Government Accountability Office (GAO) released a report documenting the lack of this state-level information on guardianship abuses. As stated in the title of the report, "[t]he extent of abuse by guardians is unknown" (GAO-17-33, 2016). The report goes on to explain that there is "limited data on the numbers of guardians serving older adults, older adults in guardianships, and cases of elder abuse by a guardian" (p. 6).

Recommendations have called for improving data collection through clear definitions and consistent methodology (CCJ/COSCA Resolution 14, Encouraging Collection of Data on Adult Guardianship, Adult Conservatorship, and Elder Abuse Cases by All States, 2009; National Probate Court Standards, 2013). However, resource constraints, locally governed courts, and outdated paper or legacy systems for tracking results in many states unable to confidently report the most basic statistics on the number of guardianship and conservatorship cases under court oversight. More specific information regarding the number of cases where there are concerns of exploitation or maltreatment are even more elusive. Tragic media stories and national attention have brought this issue front and center. State courts are responding with multiple states are making concerted efforts to improve the collection of data and the corresponding monitoring practices. At this critical time, this report provides guidance on recommended data elements and the context for why collecting this information is critical.

>> Using this Report

Multiple efforts such as the [Court Statistics Project](#) and the [National Open Court Data Standards](#) provide frameworks for data collection, with a goal of presenting a national picture (CSP) or working to standardize information to be able to promote data exchanges for research (NODS). This report is a complement to these other efforts and uses the NODS framework and recommended data elements as a starting point. The report is divided into sections that align with the NODS organizational structure. Each section describes relevant data elements, providing additional context for the importance and policy need for collecting the data (e.g., Are elder guardianship/conservatorship cases increasing as the state's elder population increases? Was a conservator convicted of fraud also appointed conservator for other cases, in other counties?).

Not every data element from the NODS standards is included in this report. Priority is given to those elements that are specific to guardianships and conservatorships and need more context or explanation on the "how and why" for collection. Additional elements that are out of scope for NODS are included in this report. For easy reference, each section is labeled with the NODS tab number. Additionally, NODS data elements are in bold. Sample values from the NODS data elements spreadsheet are italicized. Elements out of scope for NODS but included in this guide for case-level monitoring at the local court level are denoted with an asterisk (*).

This report does not outline every data element necessary for case management. Instead, the list aims to provide a guide for what data should be collected and initiate the conversation of what information is needed to answer policy and monitoring questions. The list is informed by past research, site visits, and discussion from the field and current practice. However, it may not cover all needs for a court or state. This report should be viewed as a living document. Recommendations will change, especially as courts incorporate technology solutions more fully.

¹ In this report the term guardian is used to reference those appointed to make personal/well-being decisions and conservator is used to reference those appointed to make financial decisions. Local use of these terms varies widely.

>> Principles of data collection

There are a few principles that guide data collection around monitoring guardianship/conservatorship cases as these have some unique characteristics from other civil cases. The data elements included in this report attempt to address these factors.

It is necessary and important to collect information on changes over the life of case.

Guardianship/conservatorship cases may remain under the court's watch for decades, with the needs of the protected person changing over time. It is unlikely that a guardianship or conservatorship case open for many years will have a single judicial officer. Maintaining historical data is key, as well as being able to look at the current needs versus what was originally presented. For example, what power was requested in the petition versus what power is granted? Are some of the powers no longer necessary or are additional ones needed? Who was the original conservator and why was that conservator removed?

Courts need data to identify problems and responses to those problems.

In some guardianship and conservatorship cases, problems arise due to abuse, neglect, fraud, or mismanagement. Having accurate data increases the chances that courts will become aware of and respond appropriately to problems, identify trends or patterns, and improve the protection of vulnerable citizens.

To protect individuals subject to guardianships or conservatorships, courts must communicate with other courts and other entities.

Both those subject to a guardianship/conservatorship as well as those serving as guardians or conservators cross jurisdictional, county, and state lines. Being able to share data and exchange information is critical to detect and prevent abuse and fraud.

DATA ELEMENTS

Tab 1: Case Information

>> Probate Case Types

Understanding a court's current guardianship/conservatorship caseload is basic but critical information. For each case, three pieces of information should be known. Ideally this information would be collected at filing of the petition and again after adjudication (when the guardian/conservatorship is granted.)

1. Type (Guardianship, Conservatorship, or Both)
2. Age of Vulnerable Person (Adult or Juvenile)
3. Powers granted to the guardian/conservator (Full or Limited)

In some guardianship or conservatorship cases, the court may grant type or powers different from the petition. For example, the petitioner may have sought full guardianship of an adult. Based on the facts presented, the court granted limited guardianship of an adult. In a case such as this, capturing the type and powers is important for ongoing monitoring. There are several ways to accomplish this:

1. Update the case type based on what the court actually granted, maintaining case type history (e.g. the original case type is Guardianship-Adult but the court granted only limited guardianship, so the case type is changed to Limited Guardianship-Adult).
2. If a new petition were filed, reopening the case with the appropriate case type based on the new petition, maintaining case type history.
3. Retaining the original case type, but capturing the powers granted in a separate field (e.g. the case type is Guardianship-Adult and the powers granted are "limited guardianship").

Ultimately, the goal is for the court to know the current case type and how it has changed over time.

Probate Case Type	Definition/Notes
<i>Guardianship-Adult</i>	Case establishing a legal relationship between an adult determined to be unable to make their own personal decisions and the person(s) granted powers to make those decisions. (Note: For this definition, guardianship authorizes well-being decisions, such as health care, accommodation, and education.)
<i>Guardianship-Juvenile</i>	Case establishing a legal relationship between a juvenile unable to make their own personal decisions and the person(s) granted powers to make those decisions. (Note: For this definition, guardianship authorizes well-being decisions, such as health care, accommodation, and education.)
<i>Conservatorship-Adult</i>	Case establishing a legal relationship between an adult determined to be unable to make their own financial decisions and the person(s) granted powers to make those decisions. (Note: For this definition, conservatorship authorizes financial decisions, such as selling property and managing finances.)
<i>Conservatorship-Juvenile</i>	Case establishing a legal relationship between a juvenile unable to make their own financial decisions and the person(s) granted powers to make those decisions. (Note: For this definition, conservatorship authorizes financial decisions, such as selling property and managing finances.)
<i>Both (G&C)- Adult</i>	Cases establishing a legal relationship between an adult determined to be unable to make their own personal <u>and</u> financial decisions and the person(s) granted powers to make those decisions.
<i>Both (G&C)- Juvenile</i>	Cases establishing a legal relationship between a juvenile unable to make their own personal <u>and</u> financial decisions and the person(s) granted powers to make those decisions.
<i>Limited Guardianship-Adult</i>	Cases establishing a limited legal relationship between an adult determined to be unable to make their own personal decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order (Note: For this definition, guardianship authorizes limited well-being decisions, such as health care decisions only.)
<i>Limited Guardianship-Juvenile</i>	Cases establishing a limited legal relationship between a juvenile unable to make their own personal decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order. (Note: For this definition, guardianship authorizes limited well-being decisions, such as health care only).

<i>Limited Conservatorship-Adult</i>	Cases establishing a limited legal relationship between an adult determined to be unable to make their own financial decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order. (Note: For this definition, conservatorship authorizes limited financial decisions, such as only selling property).
<i>Limited Conservatorship-Juvenile</i>	Cases establishing a limited legal relationship between a juvenile unable to make their own financial decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order. (Note: For this definition, conservatorship authorizes limited financial decisions, such as only selling property).
<i>Limited Both (G&C)-Adult</i>	Cases establishing a limited legal relationship between an adult individual determined to be unable to make their own personal <u>and</u> financial decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order.
<i>Limited Both (G&C)-Juvenile</i>	Cases establishing a limited legal relationship between a juvenile unable to make their own personal <u>and</u> financial decisions and the person(s) granted specific powers to make those decisions as outlined/specified in the petition or order.

Case Type Classification/Re-Classification Example:

Event	Probate Case Type	Notes
Petition filed for <i>Both (G/C)</i> with full powers	<i>Both (G&C)-Adult</i>	Assign based on petition filed
Judge grants a <i>Guardianship-Adult</i> , as the only income/assets known is social security and a representative payee is needed	<i>Guardianship-Adult</i>	Re-categorize case as <i>Guardianship-Adult</i> . Maintain history on the original petition type (case type).
After 2 years, Court is made aware of multiple accounts that have been inherited by vulnerable person.	<i>Both (G&C)-Adult</i>	New petition is filed, and judge orders "Both" powers to the individual. Maintain history of first petition granted.

>> Current Case Status

Guardianship/conservatorship cases are often under the court's watch for many years, so tracking the current status of the case is especially important. Historically, some courts have left cases as "open/pending" or "active" for the entire life of the case. This skews the calculation of time to disposition and makes it more difficult for the court to distinguish between cases with a petition pending and those being monitored by the court. Other courts have "closed" cases as soon as the petition is granted. This makes it difficult for the court to determine which cases require monitoring.

Status Categories:

Current Case Status	Definition
<i>Open/Pending</i>	An open case is one with a petition pending before the court.
<i>Inactive</i>	<p>An inactive case is one whose status has been administratively changed to inactive during the reporting period due to events beyond the court's control. The court can take no further action on an inactive case until an event restores the case to the court's active pending caseload.</p> <p>Note: Inactive should not be used for guardianship/conservatorship cases that are disposed/set for review. The court has authority to review annual accounting or call a hearing when concerns arise.</p>
<i>Disposed/Set for Review</i>	A case that, following an initial Entry of Judgment, is awaiting regularly scheduled reviews involving a hearing before a judicial officer. For guardianship and conservatorship cases, the status should be Set for Review if they are scheduled for administrative or audit reviews, even if they do not always result in a judicial hearing. The designation of set for review is very helpful in distinguishing between cases in which a petition is pending (open) and those that are active for the court but in which no petition is pending.
<i>Disposed/Closed</i>	<p>A case is disposed/closed if additional court action would require a new petition to be filed. For Guardianship and Conservatorship cases, this may occur because:</p> <ul style="list-style-type: none"> - the petition was denied, - the vulnerable person has died, - the juvenile under guardianship/conservatorship has reached age of majority, or - competency has been restored.

>> Filing Type

Tracking the filing type is also valuable information, as these cases may be reopened or transferred from state to state or court to court. Data that tracks the history of the case (where it came from when transferred) will be useful if there are concerns over the wellbeing of the person subject to guardianship/conservatorship. More detailed information on case statuses can be found in the Court Statistics Project, [State Court Guide to Statistical Reporting](#).

Filing Type	Notes
<i>New</i>	Case filed for the first time in the court
<i>Reopened</i>	Case where a new petition has been filed after the adjudication. This could be to change the type of powers granted (e.g., changing from a full to a limited conservatorship).
<i>Transferred</i>	Cases that originated in another court or jurisdiction.

Linked case data elements (**linked case**, **linked case jurisdiction**, and **linked case type**) can also be useful for monitoring cases, including those that are transferred using these fields to track past case numbers and case types. Linked case jurisdiction should include the originating state or

county and the originating court, which may require more than one field. For transferred cases, capturing the originating jurisdiction information allows the court to seek earlier records if needed. Additionally, as professional guardians and conservators can practice in multiple jurisdictions, this information can be used to find patterns of abuse or neglect.

Linked case data can also be used to associate cases within the same state or jurisdiction. For example, when multiple siblings or spouses are subject to guardianship/conservatorship, it may be beneficial to consider their finances and well-being together. The **linked case** data element may also be used to track related criminal cases that come from findings of abuse, neglect, or fraud. It may also be used to track related civil or family matters such as divorce.

>> Case Closure Reason

Guardianship and Conservatorship cases should only be considered closed when a final disposition is entered, and the court is no longer responsible for monitoring the case. Not only should the way the case is closed be captured (**Case Disposition Category**), it is also important to track the reason why the case is closed. This will allow courts to better understand the important subset of cases where a guardianship or conservatorship is no longer needed (restoration of rights) or when a least restrictive alternative was reached.

Case Closure Reasons:

Case Closure Reason	Notes
<i>Restoration of Rights</i>	Guardianships and Conservatorships are a last resort, and when no longer necessary, the court should restore rights.
<i>Reached Age of Majority</i>	Applicable in juvenile Guardianships and Conservatorships
<i>Death</i>	
<i>Transfer</i>	
*Transfer to State/County	For cases that are transferred to another state or jurisdiction, track where the cases go
*Transfer to Jurisdiction/Court	
<i>Order Expired</i>	Typically used for temporary orders of guardianship
<i>Dismissal</i>	
*Less Restrictive Alternative	Increasing attention is given to least restrictive alternatives for those not needing guardianship/conservatorship. Knowing the number of cases that were dismissed or closed for this reason will allow a court or state to track this trend and to illustrate guardianships or conservatorships are not being used when unwarranted. The definition and alternatives will vary from state to state, but it is important to consider how to capture this information.
Other	Ideally, other would not be needed as the more specific Closure Reasons would capture this detail. However, there may be other reasons not included.

Tab 2: Participant Information

In addition to the typical data collected for parties to a case, key data elements are needed to assist in monitoring guardianships/conservatorships. Unfortunately, demographic information is often missing from case management systems (CMS), creating problems accurately identifying the person within the CMS.

These elements are important to collect for the person subject to guardianship/conservatorship.

Data Element for the person subject to guardianship/conservatorship	Data Values	Notes
Date of Birth	date	Important for monitoring
Date of Death	date	Important if death was the reason for case closure
*Proof of Death	<ul style="list-style-type: none"> • Death certificate • Signed statement by the funeral director • Coroner's report 	
*Mailing Address		Necessary for notice and other court documents
*Residential Address		Necessary for case monitoring and investigating accusations
Residential Status	*Independent Living (Own Home)	Map to NODS data value <i>independent living</i>
	*Independent Living (Group Home)	
	*Independent Living (Family/Friend Home)	
	<i>Assisted Living</i>	
	<i>Skilled Nursing</i>	
	<i>Acute Care (Hospital, LTAC)</i>	

These elements are important to collect for the guardian or conservator. It is particularly important to be able to connect all of the clients of a professional guardian/conservator in the event that abuse or fraud are alleged.

Data Element for guardian/conservator	Data Values	Notes
*Mailing Address		Necessary for notices and other court communication
Party Opt-in to Text Notifications	Yes No	Being able to communicate to parties through electronic service will allow for automated reminders and notices to help monitor required regular submissions and reports.

Type of Electronic Service	Text message Email Telephone Social media	
Relationship of the G/C to the person	Lay (Family/Friend)	
	Professional	An individual not related to the subject of the petition and who may receive compensation for this role. This includes corporate fiduciaries and attorneys acting in this role. Because certification and professional definitions vary from state to state, this is based upon the state's definitions.
	Public	An individual or agency deemed to be an officer of the court and who may be compensated by public funds.
	*Attorney	This element captures when the attorney for the person subject to a guardianship/conservatorship is also serving in the role as guardian or conservator. This individual should also then be captured as an attorney for standard representation in the case. Map to NODS <i>Professional</i> .
	*Health Care Agency or Provider	Map to NODS <i>Professional</i> .
	*Individual Representative from the Health Care Agency of Provider	
*Qualified (met requirements to serve as a guardian)	Yes No	Although captured in NODS through dates or flags, at the party level it is important to track characteristics of the guardian/conservator along with maintaining history of those characteristics. Characteristics and definitions will vary by state, however being able to run a report on conservators who were certified, etc. will allow the court to follow up on guardians/conservators of concern. Dates for when certifications expire should also be captured.
*Certified	Yes No	
Date of Guardian/Conservator registration	date	
Rep Payee Flag	Yes No	Indication that a guardian or conservator is also serving as a representative payee for Veterans Affairs or Social Security. If a guardian or conservator is discharged for cause, SSA and/or the VA should be notified (and vice versa). Although there is no current formal data sharing between state courts and the federal agencies, having a way to track this when known is key.

Tab 3: Attorney and Advocate Information

To monitor these cases, it is important to know what attorneys and advocates are involved and which events they attend. Attorney fees, especially when an attorney is serving multiple roles, need to be monitored to ensure billing rates are appropriate for the tasks performed (see Probate Review and Monitoring Section). Being able to identify and run reports on the multiple actors involved in a case will allow for cross case monitoring when issues arise.

Advocate Type

Data Element	Values	Notes
Advocate Type	CASA/Non-attorney GAL	A non-attorney GAL is someone appointed to represent the best interests of an individual.
	Court Visitor	Individual appointed by the court to investigate the well-being or living situation of the person subject to guardianship.
	Other	

Tab 4: Status

For guardianship and conservatorship cases, being able to distinguish which cases are under the court's watch is critical, and historically a challenge for courts to distinguish pending caseloads from those that are Set for Review. Courts have come up with a variety of methods to mark these cases, and many terms are used (e.g., Administratively Closed, Statistically Closed, Adjudicated Case- Report Review). Regardless of terminology used, what is key is to be able to distinguish cases that are:

- Open/Pending
- Disposed and Set for Review
- Disposed/Closed.

See Case Section for more detail and definitions on these Case Statuses.

If a new petition is filed, such as when an old guardian is discharged and a new one appointed, the case status will change from disposed and set for review to reopened, which is mapped to open status in the NODS data elements. The case status of reopened or open indicates that there is a petition pending. Once that petition is adjudicated, the status will revert to disposed and set for review.

Tabs 5 & 6: Pleadings/Motions and Filings

Information valuable to courts in tracking and monitoring guardianships is all-too-often buried in the text of pleadings or in docket notes. While these are useful when reviewing a particular case, they do not allow a court to receive a holistic view of the docket or look for patterns in abuse, neglect, or financial exploitation. These data fields are important to capture complaints or concerns about guardianships.

Data Element	Values relevant to guardianships and conservatorships	Notes
Pleading Title	Text field	
Motion/Filing Title		
Date Filed		
Filing Party		

Answer	Y/N	
Amended	Y/N	
Initial Probate Pleading Type	<i>Emergency/Temporary/Special</i>	Used when the need for a guardianship or conservatorship is immediate.
	<i>General/Summary</i>	
	<i>Successor</i>	Used
	<i>Limited</i>	Used when only a limited guardianship or conservatorship is sought.
Initial Probate Pleading Reason	<i>Medical Condition</i>	This data element allows for tracking the underlying reason for the guardianship/ conservatorship.
	<i>Financial Exploitation</i>	
	<i>Disability</i>	
	<i>Abuse</i>	
	<i>Neglect/Abandonment</i>	
	<i>Substance Abuse</i>	
	<i>Other</i>	
Subsequent Probate Pleading Type	<i>Contested Issue</i>	
	<i>Responsive Pleading</i>	
	<i>Hearing/request/notice</i>	
	*Modification	These will be mapped to <i>modification/ termination/successor</i> in NODS, but courts are likely to find it helpful to be able to split them out.
	*Termination	
	*Successor	
	<i>Bond</i>	
<i>Other</i>		
Subsequent Probate Pleading Reason	<i>Restoration</i>	Used when the pleading is to restore the protected person's rights
	<i>Financial Exploitation</i>	Used to track the type of concerns necessitating court action. The reason is important to track malfeasance
	<i>Abuse</i>	
	<i>Neglect/Abandonment</i>	
	<i>Substance Abuse</i>	
	<i>Fees and Costs</i>	
	<i>Modification/Change in Guardianship or Conservatorship</i>	
	<i>Death/Incapacity/No longer Willing</i>	Used when the current guardian or conservator can no longer serve
	<i>Other</i>	

Pleading/Motion Outcome	Granted (full, partial)	
	Denied	
	Dismissed/withdrawn	

Tab 7: Hearings & Events

The data elements for hearings and events allow courts to capture important questions including the flow of the case (based on **scheduled event date**, **hearing/event outcome** (whether it was *held*, *continued*, *cancelled*, or *postponed/rescheduled*), and **continuance/postponement reason**. These elements also capture some aspects of procedural fairness, including **parties present**, **attorneys/advocates present**, and **interpreter present** as well as the **hearing/event modality** to capture if the hearing occurred *in-person*, via *videoconference*, or *telephonically*.

Tab 8: Orders

Court actions are captured through orders, and these can be in response to pleadings, hearings, events, or monitoring activity. Important data in orders is often captured in notes fields or case file attachments which are difficult to access. Working to standardize the collection of this information will improve monitoring. In this data model, orders are the assumed method for capturing outcomes from hearings and pleadings. Recording the **probate order type** provides valuable information about the events of the case and the NODS project includes the following, grouped by the likely stage of the case.

Pre-appointment

- Order for background check
- Order for credit checks
- *Order to obtain Bond
- *Order to [meet state-specific certification/qualification requirements]

Appointment

- Order/Letters/Judgment of Appointment of Guardian
- Order/Letters/Judgment of Appointment of Conservator
- Order/Letters/Judgment of Appointment of Guardian & Conservator

Review/Monitoring

- Order for repayment
- Order to surcharge Bond
- Order to modify Bond
- Order approving sale of assets
- Order to show cause
- Order suspending fiduciary/guardian
- Order appointing investigator/auditor
- Order removing fiduciary/guardian
- Order for Competency Restoration
- Order for Reinstatement
- Order Appointing Successor
- Order for Evaluation
- Order for Treatment
- Order for Hospitalization/Civil Commitment

In cases where a warrant is necessary, the relevant data fields are:

- **Warrant Issued**
- **Warrant Returned**
- **Warrant Reason**

Because many probate orders require action on the part of the guardian or conservator, jurisdictions might also find it helpful to capture the following elements, tied to a specific order:

- *Order Deadline: the date by which an action is to be completed
- *Order Met: whether the guardian/conservator complied with the order

The **result** of the order simply indicates if it was *granted*, *granted in part*, or *denied*. The NODS data elements also include **service ordered**, **service type**, **service party**, **evaluation ordered**, **evaluation type**, **evaluation party**, and **service/evaluation outcome**.

Tab 15: Probate Review and Monitoring

Having data that captures the review and monitoring process is essential, but often happens without official court documents, or may not get entered into a data system. However, for a court to establish automated reminders to guardians and conservators and to track compliance with reporting requirements, capturing these data elements is essential.

>> Establishing the baseline

Courts need to have a clear picture of the health and well-being of the person subject to guardianship/conservatorship as well as the assets of that individual at the start of the case.

- **Inventory Due Date**
- **Inventory Filed Date**
- **Financial Assets Value at Appointment**
- **Personal Property Value at Appointment**
- **Real Property Value at Appointment**
- **Total Assets Value at Appointment**
- **Qualification date** (of the conservator or guardian)

Once the initial inventory is submitted, maintaining the values as of the appointment date will allow for analysis on how the current values compare. If new or additional assets that were not initially reported come to light, an amended inventory should be submitted, and these data updated to show the correct figures.

In addition to the data elements identified in the NODS project, some courts also find having the following:

- *Budget/Financial Plan
- *Fee Cost Schedule

Capturing a budget or financial plan and a schedule of the fees and costs charged by the guardian or conservator allows the court to compare the annual accounting to the submitted budget and fees. This will be helpful for those auditing the records by hand and for courts using machine learning and/or financial monitoring services.

>> Monitoring

Courts also monitor the well-being of the individual under guardianship or conservatorship in addition to the assets.

- **Well-being Report Due Date**
- **Well-being Report Filed Date**
- *Care Plan
- **Current Financial Assets Value**
- **Current Personal Property Value**

- **Current Real Property Value** (may be broken down by in-state/out-of-state)
- **Current Total Assets Value**
- **Accounting Due**
- **Accounting Filed**
- **Event Reminder** (date)
- **Reminder type** (*inventory, annual accounting, annual well-being report, other*)

In some jurisdictions, courts may waive some reporting requirements. This must be tracked so that guardians/conservators are not ordered to show cause why they have not submitted waived reports.

- **Waiver**
- **Waiver Reason**
 - *court*
 - *document (parties, will)*
 - *statutory*
- *Extensions granted

Finally, courts must be able to track when concerns are brought to the court.

- **Concern Activity Date**
- **Complaint Source**
- **On-site Review**

When the court orders an audit or other activity, those should also be tracked.

- *Audit Due
- *Audit Filed
- *Audit Finding



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