

DATA ACCESS POLICY

Policy Statement

This policy is in effect for all persons or entities which request access to or copies of public data maintained by the HLWD and is intended to comply with the requirements of Minn.Stat. § 13.03, Subd. 2; § 13.05 and Minnesota Rules 1205.300, 1205.400, 1205.500, 1205.600 and 1205.700.

Background

The HLWD will respond to all requests for access to data maintained in its files and computerized databases subject to the restrictions of the Minnesota Government Data Practices Act, copyright laws, decisions of the Office of the Attorney General, and availability of staff time. When appropriate, fees will be charged to recover the costs incurred in providing such information.

Implementation

Data maintained by the HLWD is open to the public unless classified by statutes, temporary classifications pursuant to Minn. Stat. 13.06, or federal law as non-public or protected non-public, or with respect to data on individuals, as private or confidential. The HLWD will keep its records containing government data in such an arrangement and condition as to make them reasonably accessible for inspections. Persons wishing to inspect files are required to schedule an appointment at least two business days in advance with the HLWD Office Manager. This two business days lead time may need to be extended for cases in which a file needs to be reviewed for confidential information, or in the event the HLWD Office Manager is unavailable. Appointments are to be scheduled during HLWD's business hours on Monday through Thursday between 8:00 a.m. and 4:00 p.m. File reviews will be scheduled as soon as possible. The staff will provide general assistance; however, the person requesting the information remains responsible for searching through the file to find the desired information.

Designated Authority

The HLWD Office Manager is designated as the Responsible Authority (RA) of management of data practices for the HLWD.

Fees

No charge will be assessed if files are inspected and no copies requested.

If 100 or fewer pages of black and white, letter, or legal size paper copies are requested, the RA will charge 25 cents for black and white, single sided copies and \$1.00 for color, single sided copies. Copies that are sent electronically are free.

In all other circumstances, including where a person requests copies or electronic transmittal of the data to the person, the RA may require the requesting person to pay the actual costs of searching for and retrieving government data, including the cost of employee time, and for making, certifying, compiling, and electronically transmitting the copies of the data, but may not charge for separating public from not public data. If the RA or designee is not able to provide copies at the time a request is made, copies shall be supplied as soon as reasonably possible.

A person may indicate what they would like to have copied by tabbing the pages desired with the supplies provided by the HLWD. Individual pages identified by the requester will

be copied and charged, in addition to the searching, retrieving, compiling, and postal charges. A double-sided sheet is considered two pages. A person may pick up their copies at the HLWD office once they are completed or make arrangements with the HLWD to have the copies mailed.

The HLWD will make arrangements with a vendor when a data request includes reproduction of agency photographs and slides, large maps, plan sheets, diskettes, videotapes, or other media (since those documents are not allowed to leave the building). The prices will vary depending on the services desired. Quotes may be obtained from the HLWD Office Manager.

The requestor shall pay all charges for copying and services provided by the HLWD in advance of receiving the requested information.

When a request for data involves any person's receipt of copies of HLWD data that has commercial value and is a substantial and discrete portion of or an entire formula, pattern, compilation, program, device, method, technique, process, database, or system developed with a significant expenditure of public funds by the agency, the HLWD may charge a reasonable fee for the information in addition to the costs of making, certifying, and compiling the copies, with the fee charged to relate to the actual development costs of the information. The HLWD will provide sufficient documentation to explain and justify the fee being charged.

Upon request of any person who is denied access to data, the HLWD will certify in writing that the request has been denied and cite the specific statutory section, temporary classification, or specific provision of federal law upon which the denial was based.

Requests for Summary Data

Summary data are statistical records or reports that are prepared by removing all identifiers from private or confidential data on individuals. The preparation of summary data is not a means to gain access to private or confidential data. The HLWD Office Manager will prepare summary data if a request in writing is made and the requestor pre-pays for the cost of creating the data. Upon receiving a written request, the HLWD Office Manager will respond within ten business days with the data or details of when the data will be ready and the amount of the charge.

Submitting Your Data Request

Direct your requests and all inquiries regarding data requests or the availability of data from HLWD to:

Loretta Halbur, HLWD Office Manager
Heron Lake Watershed District
PO Box 345
Heron Lake, MN 56137
507-793-2462
admin@hlwdonline.org

DATA REQUEST FORM – Members of the Public

Date of Request: _____

I am requesting access to data in the following way:

Inspection

Copies

Both inspection and copies

Note: The RA will charge 25 cents for black and white, single sided copies and \$1.00 for color, single sided copies. Double sided copies are considered 2 copies. Copies that are sent electronically are free. Inspection is free but HLWD charges for copies when the cost is over \$10.00.

These are the data I am requesting:

Describe the data you are requesting as specifically as possible. If you need more space, please use the back of this form.

Contact Information

Name: _____

Address: _____

Phone Number: _____ Email address: _____

You do not have to provide any of the above contact information. However, if you want us to mail/email you copies of data, some type of contact information is needed. In addition, if your request is not understood and clarification is needed, without contact information, the request cannot be processed.

POLICY GOVERNING ANNUAL REVIEW OF DATA PRACTICES POLICIES

It is the policy of the HLWD that on or before March 1 of each year that the RA will review the HLWD's data practices policies by completion of the following checklist.

Part 1: Identification of Staff with Data Practices Responsibilities (Policies for Members of the Public and Data Subjects)

Name and contact information for these staff members should be listed in the *Data Practices Contacts* form.

- Each government entity must designate or appoint an individual to be the RA. (Minnesota Statutes, section 13.02, subdivision 16, and Minnesota Rules 1205.1000.) Entities seeking guidance in selecting a RA should look to language in Minnesota Rules 1205.0200, subparts 12 – 15, and Minnesota Statutes, section 13.46, subdivision 10. More information is available on Information Policy Analysis Division (IPAD's) website at www.ipad.state.mn.us/docs/radpco.html. Sample forms to use for appointing an RA are at Minnesota Rules 1205.2000.

Who is your RA? Loretta Halbur, HLWD Office Manager

- Minnesota Statutes, section 13.05, subdivision 13, requires all RAs to appoint or designate a data practices compliance official (DPCO). The RA and DPCO may be the same person. The DPCO must be a government entity employee who assists with data practices related issues.

Who is your DPCO? Loretta Halbur, HLWD Office Manager

- Minnesota Statutes, section 13.03, subdivision 2, allows RAs to appoint one or more designees. The definition of designee is in Minnesota Statutes, section 13.02, subdivision 6.

Has your RA appointed/designated any staff to be data practices designees?

Yes

No

Who are they? _____

Do you want to direct requestors to specific designees depending on what data are requested?

Yes

No

If yes, list name and type of data for which designee is responsible.

If the answer to this question is "No," all requests should be directed to the RA. The RA may appoint the DPCO as the designee for all data requests.

Note: By law, all data requests must be made to the RA or designee; however, you need to make decisions about how your specific entity will handle requests in a way that ensures you respond within the statutory time frames. For example, once a data request is made to the RA, will the RA handle the request, or will the RA give all

requests to the DPCO or another staff person to coordinate responses? Regardless of which staff person actually manages a data request, the RA ultimately is responsible.

Part 2: Setting Parameters for Data Requests
(Policies for Members of the Public and Data Subjects)

- Minnesota Statutes, Chapter 13, does not require that individuals make data requests in writing; however, IPAD recommends that government entities make this their policy. If you decide to require written requests, you should include it in your Data Practices Policy (see [Advisory Opinion 01-014](#)). If you decide not to require written requests, you should still have some system of documenting data requests made verbally.

Do you want to require requestors to make their data requests in writing?

Yes

No

If you require that data requests be made in writing, will you allow requests by mail, fax, and/or email?

Yes

No

Notes (if necessary) _____

If you allow for data requests to be made by email, do you have a central location where email messages are sent that can be accessed by more than one staff person?

Yes

No

Notes (if necessary) admin@hlwdonline.org

- Minnesota Statutes, section 13.05, subdivision 5, requires that all government entities establish appropriate security safeguards for all records containing data on individuals.

When an individual requests data about him/herself, you must verify that the requestor is the data subject or the data subject's parent or guardian. You should know how you verify someone's identity and it is good practice to document how you made the verification.

Notes See HLWD Data Subject Rights Policy for policy on verification of identity.

Part 3: Responding to Data Requests
(Policies for Members of the Public and Data Subjects)

Time frames

- Minnesota Statutes, Chapter 13 sets forth the time frames within which government entities must respond to data requests.

Entities must respond to members of the public seeking public data in an appropriate and prompt manner (section 13.03), and within a reasonable time (Minnesota Rules 1205.0300).

Entities must respond to data subjects seeking access to data about them within ten business days (section 13.04). In other words, entities must either provide the data to the data subject or inform the data subject there are no data available within ten business days. This does not mean that an entity cannot arrange for a longer period of the time to respond, as long as the data subject agrees.

IPAD recommends that entities respond to all data requests in writing.

Notes See HLWD Data Access Policy and Data Subject Rights Policy for policies on response time

Charging for copies of data

- Minnesota Statutes, Chapter 13, allows, but does not require, government entities to charge for copies of data.

Some entities choose an amount below which it is not cost effective to charge for copies. You should check with your entity's financial department to find out if there is such an amount. Do you have a dollar figure below which you will not charge for copies?

Yes

No

If yes, what is the amount? \$10.00

- Government entities may require pre-payment for copies of data if documented in the Data Practices Policy (see [Advisory Opinion 04-068](#)).

Will you require pre-payment for copies?

Yes

No

- If you decide to charge for copies of data, the allowable amount depends upon whether the person requesting the data is the data subject or a member of the public.

Members of the public

Minnesota Statutes, section 13.03, subdivision 3(c)

For 100 or fewer black and white paper copies, the maximum amount government entities can charge is 25¢ per page.

For more than 100 black and white paper copies and most other types of copies (photographs, audiotapes, data on a CD or DVD, data stored electronically, etc.) government entities can charge only the actual cost of employee time to: (1) search for and retrieve the data and (2) make the copies. See also Minnesota Rules 1205.0300. When a requestor asks that the data be sent electronically (e.g., via email), the copy charge may include the actual cost of sending the data.

When calculating employee time for making the copies, you should use the hourly wage of the lowest-paid employee who is able to search for, retrieve, and make the copies. **Note:** Your actual cost could be less than 25¢ per page.

If you charge members of the public for copies, IPAD recommends recalculating, on an annual basis, your actual costs for copying. IPAD also recommends documenting this calculation. More information about charging members of the public for copies is located on IPAD's website at www.ipad.state.mn.us/docs/copycost.html.

Are there statutes, other than Minnesota Statutes, section 13.03 that set specific copy charges for your data?

Yes

No

If yes, cite the statute section(s) and corresponding fee(s) _____

[For example, under Minnesota Statutes, section 144.226, subdivisions 1, 3, and 4, the Minnesota Department of Health charges \$16 for a certified copy of a birth certificate. Under Minnesota Statutes, section 169.09, the Commissioner of Public Safety charges certain persons \$5 for a copy of an accident report.]

Data subjects

Minnesota Statutes, section 13.04, subdivision 3

When a data subject asks for copies, a government entity may charge the actual cost for an employee to make paper copies or to print copies of electronically stored data. See also Minnesota Rules 1205.0300 and 1205.0400. When calculating employee time for making the copies, you should use the hourly wage of the lowest-paid employee who is able to make the copies.

Note: Government entities may not charge for search and retrieval time if a data subject requests copies.

Notes See HLWD Data Access Policy and Data Subject Rights Policy for copy charges.

Part 4: Creating New Data (Policies for Members of the Public and Data Subjects)

- Requests for creation of new data not already collected or maintained by a government entity fall outside the requirements of Chapter 13. So, you are not required to create data to respond to a data request. If you choose to create data, IPAD recommends working with the requestor on a case-by-case basis.

Notes See HLWD Data Subject Rights Policy for the policy governing creation of new data

Part 5: Summary Data (Policy for Members of the Public)

- Minnesota Statutes, section 13.02, subdivision 19, defines summary data and Minnesota Statutes, section 13.05, subdivision 7, discusses the preparation of summary data. Section 13.05 requires an RA to prepare summary data if the request is made in writing and the cost of preparing the summary data is paid for by the requestor. Section 13.05 also allows the RA to delegate the preparation of summary data.
- Minnesota Rules 1205.0700 discusses requirements for responding to summary data requests and preparing summary data. Subpart 3 requires RAs to prepare and implement summary data access procedures. Subpart 4 requires government entities to respond to summary data requests within ten days.
- Minnesota Rules 1205.0700, subpart 5, discusses the requirements of a nondisclosure agreement.

Notes See HLWD Data Access Policy for policy on summary data.

Part 6: Tennesen Warning Notices (Policy for Data Subjects)

- Minnesota Statutes, section 13.04, subdivision 2, discusses the notice that government entities must provide to an individual when collecting private and/or confidential data about that individual from that individual. This notice is commonly referred to as a Tennesen warning.

With limited exceptions, you may not collect, store, use or disseminate private or confidential data for any purpose other than those you specified in the Tennesen warning notice. Because the consequences of not giving a proper notice are so severe, you must tailor your notices to your entity's specific programs. IPAD suggests you seek legal advice when developing your notices. More information about Tennesen warning notices located on IPAD's website at www.ipad.state.mn.us/docs/tw.html.

Notes See HLWD Data Subject Rights Policy for policy on Tennesen Warnings.

Part 7: Informed Consent (Policy for Data Subjects)

- Minnesota Statutes section 13.05, subdivision 4, and Minnesota Rules 1205.1400, discuss informed consents. You must create legally-valid consent forms. More information about informed consent requirements, including sample consent forms, is located on IPAD's website at www.ipad.state.mn.us/docs/consentmain.html.

Will you require data subjects to use only the consent forms your entity has created or will you release data pursuant to a consent form created by another entity? Yes

Explain on a document created by the HLWD

Part 8: Keeping Data Secure
(Policy for Data Subjects)

- Minnesota Statutes, section 13.05, subdivision 5, requires that all government entities establish appropriate security safeguards for all records containing data on individuals.

Private data such as social security numbers, health records, workers compensation, etc. are kept in a locked file cabinet in the HLWD office.

- Minnesota Rules 1205.0400 states that private data are accessible to individuals within a government entity whose work assignments reasonably require access. Minnesota Rules 1205.0600 states that confidential data are accessible to individuals within a government entity whose work assignments reasonably require access. The rule parts require government entities to create written procedures ensuring that only appropriate individuals get access to private and confidential data.

Notes As the RA, the HLWD Office Manager has access to private and confidential data.

Part 9: Creating, Updating, and Posting Policies
(Policies for Members of the Public and Data Subjects)

- Minnesota Statutes, section 13.025 require government entities to create policies that describe the processes members of the public and data subjects need to follow when requesting data.
- Government entities should update their policies yearly. Particularly, entities should update the data practices contact information (to be consistent with staff changes) and make sure the hourly wage rates they use for determining actual copy charge costs are current.

Have you updated your access documents within the last year?

Yes
 No

- Minnesota Statutes, section 13.025, subdivision 4, also requires that government entities make their policies easily available to the public by distributing free copies, or by posting a copy on the government entity's website.

Do you have free copies available for the public, or have them posted at your website?

Yes
 No

Government Entity Decision Checklist

To complete the Data Practices Policies for Members of the Public and Data Subjects, your entity must make the following decisions.

* Indicates obligation under Chapter 13.

	Yes	No
Do we have an RA? *	X	
Do we have a DPCO? *	X	
Do we have any designees?		X
Do we have our policies available for distribution, or have them posted within our entity? *	X	
Do we direct data requestors to staff, other than the RA, for response to data requests?		X
Do we require written requests?	X	
If requests must be in writing, do we allow requests by mail, fax, and/or email?	X	
Do we have a policy to verify a data subject's identity? *	X	
Do we respond to data requests in writing?	X	
Are there statutory provisions, outside of Chapter 13, that give us authority to charge specific amounts for copies of data?		X
If we charge for copies of data, do we have a minimum amount before we charge?	X	
If we charge for copies of data, do we require pre-payment?	X	
Do we have a policy for creating new data?	X	
Do we require that individuals use our consent forms?	X	
Do we have a written policy/practice on how we keep data on individuals secure?*	X	
Do we have a written policy/practice detailing which staff has access to private and/or confidential data?*	X	
When did we last update our access documents? *	Date: November 17, 2021	

POLICY ON COLLECTION, STORAGE, USE, AND RELEASE OF DATA ON INDIVIDUALS

Before *collecting* or *storing* any data on individuals a government entity must ask:

Q: Is the collection or storage necessary for the administration and management of a program specifically authorized by the Legislature or HLWD, or mandated by the federal government? Has the relevant enabling authority been identified?

No – *The data may not be collected or stored.*

Yes – *Proceed to the next question.*

Q: Is the HLWD asking an individual to supply private or confidential data about herself or himself?

No – *The data may be collected without a Tennesen warning notice.*

Yes – *A Tennesen warning notice must be given before the data are collected.* Note: if no Tennesen notice is provided, the data may not be collected, stored, used or disseminated.

Before any government entity may *use* data on individuals, it must ask:

Q: Are the data classified as private or confidential data on individuals?

No – *The data are public and may be used.*

Yes – *Proceed to the next question.*

Q: Is the use necessary for the administration and management of a program specifically authorized by the Legislature or HLWD, or mandated by the federal government?

No – *The data may not be used.*

Yes – *Proceed to the next question.*

Q: Was a Tennesen warning notice provided that informed the data subject of how the data would be used and his/her rights in conformity with Minnesota Statutes, section 13.04, subdivision 2?

Yes – *Data may be used as described in the notice.*

No – *If the data are **confidential**, the data may not be used. If the data are **private**, the data subject's **informed consent** must be obtained before using the data (see Minnesota Statutes section 13.05, subdivision 4 and Minnesota Administrative Rules 1205.1400. See subdivision 4a for informed consent for insurance purposes.)*

Before any government entity may *release* data on individuals, it must ask:

Q: Are the data classified as private or confidential data on individuals?

No – *The data are public and may be released.*

Yes – *Proceed to the next question.*

Q: Is the request for data coming from the data subject?

No – Proceed to the next question.

Yes – If the data are **confidential**, the requester has a right to know the entity maintains confidential data about the individual, but does not get access.

If the data are **private**, the data subject gets access provided he/she provides sufficient documentation proving his/her identity (i.e. photo id).

Q: Is there a state or federal law or court order that allows the requester access to the data?

No – The data may not be released.

Yes – Data may be released according to the legislative authority or court order.

Statutory Citations: See Minnesota Statutes, sections 13.03 (access to government data), 13.04 (rights of data subject), and 13.05 (duties of RA).

DATA SUBJECT RIGHTS

Data About You

The Government Data Practices Act (Minnesota Statutes, Chapter 13) says that data subjects have certain rights related to a government entity collecting, creating, and keeping government data about them. You are the subject of data when you can be identified from the data. Government data is a term that means all recorded information a government entity has, including paper, email, DVDs, photographs, etc.

Classification of Data About You

The Government Data Practices Act presumes that all government data are public unless a state or federal law says that the data are not public. Data about you are classified by state law as public, private, or confidential. See below for some examples.

1. **Public data:** The HLWD must give public data to anyone who asks; it does not matter who is asking for the data or why. An example of public data: The names of HLWD employees.
2. **Private data:** The HLWD cannot give private data to the general public, but you have access when the data are about you. The HLWD can share your private data with you, with someone who has your permission, with the HLWD staff who need the data to do their work, and as permitted by law or court order. An example of private data: Social Security numbers.
3. **Confidential data:** Confidential data have the most protection. Neither the public nor you can get access even when the confidential data are about you. The HLWD can share confidential data about you with the HLWD staff who need the data to do their work and to others as permitted by law or court order. The HLWD cannot give you access to confidential data. An example of confidential data: the identity of the subject of an active criminal investigation.

Your Rights Under the Government Data Practices Act

The HLWD must keep all government data in a way that makes it easy for you to access data about you. Also, the HLWD can collect and keep only those data about you that are

needed for administering and managing programs that are permitted by law. As a data subject, you have the following rights.

- **Access to your data**

You have the right to look at (inspect), free of charge, public and private data that the HLWD keeps about you. You also have the right to get copies of public and private data about you. The Government Data Practices Act allows the HLWD to charge for copies. You have the right to look at data, free of charge, before deciding to request copies.

Also, if you ask, the HLWD Office Manager will tell you whether the HLWD keeps data about you and whether the data are public, private, or confidential.

- **When the HLWD Collects Data from You**

When the HLWD asks you to provide data about yourself that are not public, a notice must be given. The notice is sometimes called a Tennessean warning. The notice controls what the HLWD does with the data collected from you. Usually, the HLWD can use and release the data only in ways described in the notice.

The HLWD will ask for your written permission if we need to use or release private data about you in a different way or if you ask us to release the data to another person. This permission is called informed consent. If you want us to release data to another person, you must use the consent form the HLWD provides.

- **Protecting your Data**

The Government Data Practices Act requires the HLWD to protect your data. The HLWD has established safeguards to ensure that your data are safe.

- **When your Data are Inaccurate/and or Incomplete**

You have the right to challenge the accuracy and/or completeness of public and private data about you. You also have the right to appeal the HLWD's decision.

How to Make a Request for Your Data

To look at data, or request copies of data that the HLWD keeps about you, your minor children, or an individual for whom you have been appointed legal guardian, you must make a written request for the data. Make your request for data to the HLWD Office Manager. A request form is located at the end of this policy.

If you choose not to use the data request form, your request should include:

- That you are making a request, under the Government Data Practices Act (Minnesota Statutes, Chapter 13), as a data subject, for data about you;
- Whether you would like to inspect the data, have copies of the data, or both;
- A clear description of the data you would like to inspect or have copied; and
- Identifying information that proves you are the data subject.

The HLWD requires proof of your identity before a response to your request for data can be made. Please see the Standards for Verifying Identity set forth below.

How the HLWD Responds to a Data Request

Once you make your request, the HLWD Office Manager will work to process your request. If it is not clear what data you are requesting, clarification will be sought.

- If the HLWD does not have the data, the HLWD Office Manager will notify you in writing within 10 business days.
- If the HLWD has the data, but the data are confidential or private data that are not about you, the HLWD Office Manager will notify you with 10 business days and state which specific law states you cannot access the data.
- If the HLWD has the data, and the data are public or private data about you, the HLWD Office Manager will respond to your request within 10 business days, by doing one of the following:
 - Arrange a date, time, and place to inspect the data, for free, if your request is to look at the data, or
 - Provide you with copies of the data within 10 business days. You may choose to pick up your copies or the HLWD Office Manager will mail or fax them to you. The HLWD Office Manager will provide electronic copies (such as email or CD-ROM) upon request if the HLWD keeps the data in electronic format.
 - See information about copying charges. The HLWD Office Manager will also arrange for you to prepay for the copies.

After the HLWD Office Manager has provided you with access to data about you, the HLWD does not have to show you the data again for six months unless there is a dispute or the HLWD collects or creates new data about you.

If you do not understand some of the data (technical terminology, abbreviations, or acronyms), please let the HLWD Office Manager know. The HLWD Office Manager will give you an explanation if you ask.

The Government Data Practices Act does not require the HLWD to create or collect new data in response to a data request if the HLWD does not already have the data, or to provide data in a specific form or arrangement if it is not kept in that form or arrangement. (For example, if the data you request are on paper only, the HLWD is not required to create electronic documents to respond to your request.) If the HLWD agrees to create data in response to your request, the HLWD Office Manager will work with you on the details of your request, including cost and response time.

In addition, the HLWD is not required under the Government Data Practices Act to respond to questions that are not specific requests for data.

Data Practices Contact

Loretta Halbur, HLWD Office Manager
 Heron Lake Watershed District
 PO Box 345
 Heron Lake, MN 56137
 Phone: 507-793-2462
 Fax: 507-793-2253
 Email: admin@hlwdonline.org

Copying Costs – Data Subjects

The HLWD charges data subjects for copies of government data. These charges are authorized under Minnesota Statutes, section 13.04, subdivision 3.

You must pay for the copies before the HLWD Office Manager gives them to you.

If 100 or fewer pages of black and white, letter, or legal size paper copies are requested, the RA will charge 25 cents for black and white, single sided copies and \$1.00 for color, single sided copies. Copies that are sent electronically are free.

The HLWD does not charge for copies if the cost is less than \$10.00.

Actual Cost of Making the Copies

In determining the actual cost of making copies, the HLWD factors in employee time, the cost of the materials onto which the HLWD Office Manager is copying the data (paper, CD, DVD, etc.), and mailing costs (if any). If your request is for copies of data the HLWD cannot reproduce ourselves, such as photographs, you will be charged the actual amount paid to an outside vendor for the copies.

The cost of employee time to make copies is \$26.46 per hour.

DATA INVENTORY

Responsible Authority

This document identifies the name, title, and address of the RA for the HLWD, and describes each category of record, file or process relating to private or confidential data on individuals that are maintained by the HLWD. This document is required by the Minnesota Statutes section 13.05, subdivision 1, and Minnesota Rules Part 1205.1200.

The RA for the HLWD is:
Loretta Halbur, HLWD Office Manager
Heron Lake Watershed District
PO Box 345
Heron Lake, MN 56137
Phone: 507-793-2462
Fax: 507-793-2253
Email: admin@hlwdonline.org

	Name of Record, File, Process, Form, or Data Type	Description	Data Classification	Citation for Classification
1	Employee - Personal Data	Contains net wages, withholdings, and other related personal actions	Public Private	MS 13.43 MS 13.355
2	Social Security numbers	Social Security numbers assigned to individuals	Private	MS 13.355
3	Employee - Time Records	Time cards and daily diaries used for billing	Public Private	MS 13.43
4	Employee - Application Records	Contains data relating to hiring, examination, promotion, discipline, and related personnel actions	Private	MS 13.43
5	Direct deposit applications	Employee applications for direct deposit	Private	MS 13.43
6	Works compensation billings	Records of billings from DOER for employees who receive workers compensation benefits	Private	MS 13.43
7	Unemployment compensation billings	Records of billings from DEED for employee unemployment compensation	Private	MS 13.43
8	Board of Managers	Travel and other reimbursement Contains net wages, withholdings, and other related personal actions	Public Private	MS 13.601 MS 13.43
9	Government services transactions data	Credit card, charge card, debit card, and other electronic transactions	Private	MS 16A.26
10	Data Requests	Data obtained by the Responsible Authority in responding to requests for data maintained by the HLWD	Public Private Confidential	Various
11	Internal audit data	Data created, collected, and maintained by Responsible Authority or persons performing audits for admin and relating to an audit or investigation	Public Private Confidential	MS 13.392 MS 13.43 MS 13.37
12	Vehicle accident reports	Data on individuals involved in motor vehicle accidents	Private Confidential	MS 169.09 Subd. 13 MS 13.03, Subd. 4
13	Security information	Data that would substantially jeopardize the security of information, possessions, individuals, or property against theft, tampering, improper use, attempted escape, illegal disclosure, trespass, or physical injury if data were released to the public	Private	MS 13.37
14	Civil investigative data	Data that are collected in order to start or defend a pending civil legal action, or because a civil legal action is expected	Confidential Public	MS 13.392 MS 13.43 MS 13.37
15	Correspondence	Letters and electronic correspondence	Public Private Confidential	Various
16	Advisory committee member data	Data pertaining to advisory committee applicants and appointees	Public Private	MS 13.601