## lowa sunshine laws

Iowa Public Information Board

## Open Meetings 101

**Iowa Code Chapter 21** 

## **ROAD MAP TO OPEN MEETINGS**

- 1. Are you a governmental body? Only governmental bodies are subject to open meeting laws.
- 2. Are you holding a meeting? We will explore the definition of a meeting and how to know if you are "meeting."
- 3. Are you complying with all legal requirements for a meeting? If you are holding a meeting, you are required to take specific actions to ensure your meeting is compliant with transparency laws. We will review these requirements.
- **4.** Are you holding a closed session? If yes, there are specific requirements that must be met.

## **HISTORY**

"Ambiguity in the construction or application of this chapter should be resolved in favor of openness."

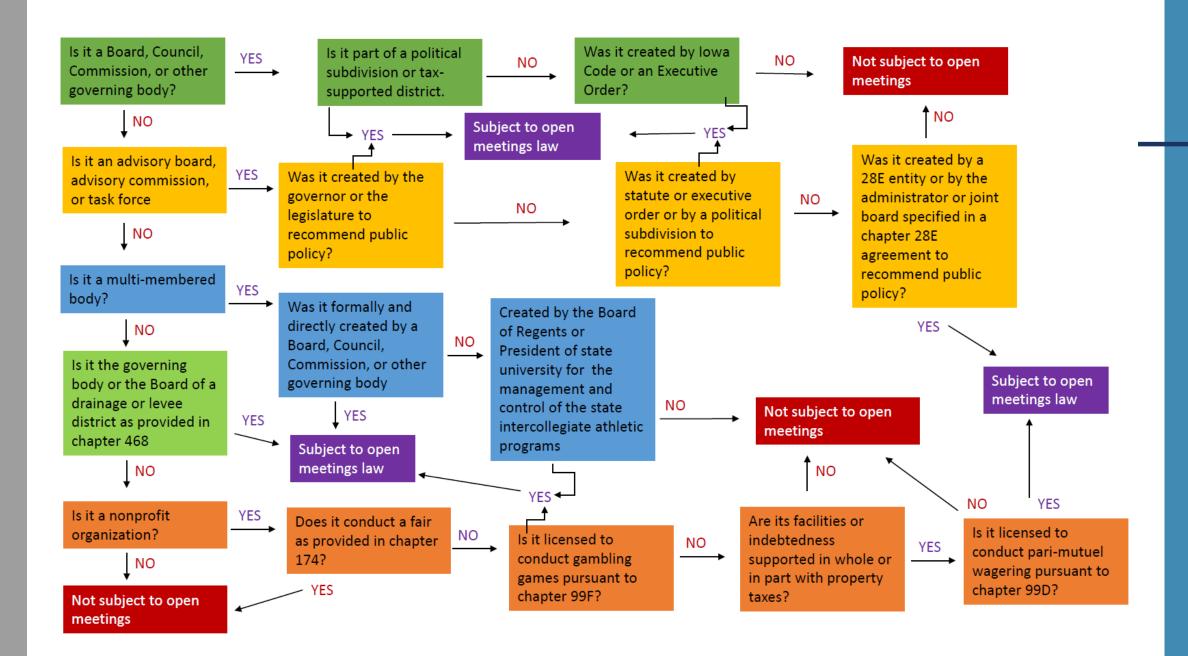
Iowa Code Section 21.1

## ARE YOU A GOVERNMENTAL BODY?

## **GOVERNMENTAL BODIES**

- Boards, Councils and Commissions created by law or appointed by other governing bodies
- Bodies created by the Board of Regents or a president of a university
- Advisory boards, advisory commissions, and task forces created by state or local governments to develop and make public policy recommendations
- Non-profit corporations (other than a fair) who are supported with property tax revenue and licensed to conduct pari-mutual betting
- Non-profit corporations licensed for gambling pursuant to chapter 99F
- Governing bodies of drainage or levee districts
- Advisory boards, advisory commissions, advisory committees, task forces created through 28E agreements or by statute or executive order of state or subdivision to develop and make recommendations on public policy

**lowa Code section 21.2** 



## BEST PRACTICES

- While some ad hoc committees, advisory boards or task forces may not be required to be open, they are encouraged to do so as a matter of good public policy.
- Allowing the public to observe the deliberations will add to the "buy in" necessary to enact any decision or recommendation made by the body.

## ARE YOU HOLDING A MEETING?

## **MEETINGS**

"...a gathering in person or by electronic means, formal or informal, of a majority of the members of a governmental body where there is deliberation or action upon any matter within the scope of the governmental body's policy—making duties." Iowa Code section 21.2(2)

#### Let's break it down. A meeting requires the following:

- 1. A formal or informal gathering of members of a governmental body;
- 2. Participation that constitutes a majority of the members;
- 3. Deliberation or actions occurs; and
- Deliberation or action is within the scope of the governmental body's "policy-making duties."

See also 1981 Iowa Attorney General Opinion 162 (1981).

## BEST PRACTICE

No matter what the gathering is called, if there is deliberation or action upon any matter within the scope of the body's policy-making duties by a majority of the members, it is considered a meeting and must be open.

See also Iowa Public Information Board Advisory Opinion 24AO:0001-Requirements for Work Sessions

## **SOCIAL GATHERINGS**

#### Can members of a governmental body get together socially?

Yes, BUT they cannot discuss business.

- A gathering becomes a "meeting" when a quorum of officials engage in discussion on matters over which they exercise judgment.
  - Deliberation occurs "if the members of the governmental body engage in any discussion that focuses at all concretely on matters over which they exercise judgment or discretion." *Hutchison v. Shull*, 878 N.W.2d 221, 231 fn. 1 (lowa 2016).
- The purpose of the law is to allow citizens to see how their officials arrive at a decision and to hear discussion and opinions.
- Even retreats are public meetings if a quorum is present and policy is discussed.

## ATTENDANCE AT SOCIAL AND MINISTERIAL EVENTS

Chapter 21 excludes events attended by members of a governmental body, such as social, political and civic events, so long as the members avoid deliberation on policy issues within their policy-making duties and their attendance at the event is not to avoid the transparency requirements of the open meetings law.

To avoid deliberation, the members of a governmental body should ensure they take in the information received and ask clarifying questions if needed, but avoid providing any commentary on the topic. They should avoid any comments that begin with phrases similar to the following, which will likely lead to deliberation.

• "I think we should...", "I feel this could...," I support/won't support this...", "My opinion on this matter is...", "I want to take a poll/see what you all are thinking"

## ATTENDANCE AT SOCIAL AND MINISTERIAL EVENTS (CONT.)

A better option is to conduct the conversation in an open meeting following the requirements of chapter 21, so there is no concern with the ministerial gathering becoming an improper meeting.

Persons serving on governmental bodies should be constantly aware that their activities are subject to public scrutiny and should avoid even the appearance of engaging in unauthorized [meetings]. ...

Provide notice the members of the governmental body will be attending the social event. Providing notice when the governmental body will be attending the event demonstrates transparency.

## ATTENDANCE AT SOCIAL AND MINISTERIAL EVENTS (CONT.)

Do not sit together or gather in a majority at the event. Ensuring members are socializing with other attendees at the event prevents any deliberation on matters within the members' scope.

If members are together, make sure the conversation topics are social in nature to avoid bringing up government business."

See Iowa Public Information Board Advisory Opinion 24AO:0004

### **EMAIL AND TEXT**

Can members e-mail or text each other concerning governmental business?

- Every situation is fact specific, and it is easy to send an e-mail to all members just to share relevant information on a topic without the intent to avoid Chapter 21.
- If members want to share an opinion or debate policy, they should save that discussion for the open session.
- Emails and texts are public records.

Best Practice- if some information, such as an agenda, is shared with the members via email, sending as a BCC to the members helps prevent any inadvertent discussion through "reply all."

# ARE YOU COMPLYING WITH ALL LEGAL REQUIREMENTS FOR A MEETING?

## **NOTICE**

#### Meetings must -

- Be preceded by a public notice of at least 24 hours giving the date, time, place and a tentative agenda.
- Notice of the meeting must be sent to any news organization requesting it.
- The notice must be <u>physically posted</u> in a prominent place accessible to the public at the government office. If no office is available, notice should be prominently placed where the meeting will be held.
  - BEST PRACTICE: Posting on the inside of a glass door into the governmental building, posting on a website or community calendar, or at the post office are all ways to promote transparency in government.

## **AGENDAS**

#### What needs to be included in an agenda?

Barebones agenda information such as "approval of old minutes, old business, new business" would **not** be sufficient, nor would using the same agenda for meeting after meeting.

- Tentative agendas can changed under certain circumstances.
- The law allows discussion and action on emergency items,
   An emergency typically includes health and safety or significant financial loss, but if action can reasonably be deferred to allow for notice of the matter, it should be.
- Information on the agenda must be reasonably sufficient to alert interested people as to the subject matter to be considered.
- The agenda must specifically state any issues the board intends to discuss in open or in closed sessions.

## **MINUTES**

Minutes are the public record of a governmental body's activities and decisions. Their usage should be to document the official actions of a governmental body.

Minutes should show, at a minimum:

- the date, time and place of the meeting,
- the members present, and
- the action taken at any meeting
  - All votes must be recorded
  - Votes by each member must be noted individually but a unanimous vote can be so noted as long as all present vote.

Minutes become public record as soon as they are complete and must be published as required by law, in the appropriate newspaper. Although not a substitute to publishing, minutes can also be made available online.

## **ELECTRONIC ACCESS TO MEETINGS - 21.8**

Is a governmental body required to provide electronic access to meetings for members of the governmental body pursuant to the new law?

• Yes. Effective July 1, 2024, Iowa Code § 21.8 requires that a governmental body provide for electronic meeting options for its members.

Is a governmental body required to provide electronic meeting options if none have been requested or it is believed none will be utilized?

 The language is mandatory that the option be provided for official meetings of the governmental body.

Is a governmental body required to provide all electronic meeting options?

No. A governmental body is not required to utilize all options for every meeting.

See Iowa Public Information Board Advisory Opinion 24AO:0004 - Electronic Meetings

### **PUBLIC PARTICIPATION**

While most bodies choose to include a public comment period on their agendas, members of the public have no specific right to participate in the discussion of an item unless they are on the agenda.

Public comments do not have to be placed in the minutes. Minutes only need to include the actions taken and other information required in Chapter 21.

lowa Code 21.7 allows a governmental body to make and enforce reasonable rules for the conduct of its meetings to assure those meetings are orderly, and free from interference or interruption by spectators. **BUT**, **make sure this is uniformly enforced and not based on the content of the message.** See *Peterson v. City of Newton* 

## PUBLIC RIGHTS AT OPEN MEETING

All members of the public have access to an open meeting of the governmental body.

The meeting must be held at a place reasonably accessible to the public and at a time reasonably convenient to the public, unless for good cause such a place or time is impossible or impracticable. Special access to the meeting may be granted to persons with disabilities.

While the public does not have a specific right to participate in the discussion of a meeting, the public does have the right to use cameras or recording devices at the open meeting.

## ARE YOU HOLDING A CLOSED SESSION?

## **CLOSED SESSIONS**

Closed sessions may be held **only** by the vote in open session of **two- thirds** of the members of the body or all members present and only after citing one of the following reasons under lowa Code section 21.5.

- To review or discuss a record which is required or authorized by state or federal law to be kept confidential or as a condition to retain federal funding.
- To discuss application for a patent.
- To discuss strategy with counsel on matters that are currently or may imminently be in litigation.
  - Note- counsel must be identified and must be present in some capacity.

- To discuss contents of a licensing examination, initiate disciplinary investigation or proceeding if the body is involved with licensing or examining.
- To conduct a hearing or discuss whether to conduct a hearing to suspend or expel a student unless the student and/or parent wants the meeting to remain open.
- To discuss the decision to be rendered in a contested case.
- To avoid disclosure of specific law enforcement matters which if disclosed would enable law violators to avoid detection or facilitate disregard of requirements imposed by law.

- To evaluate the professional competency of an individual whose appointment, hiring, performance, or discharge is being considered when necessary to prevent needless and irreparable injury to that individual's reputation and that individual requests a closed session.
  - Teig v. Loeffler, No. 24-0029 (la. Ct. App. Dec. 4, 2024) requires the government body to determine whether a closed
    session is necessary to prevent needless and irreparable injury to
    the reputation of the individual requesting the closed session and
    only being in closed session for that portion. (Accepted for
    further review by the lowa Supreme Court)

- To discuss the purchase or sale of real estate. The minutes and audio recording of the closed session shall be made available when the transaction is dropped or completed. This section may require retention of the closed session records longer than as required in lowa Code section 21.5.
- To discuss records concerning security procedures and emergency preparedness for the protection of government employees, visitors, people under the care and protection of the government and its property.
- To discuss patient care quality and process improvement initiatives in a meeting of a public hospital that if disclosed might harm the hospital's competitive position.

Nothing in Iowa Code 21 *requires* a governmental body to hold a closed session to discuss or act upon any matter.

**IMPORTANT NOTE:** Governmental bodies should be aware that other sections of the Iowa Code beyond Chapter 21 may permit a government agency to close a meeting OR exempt meetings from the requirements of the open meetings law.

## **CLOSED SESSION PROCEDURES**

- No additional topics can be discussed.
  - The purpose and topics for the closed meeting must be the same
  - Recent district court case- Dewitt School Board- "The scope of the meeting was breathtaking in contrast to its stated purpose."
- The session must be recorded and "detailed minutes" taken. These records must be retained for <u>at least</u> one year and are not public record.
- Members may not be excluded from the closed session (unless a conflict exist) and may get access to the closed session recording and minutes if they were absent, but otherwise would have access.
- Final action must happen in open session.

## **EXEMPT SESSIONS**

A meeting of a governmental body to discuss strategy in matters relating to employment conditions of employees of the governmental body who are not covered by a collective bargaining agreement under chapter 20 is exempt from this chapter. For the purpose of this section, "employment conditions" mean areas included in the scope of negotiations listed in section 20.9:

- wages,
- hours,
- vacations,
- insurance,
- holidays,
- Leaves of absence,
- Shift differentials,
- Overtime compensation,
- Supplemental pay,
- · seniority,

- Transfer procedures,
- Job classifications,
- Health and safety matters,
- Evaluation procedures,
- Procedures for staff reduction,
- in-service training,
- grievance procedures for resolving any questions arising under the agreement, and
- Other matters mutually agreed upon

## Public Records 101

**lowa Code Chapter 22** 

## ROAD MAP TO PUBLIC RECORDS

- 1. Has a request been made for a public record? We will explore the definition of a public record.
- 2. Who can obtain public records? This section will discuss what limitations, if any, limit who can obtain public records.
- 3. How does a governmental body comply with legal requirements for producing public records? We will review actions required to be taken by governmental bodies.
- 4. What exemptions exist for the production of public records? There are over 75 exemptions that allow public records to remain confidential outlined in lowa Code. We will review these exemptions.
- 5. What happens if a governmental body does not comply with transparency requirements? We will review possible penalties.

## WHAT IS A PUBLIC RECORD?

### **PUBLIC RECORDS**

All governmental bodies, officials and employees are covered by Chapter 22 - Public Records.

- "Public Record" includes:
  - documents, tape or other information stored or preserved in any medium of or belonging to a governmental body

Iowa Code section 22.1(3)(a).

- including electronic communication such as e-mails, websites, or texts
- all records relating to the investment of public funds

## PUBLIC RECORDS – PUBLIC AND PRIVATE

It is the content of the record, rather than where it is located that determines whether something is a public record.

Emails from a private email address related to public business can be public records and a private communication on a public email could be determined to not be a public record.

BEST PRACTICE: Keep public and private communications separate.

See Kirkwood Institute v. Sand, 6 N.W.3d 1 (Iowa 2024); Iowa Public Information Board Advisory Opinions 24AO:0007 and 24AO:0008.

#### **BEST PRACTICES**

Best practices dictate that a government body should develop a policy governing the use of private devices for government business. This policy could require that the government body or lawful custodian have access to private devices and could establish the specifics of access.

Best practices also should include discussion of the public records request with legal counsel if there is a question regarding disclosure. This will ensure that governmental bodies comply with Iowa law and avoid civil damages, payment of costs, and attorney fees.

### WHO CAN OBTAIN PUBLIC RECORDS?

### WHO HAS THE RIGHT TO EXAMINE PUBLIC RECORDS?

- Anyone can examine, photograph or copy a public record without charge while the public record is in the physical possession of the governmental body.
- The governmental body cannot prevent examination of the records by contracting with a nongovernmental entity to create, hold, or store those records. Iowa Code section 22.2 (6)
- If it's treated like a public document for one person, then it is available to everyone! Remember, public documents can be posted on the internet, shared with anyone, etc.

### MUST A REQUEST BE BY AN IDENTIFIABLE INDIVIDUAL?

Although "person" is not defined in Chapter 22, Iowa Code section 4.1(20) defines "person" to mean "individual, corporation, limited liability company, government or governmental subdivision or agency, business trust, estate, trust, partnership or association, or any other legal entity."

#### A requestor of public records:

- 1. can remain anonymous
- 2. does not need to provide a contact name or physical address
- 3. is not required to show ID
- 4. is not required to fill out a form
- 5. must provide enough information to receive the information sought, such as an email address, if necessary

#### HOW DOES A GOVERNMENTAL BODY COMPLY WITH LEGAL REQUIREMENTS FOR PRODUCING PUBLIC RECORDS?

#### DESIGNATE A LAWFUL CUSTODIAN

Every governmental body must designate a lawful custodian and publicly announce who holds that responsibility. Iowa Code section 22.1(2):

- "Lawful custodian" means the government body currently in physical possession of the public record.
- Each government body shall delegate to particular officials or employees of that government body the responsibility for implementing the requirements of this chapter and shall publicly announce the particular officials or employees to whom responsibility for implementing the requirements of this chapter has been delegated.

### LAWFUL CUSTODIAN AND DATABASES

"Lawful custodian" does not mean an automated data processing unit if the data processing unit holds the records solely as the agent of another public body, nor does it mean a unit which holds the records of other public bodies solely for storage.

Translation: There are agencies that simply store records for other agencies. The responsibility to produce these documents lies with the agency who is the lawful custodian and NOT the agency that is simply providing a storage mechanism.

### RESPOND TO THE REQUEST FOR RECORDS

While Chapter 22 is silent as to the exact time required to respond to a records request, there are requirements to respond.

- Iowa Code section 22.8(4)(d) does not require an absolute twenty-day deadline on a governmental body to find and produce requested public records, no matter how voluminous the request. See *Horsfield Materials, Inc. v. City of Dyersville*, 834 N.W.2d 444 (Iowa 2013).
  - If a request is routine, work to provide it immediately or as soon as possible.
  - A good faith delay is allowed to determine whether the record in question is a public record or confidential. (Section 22.8(4))
    - A reasonable delay for this purpose ordinarily should not exceed
       10 business days and cannot exceed 20 calendar days.

### RESPOND TO THE REQUEST FOR RECORDS

Lawful custodians should communicate with requesters to ensure the correct records are released in as timely a manner as possible and any issues are discussed.

- NOTE: Iowa Supreme Court decisions have raised questions regarding "unreasonable delay" and the factors that justify a delay. See Belin v. Reynolds, 989 N.W.2d 166 (Iowa 2023) and Kirkwood Inst. v. Sand, 6 N.W.3d 1 (Iowa 2024).
- See Iowa Public Information Board Advisory Opinion 24AO:0010 –
   "Reasonable Delay" Inquiry for an outline of factors that may be
   considered in a reasonable delay inquiry.

### SUPERVISION AND FEES FOR PRODUCTION

The custodian may charge a reasonable fee for the services of the custodian to retrieve and copy public records.

- Fees should be based on the actual costs directly attributable to examination or copies of records.
- Fulfillment may be made contingent upon pre-payment of a fee.
- Estimated expenses must be communicated to the requestor.
- Fees cannot exceed the **actual cost** of providing the service and cannot include the costs of ordinary administrative office expenses, such as insurance, depreciation, etc.

### SUPERVISION AND FEES FOR PRODUCTION

- Chapter 22 states the lawful custodian shall make reasonable efforts to provide the record at no cost other than actual copying costs for a record taking less than thirty minutes to produce.
- Governmental bodies can control the terms and conditions of the examination of non-confidential records stored within geographic computer databases. Bodies must establish reasonable rates (actual costs to the government body) for the examination of these records. See Iowa Code section 22.2(3)(a).

### FEES - ATTORNEY REVIEW OF PUBLIC RECORDS

Attorneys representing governmental bodies can charge for time spend reviewing public records, but there are limitations:

- "Costs for legal services should only be utilized for the redaction or review of legally protected confidential information." Iowa Code section 22.3.
- The lawful custodian should only charge the requester for the <u>time an</u> attorney spends actually redacting or reviewing confidential information.

See Iowa Public Information Board Advisory Opinion 23AO:0002 – Costs for Legal Services and 25AO:0001 - Fees charged by county attorneys as lawful custodians of public records.

#### IS REDACTION REQUIRED?

Records cannot be withheld because they contain both nonconfidential and confidential material.

Governmental bodies need to ensure examination of a public record is possible and need to find a way to remove or redact confidential material from records if applicable. See Iowa Code section 22.3A(2).

## WHAT EXEMPTIONS EXIST FOR PRODUCTION OF PUBLIC RECORDS – AKA CONFIDENTIAL RECORDS?

#### **CONFIDENTIAL RECORDS**

#### Iowa Code section 22.7 includes a list of 75+ (and growing) types of records that are confidential under the open records law!

- Additional laws may also contain provisions establishing confidentiality.
- The most commonly utilized exemptions for confidential records are:
  - Medical records
  - Trade secrets protected by law. (Trade secrets are defined in Iowa Code Chapter 550),
  - The work product of an attorney related to litigation by or against a public body.
    - Attorney-client privilege can also apply and should be invoked for public records, if it applies.

#### COMMON EXEMPTIONS, CONT.

- Peace officers' investigative reports, except for date, time, specific location, and immediate facts and circumstances surrounding a crime or incident.
- Crisis intervention reports generated by a law enforcement agency regarding a person experiencing a mental health crisis, substancerelated disorder crisis, or housing crisis.
- Appraisal information concerning the sale or purchase of property for public purposes <u>prior to announcement of the project</u>.
- Information that if released would cause the loss of federal funding.
- Information regarding homeland security.

#### **CONFIDENTIAL PERSONNEL RECORDS - 22.7(11)**

- <u>Personal information</u> in confidential personnel records of governmental bodies <u>relating to identified or identifiable individuals</u> who are officials, officers, or employees of the government bodies is confidential
  - It is the type of record, not where it is located, that matters.
- The following information in personnel records **is public** under 22.7(11):
  - employee's name,
  - compensation (anything of value given to an employee, including pay, benefits, vacation, severance payments and retirement benefits, including any written agreement about terms of employment
  - employment dates and positions held,
  - educational background and previous employment
  - whether the individual resigned in lieu of termination, was discharged, or was demoted as the result of a disciplinary action, and the documented reasons and rationale

### PERSONS OUTSIDE GOVERNMENT - 22.7(18)

- Communication received from a person outside government;
- Communication is not required by law or rule; AND
- The <u>lawful custodian could reasonably determine</u> that the person would be dissuaded from reporting if the communication is made public.
  - The communication is a public record to the extent that the person outside of government making that communication consents to its treatment as a public record.
  - Information contained in the communication is a public record to the extent that it can be disclosed without directly or indirectly indicating the identity of the person outside of government.
  - Information contained in the communication is a public record to the extent that it
    indicates the date, time, specific location, and immediate facts and circumstances
    surrounding the occurrence of a crime or other illegal act, except to the extent that
    its disclosure would plainly and seriously jeopardize a continuing investigation or
    pose a clear and present danger to the safety of any person.

### PERSONS OUTSIDE GOVERNMENT - 22.7(18)

**Job applications from external candidates** (not currently employed by the governmental body) can be confidential pursuant to lowa Code section 22.7(18) if the custodian has reason to believe disclosure would discourage outsiders from future communications.

**Does not** apply to internal government body candidates because they have an "arrangement for compensation" with the government body.

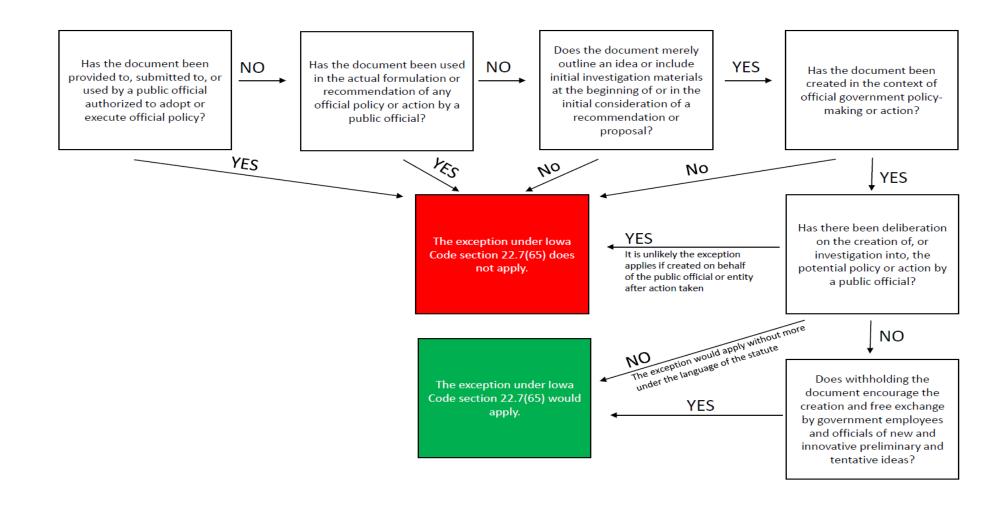
See Teig v. Chavez, 8 N.W.3d 484 (Iowa 2024)

**Does not** apply to applications to fill an elected office. *See* Dierks v. Scott County, No. 23–1729 (Feb. 14, 2025).

#### "DRAFT" RECORDS - 22.7(65)

- Custodians can withhold "tentative, preliminary, draft, speculative, or research material, prior to its completion for the purpose for which it is intended."
- This exception does not apply to public records that are actually submitted for use by government bodies or that are used in the formulation, recommendation, adoption of government policy or action. lowa Code section 22.7(65).

#### 23AO:0008 DRAFT DOCUMENTS



#### **POLICE INVESTIGATIVE FILES - 22.7(5)**

Police investigative files are not guaranteed confidentiality, but rather must qualify for the privilege of confidentiality using a balancing test.

• The confidentiality afforded to police investigative reports under 22.7(5) is a qualified, rather than categorical, privilege. See Mitchell v. City of Cedar Rapids, 926 N.W.2d 222, 232–234 (Iowa 2019). ...demonstrating that a particular record is part of a police investigative report is a necessary, but not sufficient, condition to an ultimate determination that the record is in fact confidential under § 22.7(5).

#### **POLICE INVESTIGATIVE FILES - 22.7(5)**

- In addition to demonstrating that the record in question is part of an investigative report, "[a]n official claiming the privilege must satisfy a three-part test: (1) a public officer is being examined, (2) the communication [to the officer] was made in official confidence, and (3) the public interest would suffer by disclosure." Mitchell v. City of Cedar Rapids, 926 N.W.2d 222, 232 (lowa 2019) (citing Hawk Eye v. Jackson, 521 N.W.2d 750, 752 (lowa 1994)).
- The Iowa Public Information Board has applied the balancing test in numerous complaint and advisory opinions, which can be found on the Iowa Public Information Board website. For example, see Iowa Public Information Board Advisory Opinion 23AO:0003 – Confidentiality of Peace Officer Investigative Files.

#### **SETTLEMENT RECORDS - 22.13**

- When a governmental body is involved in a legal dispute, the body must prepare a summary after the dispute is resolved that indicates the identity of the parties involved, the nature of the dispute and the terms of the settlement.
- The summary and the settlement agreement are public records. Iowa Code section 22.13.

### RELEASE OF CONFIDENTIAL RECORDS

Iowa public records law allows the release of confidential information when:

- Ordered by a court,
- Released by the lawful custodian of the records, or
- Released by another person duly authorized to release such information.

Iowa Code section 22.7

# WHAT HAPPENS IF A GOVERNMENTAL BODY DOES NOT COMPLY WITH TRANSPARENCY REQUIREMENTS?

#### PENALTIES AND SANCTIONS

- The law provides for civil lawsuits. Complaints can also be filed with the IPIB.
- A court can issue an injunction ordering a government body to comply, assess
  damages between \$100-\$2,500, order payment of costs and attorney fees, and
  remove repeat violators from office. If a member of a governmental body
  knowingly participated in a violation, damages increase to \$1,000-\$12,500.
- Ignorance of the law is not a defense, but damages will not be assessed against officials who
  - voted against the violation,
  - refused to participate in the violation,
  - engaged in efforts to resist the violation, or
  - relied upon a formal opinion of the attorney general, the advice of an attorney provided in writing or memorialized in a meeting or the Iowa Public Information Board. Iowa Code section 21.6.

### CONTACT US WITH ANY QUESTIONS



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