



City of Isanti Data Practices Procedures and Data Inventory

Data Practices Procedures

Table of Contents

- 1.0 Introduction.
- 2.0 Responsible Authority.
- 3.0 Access to Public Data.
 - 3.1 People Entitled to Access.
 - 3.2. Form of Request.
 - 3.3 Identification of Requesting Party.
 - 3.4 Form of Copies.
 - 3.5 Time Limits (Public Data).
 - 3.6 Fees.
- 4.0 Access to Private and Confidential Data on Individuals.
 - 4.1 People Entitled to Access.
 - 4.2 Form of Request.
 - 4.3 Requests for Private or Confidential Information.
 - 4.4 Identification of Requesting Party.
 - 4.5 Time Limits.
 - 4.6 Fees.
 - 4.7 Summary Data.
 - 4.8 Records of Minors and Incapacitated Persons.
- 5.0 Access to Private and Confidential Data on Decedents.
- 6.0 Access to Data Not On Individuals.
 - 6.1 People Entitled to Access.
 - 6.2 Form of Request.
 - 6.3 Form of Request (Nonpublic or Protected Nonpublic Information).
 - 6.4 Identification of Requesting Party.
 - 6.5 Time Limits.
 - 6.6 Fees.
 - 6.7 Accessibility of Records.
- 7.0 Temporary Classification.
- 8.0 Denial of Access.
- 9.0 Collection of Data on Individuals.
 - 9.1 Tennessen Warning.
 - 9.2 Data Quality Procedures.
- 10.0 Challenges to Data Accuracy or Completeness.
- 11.0 Data Protection.
 - 11.1 Accuracy and Currency of Data.
 - 11.2 Data Safeguards/Ensuring Security of Not Public Data.
 - 11.3 Procedures for Breaches in Security.
 - 11.4 Penalties for Unlawfully Accessing Not Public Data.

City of Isanti
Data Practices Procedures Exhibits

Exhibit 1 LIST OF DESIGNEES
Exhibit 2 ANNUAL FEE SCHEDULE
Exhibit 3 INFORMATION DISCLOSURE REQUEST
Exhibit 4 GOVERNMENT DATA ACCESS & NONDISCLOSURE AGREEMENT
Exhibit 5 NOTICE TO PERSONS UNDER AGE 18
Exhibit 6 SAMPLE CONSENT TO RELEASE PRIVATE DATA
Exhibit 7 SAMPLE CONSENT TO RELEASE COPYRIGHTED DATA
Exhibit 8 DATA PRACTICES ADVISORY
Exhibit 9 SAMPLE TENNESSEN WARNING FORM
Exhibit 10 SAMPLE CONTRACT PROVISION
Exhibit 11 BUILDING PERMIT/PLANS - DATA PRACTICES ADVISORY

Appendix A

DATA INVENTORY

DATA PRACTICES PROCEDURES

1.0 Introduction. These procedures are adopted to comply with the requirements of the Minnesota Government Data Practices Act (the “Act”), specifically Minnesota Statutes Sections 13.025, 13.03, subdivision 2 and 13.05, subdivision 5. It is the intent of the City of Isanti (“City”) to remain in compliance with the Act. These procedures shall be supplemented by the requirements of the Act as needed and if any procedure contained herein is inconsistent with those requirements, as they may be amended, the specific provisions of the Act shall be controlling.

2.0 Responsible Authority. The Manager is the Responsible Authority and Compliance Official responsible for the collection, use and distribution of government data and is accountable for City compliance with the Minnesota Government Data Practices Act. The Responsible Authority has authorized certain other City employees to collect, maintain, disseminate and otherwise assist in complying with the Act (“Designees”). These Designees are listed on attached **Exhibit 1**. The Responsible Authority shall provide training to Designees and staff at such times and in such a manner as the designated Responsible Authority determines is appropriate to inform them of their obligations under the Act. The designated Responsible Authority shall also be authorized to amend or supplement the Exhibits attached to these procedures as needed to further the intent of these procedures and the City’s compliance with the Act. For the purposes of carrying out these procedures, the term Responsible Authority shall include Designees unless the context in which it is used indicates a different intent.

3.0 Access to Public Data. All information maintained by the City is public unless there is a specific statutory designation which gives it a different classification. Categories of classification are as follows:

Data on Individuals* M.S. § 13.02, subd. 5	Data on Decedents M.S. § 13.10, subd. 1	Data not on Individuals* M.S. § 13.02, subd. 4
Public Accessible to anyone M.S. § 13.02, subd. 15	Public Accessible to anyone M.S. § 13.02, subd. 15	Public Accessible to anyone M.S. § 13.02, subd. 14
Private Accessible to the data subject; Not accessible to the public M.S. § 13.02, subd. 12	Private** Accessible to the representative of the decedent; Not accessible to the public M.S. § 13.10, subd. 1(b)	Nonpublic Accessible to the data subject; Not accessible to the public M.S. § 13.02, subd. 9
Confidential Not accessible to the data subject; Not accessible to the public M.S. § 13.02, subd. 3	Confidential** Not accessible to the representative of the decedent; Not accessible to the public M.S. § 13.10, subd. 1(a)	Protected Nonpublic Not accessible to the data subject; Not accessible to the public M.S. § 13.02, subd. 13

* Individual is defined at M.S. § 13.02, subd. 8. Individual means a living human being. It does not mean any type of entity created by law, such as a corporation.

** Private and confidential data on decedents become public data ten years after the death of the data subject and 30 years after the creation of the data.

3.1 People Entitled to Access. Any person has the right to inspect or view public data and/or to have an explanation of the meaning of the data. The person does not need to state his or her name or give the reason for the request, unless a statute specifically authorizes the City to request such information. Additionally, any person has the right to obtain a copy of public data except in the case of copyrighted materials in the possession of the City for which the City does not have express written permission to reproduce. See **Exhibit 7**.

3.1A Copyrighted public documents may be shown to anyone but shall not be reproduced or photocopied without express written permission from the copyright holder. See **Exhibit 7**.

3.1A1 The Responsible Authority reserves the right to refuse to provide copies of copyrighted data in accordance with the copyright law of the

United States (Title 17, United States Code) which governs the making of photocopies or other reproductions of copyrighted material.

3.1A2 Public documents created by the City of Isanti and/or its officials and employees on behalf of the City do not qualify for copyright protection and shall be available for viewing and reproduction in accordance with the Act. In certain cases, the City may enforce a copyright or acquire a patent for a computer software program or components of a program created by the City. In such cases, the data shall be treated as trade secret information.

3.2. Form of Request. The request for public data generally requires a written request on a form provided by the City, and sending it by email, U.S. mail, or by hand-delivering it to the City. See **Exhibit 3**.

3.3 Request for Clarification. If the data request is unclear, the City may ask for clarification. If the request yields voluminous data, the City may ask if there is more specific data sought by the requestor. However, if the requestor chooses not to limit its request, the City will respond to the original data request.

3.3 Identification of Requesting Party. The Responsible Authority **may not** require the requesting party to provide identification to view public documents except as may be necessary to facilitate access to the data. Examples of when identifying information may be requested include, but are not limited to, obtaining a mailing address when the person has requested that copies be mailed, requesting identification when copies have been paid for by check, or requesting contact information in order to clarify or follow up on the request. The Responsible Authority must verify the identity of the requesting party as a person entitled to reproductions when reproductions of copyrighted public data are requested. Identity can be established through personal knowledge, presentation of photo identification, comparison of the data subject's signature on a consent form with the person's signature in City records, or other reasonable means.

3.4 Form of Copies. Where public data is maintained in a computer storage medium, the Responsible Authority shall provide copies of the public data in electronic form upon request, provided a copy can reasonably be made in that form. The Responsible Authority is not required to provide the data in an electronic format or program that is different from the format or program in which the Responsible Authority maintains the data.

3.5 Time Limits (Public Data). Requests will be received and processed only at Isanti City Hall during normal business hours. If copies cannot be made at the time of the request, copies will be supplied as soon as reasonably possible. Whenever possible, the Responsible Authority will immediately allow the person to inspect the public data. When providing an immediate response to the customer it should not interfere with the City's efficient operations. The Responsible

Authority may require that the requesting person make an appointment or return at a later time to inspect or to pick up copies of the requested data.

When public data on individuals is requested by the individual data subject and an immediate response is not possible, the authorized City employee will provide the data within ten days of the date of the request, excluding Saturdays, Sundays and legal holidays.

3.6 Fees. Anyone may inspect or view public data for any reason without charge. Fees may be charged only if the requesting person asks for a copy or electronic transmittal of the data. Fees will be charged according to the City's current fee schedule and may not include time necessary to separate public from non-public data. Prepayment of fees prior to receiving the copies is mandatory. In some situations, the City may also ask for a refundable deposit prior to copying data if the actual cost of providing copies may result in a large fee. Fees are established annually by ordinance. Information regarding the City's approved feeschedule is attached in **Exhibit 2**.

4.0 Access to Private and Confidential Data on Individuals. Information about individual people is classified by law as public, private, or confidential. An inventory of the private and confidential information maintained by the City is contained in **Appendix A**.

4.1 People Entitled to Access.

4.1A Public information about an individual may be shown or given to anyone for any reason.

4.1B Private information about an individual may be shown or given to:

4.1B1 The individual, but only once every six months, unless a dispute has arisen or additional data has been collected or created.

4.1B2 A person who has been given access by the express written consent of the data subject. See **Exhibit 6**.

4.1B3 People, or another responsible authority, which are authorized access by federal or state law or by court order.

4.1B4 People within the City staff, the City Council, and outside agents (such as attorneys, insurance agents, etc.) whose work assignments or responsibilities reasonably require access.

4.1C Confidential information may not be given to the subject of the data, but may be given or shown to:

4.1C1 People who are authorized access by federal or state law or by court order.

4.1C2 People within the City staff, the City Council, and outside agents (such as attorneys, insurance agents, etc.) whose work assignments or responsibilities reasonably require access.

4.2 Form of Request. The data request generally requires a written request on a form provided by the City, and sending it by email, U.S. mail, or by hand-delivering it to the City. See **Exhibit 3**. Data will be released depending on whether or not the City has stored the data requested and whether the data is classified as public, private, or confidential.

4.3 Requests for Private or Confidential Information. All requests to see private or confidential information must be made in writing in order to verify identity. The Responsible Authority will provide a form. See **Exhibit 3**. to document the requesting party's identity, the information requested, and the City's response; however, any individual may request data verbally or in writing as long as the request is accompanied by documentation providing the requesting party's identity and a detailed description of the information requested.

4.4 Identification of Requesting Party. The Responsible Authority **must** verify the identity of the requesting party as a person entitled to access when private or confidential data is requested. Identity can be established through personal knowledge, presentation of photo identification, comparison of the data subject's signature on a consent form with the person's signature in City records, or other reasonable means.

4.5 Time Limits. Requests will be received and processed at Isanti City Hall only during normal business hours. Access to the data will be provided as soon as is reasonably possible. Data requested by the individual data subject will be provided within ten days of the date of the request, excluding Saturdays, Sundays and legal holidays if an immediate response is not possible.

4.6 Fees. Fees will be charged in the same manner as for public information and are summarized in **Exhibit 2**.

4.7 Summary Data. The term summary data refers to statistical records and reports derived from data on individuals but which does not identify an individual by name or reveal any other characteristic that could uniquely identify an individual. Summary data derived from private or confidential data is public. The Responsible Authority will prepare summary data upon request, if the request is in writing and the requesting party pays for the cost of preparation. The Responsible Authority must notify the requesting party about the estimated costs and collect these costs before preparing or supplying the summary data. This should be done within 10 days after receiving the request. If the summary data cannot be prepared

within 10 days, the Responsible Authority must notify the requester of the anticipated time schedule and the reason for the delay.

Summary data may be prepared by “blacking out” personal identifiers, cutting out portions of the records that contain personal identifiers, creating a spreadsheet, programming computers to delete personal identifiers, or other reasonable means.

The Responsible Authority may ask an outside agency or person to prepare the summary data if (1) the specific purpose is given in writing (2) the agency or person agrees not to disclose the private or confidential data, and (3) the Responsible Authority determines that access by this outside agency or person will not compromise the privacy of the private or confidential data. See **Exhibit 4**.

4.8 Records of Minors and Incapacitated Persons as defined in Minnesota Statutes § 524.5-102, subdivision 6. The following applies to private (not confidential) data about people under the age of 18 and about those persons who are incapacitated as defined by Minnesota Statutes § 524.5-102, subdivision 6.

4.8A Parent/Guardian Access. In addition to the people listed above who may have access to private data, a Parent may have access to private information about a minor or incapacitated person. For the purposes of these procedures, “Parent” shall include guardians and individuals acting as parents or guardians in the absence of parents or guardians. A Parent is presumed to have this right unless the minor has requested the Responsible Authority to withhold the data and withholding the data would be in the best interest of the minor, or unless the Responsible Authority has been given evidence that there is a state law, court order, or other legally binding document, that restricts the Parent’s exercise of this right.

4.8B Notice to Minor and Incapacitated Persons. Before requesting private data from minors or incapacitated persons, City personnel must notify the minors and incapacitated persons that they may request that the information not be given to their parent or guardian(s). See **Exhibit 5**.

4.8C Denial of Parent or Guardian Access. The Responsible Authority may deny parent or guardian access to private data when the individual requests this denial and the Responsible Authority determines that withholding the data would be in the best interest of the individual. The request from the individual must be in writing, stating the reasons for the request. In determining the best interest of the individual, the Responsible Authority will consider:

4.8C1 Whether the individual is of sufficient age and maturity to explain the reasons and understand the consequences,

4.8C2 Whether denying access may protect the individual from physical or emotional harm,

4.7C3 Whether there are reasonable grounds to support the individual's reasons, and

4.8C4 Whether the data concerns medical, dental, or other health services provided under Minnesota Statutes Sections 144.341 to 144.347. If so, the data may be released only if failure to inform the parent or guardian would seriously jeopardize the health of the individual.

The Responsible Authority may also deny parental access without a request from the juvenile or incapacitated person under Minnesota Statutes Section 144.335, or under any other state or federal statute that allows or requires denial of parental access and that provides standards for denying parental access.

5.0 Access to Private and Confidential Data on Decedents. Private data on decedents means data which, prior to the death of the data subject, were classified by statute, federal law, or temporary classification as private data. Confidential data means data which, prior to the death of the data subject, were classified by statute, federal law, or temporary classification as confidential data. An Inventory of the private and confidential information maintained by the City is contained in **Appendix A**. Information about individuals who are deceased will be treated the same as data that is about individuals who are living except:

5.0A Private and confidential data on decedents will become public data ten years after the death of the data subject **and** 30 years after the creation of the data in accordance with Minnesota Statutes Section 13.10, subdivision 2. An individual is presumed dead if either 90 years elapsed since the creation of the data or 90 years have elapsed since the individual's birth, whichever is earlier, except that an individual is not presumed to be dead if the Responsible Authority has information readily available to it indicating the individual is still living.

5.0B A representative of the decedent may exercise the rights that the decedent could have exercised as a living individual. A "representative of the decedent" means a personal representative of the estate of the decedent during the period of administration, or if no personal representative has been appointed or after discharge, the surviving spouse, any child of the decedent, or, if there is no surviving spouse or children, the parents of the decedent.

6.0 Access to Data Not On Individuals. Information not about individuals is classified by law as public, nonpublic, and protected nonpublic. Information that is not about individuals will generally be treated the same as data about individuals. Nonpublic and

protected nonpublic information, except for security information, becomes public either ten years after it was created by the City or ten years after the data was received or collected by the City unless the Responsible Authority reasonably determines that if the information was made public or made available to the data subject that the harm to the public or the data subject would outweigh the benefit to the public or the data subject.

6.1 People Entitled to Access.

6.1A Public information not about an individual may be shown to anyone. Copyrighted documents will not be reproduced or photocopied without express written permission from the copyright holder. See **Exhibit 7**.

6.1B Nonpublic information not about an individual may be shown or given to:

6.1B1 An authorized representative of the subject entity of the data, but only once every six months, unless a dispute has arisen or additional data has been collected.

6.1B2 A person who has been given access by the express written consent of the authorized representative of the entity which is the subject of the data. See **Exhibit 6**.

6.1B3 People who are authorized access by federal or state law or by court order.

6.1B4 People within the City staff, the City Council, and outside agents (such as attorneys, insurance agents, etc.) whose work assignments or responsibilities reasonably require access.

6.1C Protected Nonpublic information may not be given to the authorized representative of the entity, but may be given or shown to:

6.1C1 People who are authorized access by federal or state or by court order.

6.1C2 People within the City staff, the City Council, and outside agents (such as attorneys, insurance agents, etc.) whose work assignments or responsibilities reasonably require access.

6.2 Form of Request. The data request generally requires a written request on a form provided by the City, and sending it by email, U.S. mail, or by hand-delivering it to the City. See **Exhibit 3**. Data will be released depending on whether or not the City has stored the data requested and whether the data is classified as public, nonpublic, protected nonpublic or is copyrighted.

6.3 Form of Request (Nonpublic or Protected Nonpublic Information). All requests to view or receive a reproduction of nonpublic or protected nonpublic information must be made in writing in order to verify identity. All requests to receive a reproduction of copyrighted public, nonpublic or protected nonpublic information must be made in writing in order to determine if the request for copyrighted material qualifies for release under copyright law of the United States (Title 17, United States Code.) The Responsible Authority will provide a form , **Exhibit 3**, to document the requesting party's identity, the information requested, and the City's response; however, any person may request data verbally or in writing as long as the request includes documentation of the requesting party's identity and a detailed description of the information requested.

6.4 Identification of Requesting Party. The Responsible Authority must verify the identity of the requesting party as a person entitled to access when nonpublic or protected nonpublic data is requested. The Responsible Authority must also verify the identity of the requesting party as a person entitled to access when copies of copyrighted private, nonpublic, or protected nonpublic data is requested. Identity can be established through personal knowledge, presentation of photo identification, comparison of the data subject's signature on a consent form with the person's signature in City records, or other reasonable means.

6.5 Time Limits. Requests will be received and processed at Isanti City Hall only during normal business hours. The response must be immediate, if possible, or prompt and reasonable, if an immediate response is not possible.

6.6 Fees. Fees will be charged in the same manner as for public information and are summarized in **Exhibit 2**.

6.7 Accessibility of Records. Upon request by an individual, records must be made available within a reasonable time period to persons with disabilities in a manner consistent with state and federal laws prohibiting discrimination against persons with disabilities. Reasonable modifications must be made in any policies, practices and procedures that might otherwise deny equal access to records to individuals with disabilities. This requirement does not apply to (1) technology procured or developed prior to January 1, 2013, unless substantially modified or substantially enhanced after January 1, 2013 or (2) records that cannot be reasonably modified to be accessible without an undue burden as defined in Minnesota Statutes Section 16E.015, subdivision 4 to the public entity or (3) except as otherwise provided in Minnesota Statutes Chapter 16E.

7.0 Temporary Classification. If the Responsible Authority determines information not expressly classified by law should be protected, the Responsible Authority may apply to the Department of Administration Commissioner for permission to classify information as private, confidential, nonpublic or protected nonpublic for its own use and for the use of other governmental entities on a temporary basis. The application and the classification of the information shall be in accordance with Minnesota Statutes Section 13.06.

8.0 Denial of Access. If the Responsible Authority determines that the requested data is not accessible to the requesting party, the Responsible Authority must inform the requesting party verbally at the time of the request or in writing as soon after that as possible. The Responsible Authority must give the specific legal authority, including statutory section, for withholding the data. The Responsible Authority must place a verbal denial in writing upon request. This must also include the specific legal authority for the denial.

9.0 Collection of Data on Individuals. The collection and storage of information about individuals will be limited to that necessary for the administration and management of the programs specifically authorized by the state legislature, City Council, or federal government.

9.1 Tennessean Warning. When an individual is asked to supply private or confidential information about the individual, the City employee requesting the information must give the individual a Tennessean warning. See **Exhibit 8; Exhibit 9.**

9.1A This warning must contain the following:

9.1A1 The purpose and intended use of the requested data,

9.1A2 Whether the individual may refuse or is legally required to supply the requested data,

9.1A3 Any known consequences from supplying or refusing to supply the information, and

9.1A4 The identity of other persons or entities authorized by state or federal law to receive the data.

9.1B A Tennessean warning is not required when:

9.1B1 An individual is requested to supply investigative data to a law enforcement officer;

9.1B2 The data subject is not an individual (e.g., the data subject is a corporation or partnership);

9.1B3 The data subject offers information that has not been requested by the City;

9.1B4 The information requested from the individual is about someone else;

9.1B5 The City receives information about the subject from someone else; or

9.1B6 The information requested from the subject is classified as public data.

9.1C A Tennessee warning may be on a separate form (**Exhibit 9**) or may be incorporated into the form which requests the private or confidential data.

9.1D Collection of Data on Individuals through the Use of the City's Computer. When an individual gains access to government information or services through the City's computer, the City may create, collect, or maintain electronic access data or use its computer to install a cookie on an individual's computer. The City must inform individuals gaining access to the City's computer of the creation, collection, or maintenance of electronic access data or the City's use of cookies before requiring the individual to provide any data about the individual to the City. As part of that notice, the City must inform the individual how the data will be used and disseminated. Notwithstanding an individuals' refusal to accept a cookie on its computer, the City must allow the individual to gain access to data or information, transfer data or information, or use government services by means of the City's computer.

9.2 Data Quality Procedures. The City is required to establish procedures to ensure that data on individuals are accurate, complete and current. The Responsible Authority shall work with employees that collect, use, or disseminate data on individuals to implement the following procedures:

9.2A At the time that data is collected from the individual data subject, the individual should be advised of his or her right to review and contest the accuracy or completeness of public or private data concerning him/herself.

9.2B An individual data subject should be encouraged to review his/her file for accuracy, completeness and currency.

9.2C Whenever possible and practical, collect data about an individual from the individual subject of the data rather than from third parties (e.g., birthdate, address, etc.). (This directive does not prohibit employees from collecting data from third parties.)

9.2D Design forms to collect objective types of data elements whenever possible, rather than data which calls for an opinion or conclusion or other subjective entry. Forms for the collection of data on individuals should request only necessary data.

9.2E Department heads should periodically review forms used to collect data on individuals. Data elements that are not necessary or that lend themselves to ambiguity or subjectivity should be removed and the forms redesigned.

9.2F Department heads should periodically conduct quality/validity check on sample case files that contain data on individuals.

10.0 Challenge to Data Accuracy or Completeness. An individual who is the subject of public or private data may contest the accuracy or completeness of that data maintained by the City. The individual must notify the City's Responsible Authority in writing describing the nature of the disagreement. Within 30 days, the Responsible Authority must respond and either (1) correct the data found to be inaccurate or incomplete and attempt to notify past recipients of inaccurate or incomplete data, including recipients named by the individual, or (2) notify the individual that the authority believes the data to be correct.

An individual who is dissatisfied with the Responsible Authority's action may appeal to the Commissioner of the Minnesota Department of Administration, using the contested case procedures under Minnesota Statutes Chapter 14. The Responsible Authority will correct any data if so ordered to do so by the Commissioner.

11.0 Data Protection.

11.1 Accuracy and Currency of Data.

11.1A All employees will be requested, and given appropriate forms, to provide updated personal information to the appropriate supervisor, City Administrator, City Clerk, or Finance Director, which is necessary for tax, insurance, emergency notification, and other personnel purposes. Other people who provide private or confidential information will also be encouraged to provide updated information when appropriate.

11.1B Department heads should, on a yearly basis, review forms used to collect data on individuals to delete items that are not necessary and to clarify items that may be ambiguous.

11.1C All records must be disposed of according to the State of Minnesota General Records Retention Schedule.

11.2 Data Safeguards/Ensuring Security of Not Public Data. The City has established the following procedures to ensure appropriate access to not public data:

11.2A Data Inventory. Pursuant to Minn. Stat. §13.025, subd. 1, the City has a Data Inventory that identifies and describes all not public data on individuals maintained by the City. See **Appendix A**. To comply with Minn. Stat. §13.05, subd. 5, the City has modified its Data Inventory to represent the employees who have access to not public data.

11.2B In the event of a temporary duty as assigned by the City Administrator or Supervisor, an employee may access certain not public data, for as long as the work is assigned to the employee.

11.2C In addition to those employees listed in the Inventory, the Responsible Authority/Compliance Officer (City Administrator, City Clerk), Data Practices Designee, City Councilmembers, City Attorney, or specific City agent may have access to all not public data maintained by the City for specified duties. Any access to not public data will be strictly limited to the data on an as-needed basis and only as necessary to complete the work assignment.

11.2D Employee position descriptions and job responsibilities.

Position descriptions may contain provisions identifying any not public data accessible to the employee when a work assignment reasonably requires access. Only those employees whose job responsibilities require them to have access will be allowed access to files and records that contain private or confidential information. The City Administrator or City Clerk shall instruct these employees to:

11.2.D1 1) not discuss, disclose, or otherwise release private or confidential data to anyone other than City employees whose job responsibilities require access to the data;

11.2.D2 2) Password-protect their computers and lock their computers before leaving work stations;

11.2.D3 3) Secure no public data within locked work spaces and in locked file cabinets;

11.2.D4 4) not leave private or confidential data where non-authorized individuals might see it; and

11.2.D5 5) shred private or confidential data before discarding.

11.2E When a contract with an outside party requires access to private or confidential information, the contracting party will be required to use and disseminate the information consistent with the Act. The City must include in a written contract the language contained in **Exhibit 10** or substantially similar language.

11.2F Data Storage. Private and confidential information will be stored in files, work spaces, or databases that are not readily accessible to individuals who do not have authorized access and that will be secured

during hours when offices are closed. Private and confidential data will be kept only in City offices, except when necessary for City business. The City will limit access to shared network drives and implement password protections, where necessary, for not public data.

11.2G Appointment of Designees. To further ensure appropriate access and compliance with laws, the City Administrator, an appointed responsible authority designee, the City Clerk. See **Appendix A.**

11.2H Data Sharing with Authorized Entities or Individuals. State or federal law may authorize the sharing of public data in specific circumstances. Not public data may be shared with another entity if a federal or state law allows or mandates it. Individuals will receive notice of any sharing in applicable Tennessee warnings or the City will obtain the individual's consent. Any sharing of not public data will be strictly limited to the data necessary or required to comply with the applicable law.

11.2I Security Assessment. The City will conduct a comprehensive security assessment of any personal information maintained by the City (i.e., social security numbers, driver's license or identification numbers, and account, credit and debit card numbers along with any security code, access code or passwords that would permit access to an individual's financial account).

11.3 Procedures for Breaches in Security.

11.3A In the event of an unauthorized breach of the security of not public data, the City will follow all applicable procedures pursuant to Minn. Stat. § 13.055. The City will promptly investigate a breach in the security of data. Upon completion of the investigation and final disposition of any disciplinary action related to the breach, the City will prepare a report on the facts and results of the investigation.

11.3B If the breach involves unauthorized access to or acquisition of data by an employee, contractor, or agent of the City, the report will include: 1) a description of the type of data that were accessed or acquired; 2) the number of individuals whose data was improperly accessed or acquired; 3) if there has been final disposition of disciplinary action, the name of each employee determined to be responsible for the unauthorized access or acquisition; and 4) the final disposition of any disciplinary action taken against each employee in response.

11.3C The City will notify the subject of the data that the report is being prepared and how to access the report and that the report may be requested by mail or email. Notification to the data subject may be delayed if a law enforcement agency determines that the notification will impede an active criminal investigation. After the law enforcement agency determines that notification will not compromise the investigation, the notification must be made to the data subject.

11.3D The City will notify each data subject affected by a breach in writing either by first class mail or by electronic notice, or by substitute notice, as allowed by law.

11.4 Penalties for Unlawfully Accessing Not Public Data. The City will utilize penalties for unlawful access by its employees to not public data as provided for in Minnesota Statutes Section 13.09, if necessary. Penalties include suspension, dismissal, or referring the matter to the appropriate prosecutorial authority who may pursue a criminal misdemeanor charge.

EXHIBIT 1

LIST OF DESIGNEES

The Minnesota Data Practices Act establishes a system for compilation and distribution of data gathered by government agencies. All data collected and maintained by the City of Isanti (“City”) is presumed public and is accessible to the public for both inspection and copying, unless classified as Private, Confidential, Nonpublic or Protected Nonpublic in accordance with Federal law, State Statute or a temporary classification.

The City has appointed the following position to administer this system.

Responsible Authority and Data Practices Designee:

Jaden Strand
City Clerk
City of Isanti
110 1st Avenue NW PO Box 428
Isanti, MN 55040
P: (763) 444-5512
F: (763) 444-5560
Jstrand@cityofisanti.us

Data Practices Compliance Official

Josi Wood
City Administrator
City of Isanti
110 1st Avenue NW PO Box 428
Isanti, MN 55040
P: (763) 444-5512
F: (763) 444-5560
E: jwood@cityofisanti.us

The Responsible Authority, Compliance Official, and Designee shall have access to all records.

Other persons responsible for the maintenance and dissemination of City records are as apparent or assigned.

EXHIBIT 2

Annual Fee Schedule

The City of Isanti charges members of the public for copies of government data. These charges are authorized under Minnesota Statutes, section 13.03, subdivision 3(c).

Pre-Payment Mandatory

Pre-payment is mandatory for all copy requests for which fees are charged. Additionally, if a data request will result in voluminous numbers of documents, the City may ask for a deposit prior to copying data. If the cost of providing the copies is less than the deposit amount, the person making the data request will receive a refund of the unused deposit amount. If the cost of providing the copies exceeds the deposit amount, the person making the data request is responsible for the remaining balance before the copies will be provided. The deposit amount must be paid before the City will begin working on processing a data request.

Standard Charges

Please note: An administrative fee may be charged for services not specifically identified, as deemed appropriate by the City Council (and or designees – City Administrator, City Clerk). An administrative fee may be added to the charges in the Fee Register for those situations where the specified fee does not adequately compensate the City.

- The City will not require payment for copies if the cost of copies is less than \$5.00.
- 100 or fewer black and white paper copies/ 8.5” x 11”
single-sided – 25 cents
double-sided – 50 cents
- 100 or More Paper Copies, or Most Other Types of Copies – Actual Cost

What is Actual Cost?

The charge for most other types of copies, when a charge is not set by statute or rule, is the actual cost of searching for and retrieving the data, and making the copies, or electronically transmitting the data (e.g. sending the data by email).

In determining the actual cost of making copies, the City considers factors including but not limited to:

- Staff time to:
 - retrieve documents (except when the subject of the data is making the request);
 - make, certify and compile copies;
 - sort and label documents only if necessary to identify the data to be copied;
 - remove staples or paper clips;

- Please note: the cost of employee time to search for data, retrieve data, and make copies should generally not exceed those of the lowest-paid employee who can complete the task performed. However, if, because of the subject matter of the request, the City finds it necessary for a higher-paid employee to search for and retrieve the data, the City will calculate the search and retrieval portion of the copy charge at the higher salary/wage;

- Materials (paper, copier ink, staples, magnetic tapes, CD's or DVD's, thumb drives, etc.);
- Special costs associated with making copies from computerized data, such as writing or modifying a computer program to format data;
- Mailing costs; and/or
- Costs to pay an outside vendor (including transportation to and from the vendor) if the request is for copies of data that we cannot reproduce ourselves, such as photographs.

EXHIBIT 3

GOVERNMENT DATA ACCESS AND NONDISCLOSURE AGREEMENT

1. **AUTHORIZATION.** City of Isanti ("City") hereby authorizes _____, ("Authorized Party") access to the following government data: _____

2. **PURPOSE.** Access to this government data is limited to the objective of creating summary data for the following purpose: _____

3. **COST.** (Check all that apply):

____ The Authorized Party has been requested by the City to prepare summary data and will be paid in accordance with City policy. The estimated total is: \$ _____

____ is the person who requested the summary data and agrees to bear the City's costs associated with the preparation of the data which has been estimated to be \$ _____.

Signature of Requestor

Date

4. **SECURITY.** The Authorized Party agrees that it and any employees or agents under its control must protect the privacy interests of individual data subjects in accordance with the terms of this Agreement.

The Authorized Party agrees to remove all unique personal identifiers which could be used to identify any individual from data classified by state or federal law as not public which is obtained from City records and incorporated into reports, summaries, compilations, articles, or any document or series of documents.

Data contained in files, records, microfilm, or other storage media maintained by the City are the City's property and are not to leave the City's custody. The Authorized Party agrees not to make reproductions of any data or remove any data from the site where it is provided, if the data can in any way identify an individual.

No data which is not public and which is irrelevant to the purpose stated above will ever be disclosed or communicated to anyone by any means.

The Authorized Party warrants that the following named individual(s) will be the only person(s) to participate in the collection of the data described above:

Complete name (printed)

Title (printed)

5. **LIABILITY FOR DISCLOSURE.** The Authorized Party is liable for any unlawful use or disclosure of government data collected, used and maintained in the exercise of this agreement and is classified as not public under state or federal law. The Authorized Party understands that it may be subject to civil or criminal penalties under those laws. The Authorized Party agrees to defend, indemnify, and hold the City, its officers and employees harmless from any liability, claims, damages, costs, judgments, or expenses, omission of the Authorized Party's failure to fully perform in any respect all obligations under this agreement.

6. **INSURANCE.** In order to protect itself as well as the City, the Authorized Party agrees at all times during the term of this Agreement to maintain insurance covering the Authorized Party's activities under this Agreement. The insurance will cover \$1,000,000 per claimant for personal injuries and/or damages and \$1,000,000 per occurrence. The policy must cover the indemnification obligation specified above.

7. **ACCESS PERIOD.** The Authorized Party may have access to the information described above from _____ to _____.

8. **ACCESS RESULTS.**

A copy of all reports, summaries, compilations, articles, publications or any document or series of documents that are created from the information provided under this agreement must be provided to the City. The Authorized Party may retain one copy of the summary data created for its own records but may not disclose it without City permission, except in defense of claims brought against it.

AUTHORIZED PARTY: _____

By: _____ Date: _____

Title (if applicable): _____

REQUESTOR OF SUMMARY DATA: _____

By: _____ Date: _____

Title (if applicable): _____

CITY OF ISANTI:

By: _____ Date: _____

Its: _____

EXHIBIT 4

NOTICE TO PERSONS UNDER AGE 18

Some of the information you are asked to provide is classified as private under State law. You have the right to request that some or all of the information not be given to one or both of your parents/legal guardians. Please complete the form below if you wish to have information withheld.

Your request does not automatically mean that the information will be withheld. State law requires the City to determine if honoring the request would be in your best interest. The City is required to consider:

- * Whether you are of sufficient age and maturity to explain the reasons and understand the consequences,
- * Whether denying access may protect you from physical or emotional harm,
- * Whether there is reasonable grounds to support your reasons, and
- * Whether the data concerns medical, dental, or other health service provided under Minnesota Statutes Sections 144.341 to 144.347. If so, the data may be released only if failure to inform the parent would seriously jeopardize your health.

NOTICE GIVEN TO: _____ DATE: _____

BY: _____
(name) (title)

REQUEST TO WITHHOLD INFORMATION

I request that the following information:

Be withheld from: _____

For these reasons:

Date: _____ Print name: _____

Signature: _____

EXHIBIT 5

SAMPLE CONSENT TO RELEASE PRIVATE DATA

I, _____, authorize the City of Isanti ("City") to
(print name)
release the following private data about me:

to the following person(s) or entity(ies):

The person(s) or entity(ies) receiving the private data may use it only for the following purpose or purposes:

This authorization is dated _____ and expires on _____.

I understand that my records are protected under state privacy regulations and cannot be disclosed without my consent unless otherwise provided for by law. I also understand that I may cancel this consent at any time prior to the information being released and that in any event this consent expires automatically one year after signing. By signing this document, I give my full and voluntary consent to the City to release the above-listed data to the persons identified in this release, and I waive any and all claims against the City for the disclosure of private data about me in accordance with this document.

Signature

Signature of parent or guardian
(if data subject is under 18 years of age)

IDENTITY VERIFIED BY:

- ☐ Witness: x _____
- ☐ Identification: Driver's License, State ID, Passport,
other: _____
- ☐ Comparison with signature on file
- ☐ Other: _____

Responsible Authority/Designee: _____

EXHIBIT 6

CONSENT TO RELEASE COPYRIGHTED DATA

I, _____, certify that I have the authority to authorize the City of Isanti to release the following copyrighted data of which I am the copyright holder:

To the following person or people: _____

The person or people receiving the copyrighted data may use it only for the following purpose or purposes: _____

This authorization is dated _____ and expires on _____.

**The expiration cannot exceed one year from the date of the authorization.*

I, the undersigned, agree to give up and waive all claims that I might have against the City, its agents and employees for releasing data pursuant to this request.

Printed Name Title

Complete Address Phone

Notarized Signature Date

STATE OF MINNESOTA)
) ss.
COUNTY OF _____)

On this _____ day of _____, 20____, before me, a Notary Public within and for said County, personally appeared _____, known to me to be the person described in and who executed the foregoing instrument and acknowledged that they executed the same as their free act and deed.

Notary Public

My Commission Expires On: _____

EXHIBIT 7

SAMPLE DATA PRACTICES ADVISORY (Tennessee Warning)

Some or all of the information that you are asked to provide on the attached form is classified by State law as either private or confidential. Private data is information that generally cannot be given to the public but can be given to the subject of the data. Confidential data is information that generally cannot be given to either the public or the subject of the data.

Our purpose and intended use of this information is: _____

You _____are / _____are not legally required to provide this information.

If you refuse to supply the information, the following may happen: _____

Other persons or entities authorized by law to receive this information are:

EXHIBIT 8

City of Isanti Tennessee Warning Form

It is the City of Isanti's responsibility to inform potential employees of their privacy rights. Please carefully read the Tennessee Warning provided below. Sign and date the form and return it with your application. Your signature indicates that you have received information regarding your rights as they pertain to the Minnesota Government Data Practices Act.

The Minnesota Government Data Practices Act (Minn. Stat. §§ 13.01 – 13.90) includes two sections affecting applicants seeking employment with the City of Isanti. First, under “Rights of Subjects of Data” (Minn. Stat. § 13.04), when an applicant is asked to provide information about him/herself, the City must advise you of:

- The purpose and intended use of the data;
- Whether you may refuse or are legally required to supply the requested data;
- Any known consequences arising from your supplying or refusing to supply the data; and
- The identity of other persons or organizations authorized by State or Federal law to receive the data you provide.

Second under “Personnel Data” (Minn. Stat. §13.43) the following data on you as an applicant for employment by a public agency is automatically public:

- Your veteran's status;
- Your job history;
- Your education and training;
- Your relevant test scores;
- Your rank on our eligibility list; and
- Work availability.

As an applicant, your name is considered private until you are certified as eligible for appointment to a position or are considered by the appointing authority to be a finalist for a position in public employment.

If you are hired, the following additional data about you will be considered public information:

- Your name;
- Your employee identification number (which is not your Social Security number);
- Your actual gross salary, contract fees, salary range, and actual gross pension;
- The value and nature of employer paid benefits;
- The basis for and the amount of any added remuneration, including expense reimbursement, in addition to your salary;
- Your job title, bargaining unit (if applicable) and job description;
- The dates of your first and last employment with us;

- The status of any written complaints or charges against you while you work for the City of Isanti, regardless whether or not they have resulted in disciplinary action, the final disposition of any disciplinary action and supporting documentation;
- Your work location and work telephone number;
- Your education and training background;
- Work-related continuing education;
- Honors and awards you have received;
- Payroll timesheets or other comparable data that are only used to account for your work time for payroll purposes: except to the extent that release of time sheet data would reveal employee's reasons for the use of sick or other medical leave or other non-public data;
- Your previous work experience;
- The "complete" terms of any settlement agreement (including buyout agreements) except that the agreement must include the specific reasons if it involves the payment of more than \$10,000 of public money; and
- Your badge number. This data is private if the candidate is applying for or is hired for an undercover law enforcement position.

All data concerning you which is placed in your personnel file and which is not addressed in statute as public data (see above listing) is private data. This private data will be available to you and those members of city staff needing it to process city records. In addition, the following persons or organization are authorized by state and federal law to receive this data if they so request in certain circumstances:

- The Bureau of Census;
- Federal, State and County Auditors;
- The State Department of Public Welfare;
- The Department of Human Rights;
- Applicant Data Practices Advisory Continued
- Federal Officials investigating compliance of Affirmative Action and Equal Employment Opportunities;
- Labor organizations and the Bureau of Mediation Services;
- Data may also be made available through court order.

With the exception of the optional data requested, the data you provide is needed to identify you and you assist in determining your suitability for the position for which you are applying. The optional data is used in summary form by the city's Affirmative Action Program to monitor protected class employment and meet federal, state and local reporting requirements. Furnishing the optional data requested about you is voluntary.

NOTICE REGARDING SOCIAL SECURITY NUMBER: This information will be used for payroll taxes, insurance purposes, and retained in the employee's data record.

NOTICE TO MINORS: Minors from whom private data or confidential data is collected have the right to request that parental access to the private data be denied.

If you have any questions regarding your rights as a subject of data, please contact the City of Isanti Human Resources at 110 1st Ave NW P.O. Box 428, Isanti, MN 55011.

This information is subject to change consistent with subsequent amendments to the Minnesota Government Data Practices Act.

I have read and understand the information given above regarding the Minnesota Data Practices Act.

Applicant Signature

Date

EXHIBIT 9

SAMPLE CONTRACT PROVISION

Data Practices Compliance. This contract is governed by Minnesota Statutes Section 13.05, subdivisions 6 and 11, the provisions of which are incorporated by reference into this contract. The City of Isanti (“City”) agrees to give the CONTRACTOR access to data collected or maintained by the City as necessary to perform CONTRACTOR’S obligations under this contract. CONTRACTOR agrees to maintain all data created, collected, received, stored, used, maintained or disseminated by CONTRACTOR consistent with requirements of the Minnesota Government Data Practices Act, Minnesota Chapter 13 (the “Act”). CONTRACTOR will not release or disclose the contents of data classified as not public to any person except at the written direction of the City. CONTRACTOR agrees to defend and indemnify the City from any claim, liability, damage or loss asserted against the City as a result of CONTRACTOR’S failure to comply with the requirements of this Paragraph; provided that CONTRACTOR shall have no duty to defend or indemnify where CONTRACTOR has acted in conformance with the City’s written directions.

EXHIBIT 10

Building Permit/Plans DATA PRACTICES ADVISORY

You may be required to submit building plans with your building permit application so that the City of Isanti can determine whether or not your building permit application should be approved. If you do not submit plans when they are required, your building permit will not be approved. The Minnesota Government Data Practices Act establishes a presumption that all government data are public and are accessible by the public for both inspection and copying unless there is a federal law, a state statute, or a temporary classification of data that provides that certain data are not public. Minnesota Statutes Section 13.01 defines government data as being all data collected, created, received, maintained, or disseminated by the City.

The Government Data Practices Act allows building plans to be classified as non-public ONLY if they contain the following information:

Security information defined by Minnesota Statutes Section 13.37 as being “government data the disclosure of which would be likely to substantially jeopardize the security of information, possessions, individuals or property against theft, tampering, improper use, attempted escape, illegal disclosure, trespass, or physical injury.”

AND / OR

Trade Secret information defined by Minnesota Statutes Section 13.37 as being “government data, including a formula, pattern, compilation, program, device, method, technique or process (1) that was supplied by the affected individual or organization, (2) that is the subject of efforts by the individual or organization that are reasonable under the circumstances to maintain its secrecy, and (3) that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.”

Building plans submitted to the City are generally public information and will be presumed to be available for copying and release to the public. If you hold a copyright to the plans and do not want them copied for the public, then you will need to indicate as such below. Also, if you believe that your building plans qualify for the classification of nonpublic data you must provide documentation verifying your claim. The responsible authority for the City of Isanti will determine whether or not the plans qualify for nonpublic data classification within 10 business days of the request.

Building plans and related documents submitted to the City are presumed to be public and by submitting them and signing this document you are expressly giving permission to the

City to make copies for the City's use and to make available to the public upon request unless you indicate otherwise as follows:

_____ **The building plans I have submitted contain SECURITY INFORMATION as defined by Minnesota Statutes Section 13.37, subdivision 1 (a) and are to be treated as protected nonpublic data.** I understand I must provide an explanation (below) to support my claim that the information I am providing constitutes security information under law.

_____ **The building plans I have submitted contain TRADE SECRET INFORMATION as defined by Minnesota Statutes Section 13.37, subdivision 1 (b) and are to be treated as protected nonpublic data.** I understand I must provide an explanation (below) to support my claim that the information I am providing constitutes trade secret information under law.

_____ **The building plans I have submitted are COPYRIGHTED under and protected by the Federal Copyright Act and I do not give permission for them to be copied for release to the public.** However, I understand the plans are considered public information under Minnesota law and may be viewed by the public.

Explanation:

Name of Applicant (Please Print)

Date

Signature of Applicant

Property address

Contact Address

Contact phone

E-mail address

APPENDIX A

NONPUBLIC, PRIVATE, AND CONFIDENTIAL DATA MAINTAINED BY THE CITY OF ISANTI

DATA INVENTORY

Pursuant to Minnesota Statute § 13.025, subd. 1, the City provides this Data Inventory identifying and describing all not public data on individuals maintained by the City. To comply with Minnesota Statute § 13.05, subd. 5, the City's Data Inventory also indicates the employees who have access to this data.

In addition to the employees listed, the City's Responsible Authority/Data Practices Compliance Official, Data Practices Designee(s), City Councilmembers, City Attorney, and specified agents of the City will also have access to all not public data only on an as-needed basis, and only when necessary as part of a specific work assignment.

This Inventory includes data divided into the following categories: General, Administration, Community and Real Property, Personnel, and Public Safety. These categories are provided only for convenience in locating types of data. Inclusion in any particular category is not intended to indicate an exclusive location for that data type. (For example, data listed under Personnel may be physically located in more than one City department.)

This Inventory includes citations to the applicable Minnesota Statutes. Please refer to the specific statutes cited for the complete details regarding the data classifications, any applicable exceptions, and other information.

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
General				
Audit Data	Data relating to an audit, examination or investigation performed by the state auditor. Data provided for purpose of review and verification must be protected from unlawful disclosure.	Protected Nonpublic/ Confidential	Minn. Stat. § 6.715, subd. 5	City Administrator Finance Director, City Clerk
Business Data	Data by a business requesting financial assistance or benefits financed by public funds. Data becomes public when public assistance is provided or the business receives assistance from the City, except that business plans, income and expense projections not related to assistance, customer lists, tax returns and design, market and feasibility studies not paid for with public funds remain private or nonpublic.	Private/Non Public	Minn. Stat. § 13.591	City Administrator Finance Director, City Clerk, Community Development Director, Economic Development Director
City Attorney Records	Use, collection, storage and dissemination of data by the city attorney is governed by statutes, rules and professional standards concerning litigation, evidence and professional responsibility. Attorney-client and work product privilege documents are confidential.	Confidential	Minn. Stat. § 13.393	City Administrator, Finance Director, City Clerk, Chief of Police, Asst. City Administrator/Public Services Director, Building Official, Community Development Director
Civil Investigative Data	Data collected as part of an active investigation undertaken to commence or defend pending civil litigation, or which are retained in anticipation of pending civil litigation.	Confidential/Protected Nonpublic/Not Public/ Public	Minn Stat. § 13.39	City Administrator, Finance Director, /City Clerk
Council Meetings with Data Classified as Nonpublic	A part of a meeting must be closed is expressly required by other law or if the certain types of data are discussed: alleged victims or reporters of criminal sexual conduct, domestic abuse, maltreatment of minors/vulnerable adults, active investigative data as defined in Minn. Stat. 13.82, subd. 7, internal affairs data relating to law	Private/Public	Minn Stat. § 13D.05	City Administrator, Police Chief

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
	enforcement misconduct, educational, health, medical, welfare, or mental health data not public under Minn. Stat. §§ 13.32; 13.3805, subd. 1; 13.384; or 13.46, subd. 2, 7.			
Elected Officials Correspondence	Correspondence between individuals and elected officials is private data on individuals, but may be made public by either the sender or recipient.	Private/Public	Minn Stat. § 13.601, subd. 2	City Administrator Finance Director, City Clerk
Financial Disclosure Statements	Statements of elected or appointed officials which, by requirement by the City, are filed with the City are public data on individuals.	Public	Minn Stat. § 13.601, subd. 1	City Administrator, Finance Director, City Clerk
Grants	Data created by state agency providing grants and persons/agencies that apply for or receive grants.	Nonpublic/Private	Minn. Stat. § 13.599	City Administrator, Finance Director, City Clerk, Public Services Director/ Asst. City Administrator, Community Development Director, Chief of Police, Economic Development Director
Identity of Employees Making Complaints	The identity of an individual who reports to any governmental body or law enforcement official a violation or suspected violation by their employer of any federal state law or rule.	Private	Minn. Stat. §§ 181.932, subd. 2; 13.7905, subd. 5(b)	City Administrator, City Clerk, Chief of Police
Internal Competitive Response	Bid/proposal for goods/services prepared by staff of government entity competing with those solicited by the same entity from the private sector or different entity from the private sector are private or nonpublic until completion of the selection or evaluation process at which time the data are public with trade secret exception (Minn. Stat. § 13.37).	Private/Nonpublic	Minn. Stat. §§ 13.591, subd. 5; 13.37	City Administrator, City Clerk, Finance Director, Asst. City Administrator/Public Services Director
Internal Auditing Data	Data, notes, preliminary drafts or reports created, collected and maintained by the internal audit offices of the City of by person performing audits for the City	Confidential/Private/ Protected Nonpublic/ Public	Minn. Stat. § 13.392	City Administrator, Finance Director, City Clerk

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
	and relating to an audit or investigation; data on an individual supplying information for an audit or investigation, under certain circumstances.			
Judicial Data	Judicial branch data disseminated to the city has the same classification in the hands of the city as it had in the hands of judicial branch providing it.	Confidential/Private/Protected Nonpublic/Public	Minn. Stat. § 13.03, subd. 4(e)	City Administrator, City Clerk, Chief of Police
Personal Contact and Online Account Information	Data on individual kept by City for notification purposes or as part of subscription list for the City's electronic periodic publications as requested by individual. Includes phone numbers, email, internet usernames and passwords, IP addresses, and other similar data related to the individual's online account or access procedures. Data may only be used for the specific purpose for which person provided the data. Does not include data submitted for purposes of making public comment.	Private	Minn. Stat. §§ 13.356; 13.04, subd., 2	City Administrator, Finance Director, City Clerk, Public Services Director/Asst. City Administrator, Community Development Director, Economic Development Director
Pleadings	Pleadings in a lawsuit by or against the City	Public	Minn. Stat. § 13.03, subd. 12	Certain employees on an as-needed as part of specific work assignments.
Requests for Proposals	RFP's are not public data until the response are opened. Once opened, the name of the responder is public. All other data in the RFP are private/nonpublic until completion of the evaluation process. After the process is completed, all remaining data are public with the exception of trade secret data. If all responses to RFP are rejected before completing evaluation process, all data, other than that made public at the opening, remain private or nonpublic until a resolicitation for RFP's results in the completion of the evaluation process, or purchase is abandoned. If resolicitation does not occur within one year of the proposal opening data, the remaining data become public.	Private/Nonpublic/Not public/Public	Minn. Stat. §§ 13.591, subd. 3(b); 13.37	City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Sealed Bids	Sealed bids, including the number of bids received, prior to opening.	Private/Nonpublic	Minn. Stat. § 13.37	City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director, Community Development Director, Chief of Police, Economic Development Director
Security Information	Data which if disclosed would be likely to substantially jeopardize the security of information possessions, individuals or property against theft, tampering, improper use, physical injury, etc. Includes crime prevention block maps and lists of volunteers in community crime prevention programs and their home addresses and numbers, but these may be disseminated among other volunteers. If City denies a data request based on security information, the City must, upon request provide a short description explaining the necessity for classification.	Private/Nonpublic	Minn. Stat. § 13.37	City Administrator, Chief of Police, Finance Director, City Clerk, Asst. City Administrator/Public Services Director
Service Cooperative Claims Data	Claims experience and all related information received from carriers and claims administrators participating in a group health or dental plan, including long-term disability plan offered through Minnesota service coops and plan participant survey information. Exception applies, see statute.	Nonpublic	Minn. Stat. § 13.203	City Administrator, Finance Director, City Clerk
Social Security Numbers	Social security numbers of individuals, whether in whole or in part. City cannot mail or deliver an item that displays a social security number on the outside of or otherwise visible on the item.	Private	Minn. Stat. § 13.355	City Administrator, Finance Director, City Clerk
State Auditor Data	Data relating to audit conducted by the State Auditor's office for purpose of review and verification of the data, prior to publication of the final report of the audit. Final report is public.	Confidential/Protected Nonpublic	Minn. Stat. § 6.715, subd. 5	City Administrator, Finance Director, City Clerk

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Trade Secret Information	Formula, pattern, compilation, program, device, method or process 1) supplied by person or organization; 2) that is the subject of efforts that are reasonable to maintain its secrecy; and 3) derives economic value from not being generally known to, or readily ascertainable by proper means by other persons who could obtain economic value from its disclosure or use.	Private/Nonpublic	Minn. Stat. § 13.37	City Administrator, City Clerk, Asst. City Administrator/Public Services Director
Utility Disconnection Notice	Utility data on disconnections provided to cities under Minn. Stat. § 216B.0976	Private	Minn Stat. § 13.681, subd. 6	City Administrator, City Clerk, Asst. City Administrator/Public Services Director, Utility Billing/Accounting Clerk
Administration				
Assessor's Data	Data on sales sheets from private multiple listing services organizations, income information on persons used to determine Minn. Stat. § 273.126 class 4(d) property classification; and specified data regarding income properties.	Private/Nonpublic	Minn. Stat. § 13.51	City Administrator, Finance Director, City Clerk
Business Energy Accountability	Data provided by business on an inventory form for business energy use accountability.	Nonpublic	Minn. Stat. §§ 13.681; 216C.44, subd. 5	City Administrator, Finance Director, City Clerk
Candidates for Election to City Council	Data about an individual candidate for election to the City Council is public. Affidavit of candidacy must state an address of residence and phone number. Candidate may request that the address be private data by certifying the police report has been submitted or an order for protection has been issued regarding candidate's or family's safety.	Public/Private	Op. Atty. Gen. NO 852, Oct. 6, 2006; Advisory Opinion No. 05-036; Minn. Stat. § 13.607, subd. 8, and 204B.06, sub. 1b	City Administrator Finance Director, City Clerk
Computer Access Data	Data about a person's access to the City's computer for the purpose of: 1) gaining access to data or information; 2) transferring data or information; or 3) using government services.	Private/Nonpublic	Minn. Stat. § 13.15	City Administrator, City Clerk

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Deferred Assessment Data	Collected pursuant to Minn. Stat. § 435.193, indicating amount or location of cash or other valuables kept in homes of applicants for deferred assessment.	Private	Minn. Stat. §§ 13.4965, subd. 3; 2763124, subd. 13.	City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director
Federal Contracts Data	All data collected and maintained by the City when required to do so by a federal agency as part of its contract with the City.	Private/Nonpublic	Minn. Stat. § 13.35	City Administrator, Finance Director, City Clerk, Community Development Director
Homestead Applications	Social security number, affidavits or other proofs of entitlement to homestead status that are submitted by property owners or their spouses. The data may be disclosed to the Commissioner of Revenue or, under limited circumstances, the county treasurer.	Private	Minn Stat. §§ 13.4965, subd. 3; 273.124, subd. 13	City Administrator, Finance Director, City Clerk,
Municipal Bonds Register Data	Data regarding ownership of municipal obligations.	Private/Nonpublic	Minn. Stat. §§ 13.202, subd. 12; 475.55, subd. 6	City Administrator, Finance Director, City Clerk
Parking Space Leasing Data	Data on applicants for or lessee of a parking space is private/nonpublic: address, home phone, work hours, place of employment, work phone, location of parking space.	Private/Nonpublic	Minn. Stat. § 13.37	City Administrator, Asst. City Administrator/Public Services Director, Finance Director, City Clerk
Registered Voter Lists	Information contained in the master list of registered voters.	Confidential/Public	Minn. Stat. §§ 13.607, subd. 6; 201.091	City Administrator, City Clerk
Security Service Data	Data by collected, created or maintained by a security service for purposes of providing security services to the City.	Nonpublic/Private/ Public	Minn. Stat. §§ 13.861; 13.371; and 13.82, subd. 2, 3, and 4.	City Administrator, Chief of Police, Asst. City Administrator/Public Services Director, City Clerk

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Social Recreational Data	Data on individuals enrolling in recreational or other social programs: name, address, phone, any other identifying data on individual, data describes the health or medical condition of the individual, family relationship, living arrangements, and opinions as to emotional makeup or behavior of individual.	Private	Minn. Stat. § 13.548	City Administrator, Asst. City Administrator/Public Services Director, City Clerk
Solid Waste Customer Lists	Customer lists provided to the City by solid waste collectors.	Private/Nonpublic	Minn. Stat. §§ 13.7411, subd. 4(c); 115A.93, subd. 5	City Administrator, Asst. City Administrator/Public Services Director, City Clerk, Finance Director
Transportation Service Data	Personal, medical, financial, familial, or locational information, except the name, of applicants or users of transportation service for the disabled or elderly.	Private	Minn. Stat. § 13.72, subd. 10	City Administrator, Finance Director, City Clerk, Community Development Director
Community and Real Property				
Appraisal Data	Appraisals made for the purpose of selling or acquiring land through purchase or condemnation	Confidential/Protected Nonpublic/Public	Minn. Stat. § 13.44, subd. 3	City Administrator, Finance Director, City Clerk, Community Development Director, Economic Development Director, Public Services Director/Asst. City Administrator

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Award Data	Financial data on business entities submitted to the City for the purpose of presenting awards to business entities for achievements in business development or performance.	Private/Nonpublic	Minn. Stat. § 13.48	City Administrator, Finance Director, City Clerk, Community Development Director, Economic Development Director, Public Services Director/Asst. City Administrator
Benefit Data	Data on individuals, business entities, collected or created when they seek information about becoming, is, or was an applicant for or recipient of benefits or services provided under any housing, home ownership, rehabilitation and community action agency food assistance programs administered by the City.	Private/Public	Minn. Stat. § 13.462	City Administrator, City Clerk, Community Development Director, Economic Development Director
Housing Agency Data	Correspondence between the agency and agency's attorney containing data collected as part of an active investigation for the purpose of commencing or defending potential or actual litigation; income information on persons collected and maintained to determine property tax classification eligibility; data pertaining to negotiations with property owners regarding purchase of property.	Confidential/Private/Protected Nonpublic/Nonpublic/Public	Minn. Stat. § 13.585	City Administrator, Finance Director, City Clerk, Chief of Police, Economic Development Director
Property Complaint Data	Identifies individuals who register complaints concerning violations of state laws or local ordinances concerning the use of real property.	Confidential	Minn. Stat. § 13.44, subd. 1	City Administrator, City Clerk, Community Development Director, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Planning Questionnaires	Names and addresses of individuals and business and the legal description of property owned by them, when collected in surveys of individuals conducted by the City for the purposes of planning, development and redevelopment.	Private/Nonpublic	Minn. Stat. § 13.59	City Administrator Finance Director, City Clerk, Community Development Director, Economic Development Director
Redevelopment Data	Names and addresses of individuals and businesses and the legal descriptions of property owned by individuals and businesses, when collected in City surveys for planning, development and redevelopment.	Private/Nonpublic	Minn. Stat. § 13.59	City Administrator Finance Director, City Clerk, Community Development Director, Economic Development Director
Personnel				
Applicant Information	Generally, all data about people who are or were an employee, an applicant for employment, a volunteer, or an independent contractor is private. Exceptions: * Veteran status * Relevant test scores * Rank on eligibility test * Job history * Education/training * Work availability * Name, after certified as eligible for appointment to a vacancy or when a final for a position (selected for an interview) * Names of applications to and members of an advisory board or commission.	Private/Public	Minn. Stat. § 13.43	City Administrator, City Clerk, Asst. City Administrator/Public Services Director, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Applicants to a Public Body	<p>Generally all data about people who are or were an applicant or an appointed member of a public body is private. Exceptions:</p> <ul style="list-style-type: none"> * Name * City of residence (unless residency requirement, then address) * Education and training * Employment History * Volunteer work * Awards and honors * Prior Government Service <p>If actually appointed, add:</p> <ul style="list-style-type: none"> * Residential Address * Email or telephone number where appointee can be reached (City email or phone will suffice) 	Private/Public	Minn. Stat. § 13.601	City Administrator, Finance Director, City Clerk
Employee Assistance Information	Data created, collected or maintained by a government entity to administer employee assistance programs similar to the one authorized by Minn. Stat. § 43A.319.	Private	Minn. Stat. § 13.43, subd. 7	City Administrator, City Clerk
Employee Drug and Alcohol Tests	Results of employee drug and alcohol tests.	Confidential/Private	Minn. Stat. §§ 13.43, subd. 5(c); 181.954, subd. 2 and 3	City Administrator, City Clerk, Chief of Police, Asst. City Administrator/Public Services Director

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Employee Data	<p>Generally all data about current and former employees, volunteers, and independent contractors are private.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> * Name * Actual gross salary * Salary Range * Contract fees * Actual gross pension * Value and nature of employer paid fringe benefits * Basis for and the amount of added remuneration (expense reimbursement and salary) * Job title, description * Education and training background, previous work experience * Date of first and last employment * Existence and status of an complaints or charges against employee, regardless of whether result was disciplinary action * Final disposition of any disciplinary action, with specific reasons for the action and data documenting the basis of the action, excluding data that would identify confidential sources who are public employees of body * Terms of any agreement settling any dispute arising from employment relationship, including buyout agreement * Work location and phone number *Badge number * Honors and awards received * Payroll sheets or other comparable data that are only used to account for employee's work time for payroll purposes, except that extent that timesheet data would reveal the employee's reasons for use of sick or other non-medical leave are nonpublic data. 			<p>City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director, Community Development Director, Economic Development Director, Liquor Store Manager, Chief of Police</p>
Employment Training Data	<p>Data on individuals collected, maintained, used or disseminated because an individual applies for or is/has been enrolled in employment and training publicly-funded programs.</p>	Private	Minn. Stat. § 13.47	<p>City Administrator, City Clerk, Finance Director</p>

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Examination Data	Complete versions of personnel and licensing exams.	Confidential/Private	Minn. Stat. § 13.34	City Administrator, City Clerk, Finance Director, Chief of Police, Asst. City Administrator/Public Services Director
Harassment	Data identifying complainant or other witnesses not accessible in harassment complaint if data would threaten complainant/witness safety. Summary information will be provided to employee against complaints made to prepare them for disciplinary proceeding that has been initiated.	Confidential/Private	Minn. Stat. § 13.43, subd. 8	City Administrator, City Clerk
Human Rights Data	Includes investigative data in an open case file, name/address of charging party or respondent, factual basis of allegations, and statute or ordinance on which charge brought; investigative data in closed case file.	Confidential/Private/ Protected Nonpublic/ Public	Minn. Stat. §§ 13.552; 363A.7; and 363A.35	City Administrator, City Clerk
Labor Relations Information	Management position on economic and non-economic items that have not been presenting collective bargaining or arbitration, including information collected or created to prepare management position.	Private/Nonpublic	Minn. Stat. § 13.37	City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director, Chief of Police
Peer Counseling Debriefing	Data acquired by a peer group member in a public safety peer counseling debriefing is private data on the person being debriefed.	Private	Minn. Stat. § 13.43, subd. 9	City Administrator, City Clerk, Chief of Police
Personnel and Employment Data	Data on individuals collected because the individual is or was an employee or an applicant for employment, performs services on a voluntary basis for, or acts as an independent contractor with a government entity.	Private/Public	Minn. Stat. § 13.43	City Administrator, Finance Director, City Clerk, Asst. City Administrator/Public Services Director, Chief of Police
Protection of Employee or Others	To protect employee from self or others from employee, data relevant to the safety concerns may be released to (1) person who may be harmed or attorney when relevant to obtaining restraining order; (2) prepetition screening team in commitment process; (3) a court, law enforcement, or prosecuting authority.	Private/Public	Minn. Stat. § 13.43, subd. 11	City Administrator, City Clerk, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Salary Benefit Survey Data	Data purchased from consulting firms, nonprofit corporations or associations or obtained from employers with written understanding that it shall not be made public.	Nonpublic	Minn. Stat. § 13.435	City Administrator, City Clerk, Finance Director
Undercover Law Enforcement Officer	All personnel data about undercover officer while assigned as such. Then, same data classifications as other employees apply unless threat to safety or investigation.	Private/Public	Minn. Stat. § 13.43, subd. 5	City Administrator, City Clerk, Chief of Police
Public Safety				
Arson Investigation	Information relating to a fire loss or potential fire loss.	Confidential/Public	Minn. Stat. §§ 13.6905, subd. 26; 299F.055; and 299F.06	City Administrator, City Clerk, Chief of Police
Child Abuse Report Records	Active/inactive investigative data of child abuse/neglect victims/reporters under Minn. Stat. § 626.556.	Confidential/Private	Minn. Stat. §§ 13.871, subd. 6(b); 13.82, subd. 8, 9; and 626.556	City Administrator, City Clerk, Chief of Police
Corrections and Detention Data	Data on individuals created, collected, used by a City correction/detention facility, release which discloses medical, psychological financial or personal information not related to individual's detainment; detention data, the release of which endanger an individual's life, investigation, identify a confidential information or endanger security of any institution or its population.	Confidential/Private/ Public	Minn. Stat. § 13.85	City Administrator, City Clerk, Chief of Police
Crime Victim Notice of Release	Identifying data regarding a crime victim, including victim's request for notice of release and notice of release made pursuant to Minn. Stat. § 611A.06.	Private	Minn. Stat. §§ 13.871, subd. 5(a); 611A.06	City Administrator, City Clerk, Chief of Police
Criminal Gang Investigative Data System	Data in the criminal gang investigative data system confidential, but accessible to law enforcement agencies and may be release to criminal agencies.	Confidential	Minn. Stat. §§ 13.6905, subd. 14; 299C.091	City Administrator, City Clerk, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Criminal History Data	Data maintained by agencies, political subdivisions, statewide systems are classified as private, except that data kept by the BCA identifying an person convicted, the offense, disposition, and other information outlined by statute are public for 15 years after discharge of the sentence. Data in integrated search service is private. Person subject of the data may only have (1) list of government entities that provided public or private data about them; and (2) data describing what is maintained about them at each entity.	Private/Public	Minn. Stat. § 13.87	City Administrator, City Clerk, Chief of Police
Criminal History Data – Discharge/Dismissal of Crime	Data in criminal discharge and dismissal records is classified under Minn. Stat. § 609.3751, subd. 5.	Not Public	Minn. Stat. § 13.87	City Administrator, City Clerk, Chief of Police
Diversion Program Data	Names and identifying data concerning diversion program participants that are maintained in the criminal justice data communications network.	Private	Minn. Stat. §§ 13.6905, subd. 18; 299C.46, subd. 5	City Administrator, City Clerk, Chief of Police
Detention Data	Data on individuals created, collected, used or maintained because of their lawful confinement or detainment in a correctional or detention facility, including City jail or lockup.	Private/Confidential/Public	Minn. Stat. § 13.85	City Administrator, City Clerk, Chief of Police
Domestic Abuse Data	Data on individuals collected, created, received or maintained by police departments pursuant to the domestic abuse act.	Confidential/Public	Minn. Stat. § 13.80	City Administrator, City Clerk, Chief of Police
E-Charging Data	Data created by local law enforcement and maintained by the BCA in statewide data system. Credentialing data is private protected nonpublic, and auditing, workflow and routing data is confidential protected nonpublic.	Confidential/Private/Nonpublic	Minn. Stat. § 13.871, subd. 11	City Administrator, City Clerk, Chief of Police
Emergency Telephone Service	Names, addresses and phone numbers provided to a 911 or other emergency system.	Private	Minn. Stat. §§ 13.202, subd. 6; 403.07, subd. 3, 4	City Administrator, City Clerk, Chief of Police
Explosives or Blasting Agents	Data on application to law enforcement to use/store explosives/blasting agents. May be shared with other law enforcement whose job requires access to a facility containing them. Recipients prohibited from disclosing data to anyone not directly involved in the work.	Nonpublic	Minn. Stat. § 299F.75, subd. 4	City Administrator, City Clerk, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Firearms Data	Data about the purchase or transfer of firearms and applications for permits to carry firearms.	Private	Minn. Stat. § 13.87, subd. 2	City Administrator, City Clerk, Chief of Police
Hazardous Substance Emergency	Information contained in hazardous materials notification reports made under Minn. Stat. §§ 299F.091 to 299F.099.	Nonpublic	Minn. Stat. §§ 13.6905, subd. 27; 299F.095; and 299F.096, subd. 1	City Administrator, City Clerk, Chief of Police, Asst. City Administrator/Public Services Director
Health Data	Data on individuals relating to the identification, description, prevention and control of disease or as part of an epidemiologic investigation designated by the commissioner of health as necessary to analyze, describe or protect public health.	Private	Minn. Stat. § 13.3805, subd. 1	City Administrator, City Clerk, Chief of Police, Asst. City Administrator/Public Services Director
Integrated Search Service Data	Data on individuals stored on one or more databases maintained by criminal justice agencies and accessible through the integrated search service operated by the BCA.			City Administrator, City Clerk, Chief of Police
Investigative Detention Data	Data that, if revealed, would identify an informant who provided information about suspected illegal activities and is likely to subject the informant to physical reprisals by others.	Confidential	Minn. Stat. § 13.86	City Administrator, City Clerk, Chief of Police

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Law Enforcement Data	<p>Certain arrest data, request for service data, ad response or incident data are public data.</p> <p>Audio recordings of a 911 call to request service is private data on individuals, but written transcript of the audio recording is public, unless it reveals identity of an individual otherwise protected under Minn. Stat. § 13.82, subd. 17.</p> <p>Criminal investigative data created/collected by law enforcement to prepare a case against a person for commission of a crime or other offense for which the agency has primary investigative responsibility is confidential or protected nonpublic while investigation still active.</p> <p>Photos that are part of inactive investigation files that are clearly offensive to common sensibilities are private or nonpublic, provided that their existence shall be disclosed to any person requesting access to the inactive investigative file.</p> <p>Data on court records relating to name changes under Minn. Stat. § 289.10, subd. 2 which are held by a law enforcement agency are confidential data while an investigation is still active and private when inactive.</p> <p>Data in arrest warrant indices are confidential until defendant has been taken into custody, served with warrant, appears in court, except when law enforcement determines that public purpose is served by making information public.</p> <p>Data uniquely describing stolen, lost, confiscated or recovered property are classified as private or nonpublic, depending on content.</p>	Private/Confidential/ Public/Non Public	Minn. Stat §§ 13.82, 259.10, subd. 2	City Administrator, City Clerk, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
	<p>Financial records of a program paying informant rewards protected nonpublic/confidential data.</p> <p>Data on registered criminal offenders are private data.</p> <p>Data on missing children bulletins are public.</p> <p>Data reflecting thoughts/investigative techniques confidential/nonpublic, provided that information, reports, memoranda have been adopted as the final opinion or justification for a decision of a law enforcement agency are public.</p> <p>Booking photographs are public data.</p> <p>Data that could reveal identity of persons who are customers of a licensed pawnbroker or secondhand goods dealer are private data.</p> <p>Data describing property in a regulated transaction with a licensed pawnbroker or secondhand goods dealer are public</p>			
Orders for Protection and No Contact Orders	Data from orders for protection or no contact orders and data entered by law enforcement to assist in enforcement of those orders. Data about the offender can be shared with the victim for order enforcement.	Private	Minn. Stat. §§ 13.871, subd. 13; 299C.46, subd. 6	City Administrator, City Clerk, Chief of Police
Peace Officer Discipline Procedures	Investigative report made by a law enforcement agency in connection with a peace officer disciplinary matter; identifies of confidential informants in such matters; identities of witnesses expected to testify in disciplinary hearings.	Confidential/Private/Public	Minn. Stat. §§ 13.871, subd. 6(p); 626.89, subd. 6; and 13.43	City Administrator, City Clerk, Chief of Police
Peace Officer Records on Juveniles	Peace officers' records of children who are or may be delinquent or who may be engaged in criminal acts.	Private	Minn. Stat. §§ 13.875, subd. 3; 260B.171, subd. 5	City Administrator, City Clerk, Chief of Police

Name of Record, File, Form or Data Type	Description	Data Classification	Citation for Classification	Employee Work Access
Peace Officer Reports on Accidents	Collected by law enforcement as required for a report of an accident under Minn. Stat. § 169.09, subd. 8. Must be disclosed to, upon written request by, persons in accident or representing estate, surviving spouse, etc., or other person injured in person, property, or means of support, or who incurs other loss by virtue of accident.	Confidential	Minn. Stat. § 169.09, subd. 13	City Administrator, City Clerk, Chief of Police
Reports of Gunshot Wounds	Report made by a health professional regarding wound inflicted by perpetrator of crime using firearm or other dangerous weapon.	Confidential	Minn. Stat. §§ 13.871, subd. 6(a); 626.53	City Administrator, City Clerk, Chief of Police
Safe at Home Data	Identity and location data of Safe at Home Program participants not otherwise classified by law are private data. Data on participant who submits a notice that they are certified part of address confidentiality program may not be shared with any other government entity or disseminated to any person unless 1) express consent from participant; 2) court order; 3) data subject to sharing pursuant to Minn. Stat. 5B.07, subd. 2.	Private	Minn. Stat. §§ 13.805; 5B.07, subd. 1	City Administrator, City Clerk, Chief of Police
Sexual Assault Crime Victims	Data identifying victim who is a minor, in records or reports relating to petitions, complaints or indictments made for criminal sexual conduct in the first – fourth degrees.	Private	Minn. Stat. §§ 13.871, subd. 3(e); 609.3471	City Administrator, City Clerk, Chief of Police
Undercover Buy Fund	Data in investigative files identifying witnesses, sources, or undercover investigators; information in a report at the close of an investigation regarding identity/location of witness.	Confidential/Private/Public	Minn. Stat. §§ 13.6905, subd. 13; 299C.065, subd. 4	City Administrator, City Clerk, Chief of Police
Videotapes of Child Abuse Victims	Videos where child is alleging, explaining, denying, or describing physical or sexual abuse.	Private/Confidential	Minn. Stat. §§ 13.821; 611A.90	Chief of Police
Vulnerable Adult Report Records	Reports made (Minn. Stat. § 626.557) of possible maltreatment of vulnerable adults; identities of persons making such reports.	Private/Confidential	Minn. Stat. §§ 13.871, subd. 6(1); 626.557, subd. 12(b)	City Administrator, City Clerk, Chief of Police