

State of Iowa Department of Corrections

Policy and Procedures

Policy Number: AD-GA-23

Applicability: Institutions, CBC, Central Office, IPI

Policy Code: Public Access

Iowa Code Reference: [22](#), [904.602](#), [80F](#)

Chapter 1: ADMINISTRATION AND MANAGEMENT

Sub Chapter: GENERAL ADMINISTRATION

Related DOC Policies: AD-CR-04, AD-GA-09, AD-IS-05, AD-PR-27, AS-PR-29, HSP-304

Administrative Code Reference: [201-2505](#)

Subject: OPEN RECORDS REQUEST

PREA Standards: N/A

Responsibility: Paul Cornelius

Effective Date: September 1, 2026

Authority:

1. PURPOSE

The purpose of this policy is to establish procedures for responding to records requests for public records in compliance with:

- **Iowa Code Chapter 22** *Examination of Public Records*
- **Iowa Code § 904.602** *Confidentiality of Records*
- **Iowa Administrative Code 201-Chapter 2505** *Fair Information Practices*

2. POLICY

It is the policy of the Iowa Department of Corrections (DOC), also referred to as the "Department", to facilitate broad public access to open records in a manner that ensures transparency and government accountability while strictly adhering to the privacy and security protections mandated by Iowa Code.

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3. DEFINITIONS - as used in this policy:

Lawful Custodian - Pursuant to **Iowa Code Chapter 22**, the Lawful Custodian is the Iowa DOC or the Director of the Department. The Lawful Custodian is the entity or person ultimately responsible for the care, custody, and legal protection of public records.

Public Records - All records belonging to the Iowa DOC, which are not authorized or required to be kept confidential under Iowa Code or any other provision of the law.

Record - The whole or a part of any document, tape, or other information stored or preserved in any medium, as defined in **Iowa Code § 22.1**, that is owned by or in the physical possession of the Department.

Records Custodian - A person or office lawfully delegated the authority by the Lawful Custodian to act on behalf of the Department. The Records Custodian is responsible for the day-to-day administration of record requests, including the intake, searching, redaction, and release of records.

4. PROCEDURES

A. Response Timeline and Acknowledgment – Records requests shall be processed promptly and in good faith.

1. Acknowledgment - Receipt of a records request shall be acknowledged within two business days. The State Records portal provides automatic response/notification.
2. Fee Notification - If a records request is expected to incur fees, the Records Custodian shall communicate an estimate of charges to the requester subsequent to the initial acknowledgement. To ensure accurate scope

calculations and prevent unreasonable delay, the estimate must be provided as soon as possible, but no more than five business days from the initial receipt of the records request.

3. Fulfillment Deadlines:

- a. 10 Business Days: Goal for standard fulfillment.
- b. 20 Calendar Days: Maximum allowable delay to determine if a record is confidential or to seek a court injunction, per **Iowa Code § 22.8 (4) "d"**.

4. Records Sought - The records request should reasonably identify the records sought. The Records Custodian may communicate with the requester to clarify overly broad or unclear records requests. The more specific the records request, the easier it will be for the Department to obtain the records, or to render a decision if a record is not subject to release.

5. Volume and Size Delays - For records requests involving a large volume of records or requiring extensive redaction, a delay beyond the standard 20 calendar days may be necessary.

6. The Duty to Communicate - Communication is key when a delay occurs. If the size or nature of the records request precludes a prompt response, the Records Custodian shall notify the requester as soon as that determination is made. This notice shall include:

- a. The reason for the delay;
- b. An estimate of the length of the delay; and
- c. A cost estimate if applicable.

7. Rolling Production - For exceptionally large records requests, the Records Custodian may provide records in installments (rolling production) as they become available, rather than waiting for the entire records request to be processed.

B. Submission and Routing Records Requests

- 1. Records requests may be submitted by any of the following means to the Department's Records Custodian:
 - a. By Email, Phone, In writing;
 - b. Through the [State of Iowa Open Records portal](#) (preferred);

- c. In person, when applicable.
- 2. Immediate Routing - If staff receive a records request, it shall be immediately directed to the appropriate Department designated Records Custodian.
 - 3. Location of Record -
 - a. Records of current incarcerated individuals and clients are maintained at the incarcerated individuals' or clients' place of confinement. For the purpose of processing requests for incarcerated individual/client records, requests should be directed to:
 - 1) Anamosa State Penitentiary: ASP-Records@iowa.gov
 - 2) Clarinda Correctional Facility: CCFRecordsDepartment@iowa.gov
 - 3) Fort Dodge Correctional Facility: FDCFRRecordsOnly@iowa.gov
 - 4) Iowa Correctional Institution for Women: iciwrecords@iowa.gov
 - 5) Iowa Medical and Classification Center: imccrecords@iowa.gov
 - 6) Iowa State Penitentiary: ISPRecords@iowa.gov
 - 7) Mount Pleasant Correctional Facility: DOCMPCFCENTRALRECORDS@iowa.gov
 - 8) Newton Correctional Facility: NCFRecordsStaff@iowa.gov
 - 9) North Central Correctional Facility: nccfrecords@iowa.gov
 - 10) 1st District: doc1st.openrecords@iowa.gov
 - 11) 2nd District: doc2nd.openrecords@iowa.gov
 - 12) 3rd District: doc3rd.openrecords@iowa.gov
 - 13) 4th District: doc4th.openrecords@iowa.gov
 - 14) 5th District: doc5th.openrecords@iowa.gov
 - 15) 6th District: doc6th.openrecords@iowa.gov
 - 16) 7th District: doc7th.openrecords@iowa.gov
 - 17) 8th District: doc8th.openrecords@iowa.gov
 - b. Records of former incarcerated individuals and clients served by the Department are maintained at the Iowa Medical and Classification Center. For the purpose of processing records requests for formerly incarcerated individuals/clients, requests should be directed to the records office at the Iowa Medical and Classification center at imccrecords@iowa.gov.
 - c. All other records requests should be directed to the Central Office Records Custodian at docopenrecords@iowa.gov.
 - 4. No Required Form - There is no required form for the public to use to initiate a records request.

5. Irrelevant Motive - The person making the records request does not have to tell us why they want the record. Motive is irrelevant; staff shall not ask a requester to justify their records request in any way.

C. Cost and Fee Schedule

1. Expenses for fulfilling a records request will be charged to the requester according to the following guidelines:
 - a. The Department provides, at no charge, the first 30 minutes of staff time to search for records, evaluate potentially confidential information, including redaction, and assembly of a records request.
 - b. Any time exceeding 30 minutes is charged based on the hourly rate of the staff member(s) completing the records request.
 - c. Unless the records request can be provided at no charge, an estimate of charges must be provided to the requester before fulfilling a request, utilizing form **AD-CR-04 F-1** *Copy Fee Charge*.
 - d. Prepayment - If the estimated total fee exceeds \$25.00, the Department requires payment in full before staff begin searching for or reviewing records.
 - e. Unpaid Balances - Requesters with an unpaid balance from a previous fulfilled records request must pay both the old balance and the new estimate before the request is processed.
 - f. Previously Fulfilled Records Requests - If a request for specific records has been previously processed, redacted, and provided, those existing records shall be provided at no charge for labor to subsequent requesters. The Department may only charge for the actual cost of the media (e.g., USB drive) or postage if electronic record delivery is not utilized.
 - g. Fee Waiver - Fee waivers may be granted at the Department's discretion. This will occur only in limited circumstances where the release of the information is determined to be in the primary interest of the general public and not primarily in the commercial interest of the requester. The final determination to waive fees rests with the Records Custodian.
 - h. Fee Schedule

The following fees apply to record requests:

- 1) First 30 Minutes: No charge (includes search, assembly, and attorney review).
- 2) Labor (Search/Supervision/Review/Redaction): Actual hourly rate of the staff member completing the task.
- 3) Attorney Review/Redaction: Actual hourly rate of the attorney (after the first 30 minutes).
- 4) eDiscovery Review/Redaction (Emails/Documents): Calculated at a rate of 45 pages per hour.
- 5) Physical Photocopies: \$0.15 per page (only for physical paper copies).
- 6) Postage/Mailing: Actual cost of postage.
- 7) Electronic Media: Actual cost of USB, CD, or other media necessary.

D. Examination and Confidentiality of Public Records

1. Department records shall be made available for examination and copying unless:
 - a. The record is confidential under law;
 - b. Release would jeopardize institutional security;
 - c. Release would violate privacy protections; or
 - d. Another lawful exemption applies.
2. The starting point for all government records is that they are public. Unless a specific legal exemption is identified, you should assume the record is accessible.
 - a. Records that are confidential and may not be released to the general public may be found under **Iowa Code § 22.7**, **Iowa Code §§ 904.602 (2) through (10)**, and **Iowa Code 80F**.
 - b. Department policies provide additional guidance for managing records and protecting confidential data in accordance with state law. Related DOC Policies include: **AD-CR-04 Release of Information**, **AD-GA-09 Contact with the Media and the Public**, **AD-IS-05 ICON Generic Notes**, **AD-PR-27**

*Utilization of Information Technology Resources, **AD-PR-29 Confidentiality of Information, and HSP-304 Review/Release of Medical Information.***

- c. Per **AD-CR-04**, confidential client or incarcerated individual records require a completed form **AD-CR-04 F-2 Consent to Release Information**.
3. Questions regarding the confidentiality of a records request, shall be directed to the Central Office Records Custodian, docopenrecords@iowa.gov.

E. Denial of Records

1. If a records request is withheld in whole or in part, the Department shall provide a formal notification of the denial to the requester. By state law, the Department cannot simply issue a "blanket denial"; we shall establish the legal authority for withholding the information.

Statutory Citation Required - For every record or portion of a record withheld, the Department shall identify the specific legal basis for the denial or redaction. This includes citing the exact Iowa Code section or administrative rule that authorizes the withholding.

2. Civil Penalties - It is critical that denials are handled correctly; agencies that improperly deny access to public records may be subject to civil penalties and legal action.
3. Third-Party Records (Non-Custodial Denials) - The Department shall not disseminate records of which it is not the lawful custodian. If a request involves records created or owned by another source (e.g., Body camera footage from a traffic stop), the Department shall deny the request for those specific items and shall direct the requester to the original source or the proper lawful custodian.

F. Redactions and Segregable Information

1. Pursuant to **Iowa Code Chapter 22** and **Iowa Code § 904.602 (2) "I"**, the Department is required to release all portions of a record that are not specifically exempt by law.
2. Reasonably Segregable - If a record contains both public and confidential information, the Department shall redact the confidential portions and provide the remaining "reasonably segregable" public information.

3. Procedure - Redactions shall be performed in a manner that protects the integrity of the confidential data while ensuring the requester receives all accessible content.
4. Support - If there are questions about the eligibility for release or the appropriateness of a redaction, staff should reach out to the Central Office Records Custodian for guidance.
5. General Counsel - Costs for legal services should only be utilized for the redaction or review of legally protected confidential information.

G. Secure Delivery

1. Electronic-First - Records should be provided electronically (email or through the State Portal) whenever possible. Hard copies are not required unless specifically requested.
2. Confidential Delivery - If sending confidential records to authorized parties, they shall be sent via secure email or via physical copy delivered by mail or in person accompanied by **AD-CR-04 F-3**, *Notification of Confidential Information*.

H. No Creation of Records

1. The Department has no obligation to create new records, conduct research, analyze data, perform legal research, or answer general questions when responding to open records requests.
2. Existing Data - The Department is required to provide existing records, export data if it exists in an existing system, but the law does not require custom calculations or the creation of records that do not otherwise exist. Reasonable spreadsheet manipulation is permissible. A public record cannot be withheld merely because it is in the data processing software.
3. Iowa Public Information Board (IPIB) Guidance - According to the IPIB, "there is nothing in Iowa Code chapter 22 that mandates a governmental body to create a record that does not otherwise exist." ([IPIB Advisory Opinion 15AO:0004](#)).

I. Appeals and Complaints

1. Internal Review - If a requester disagrees with a denial or fee estimate, they should be directed to the DOC Chief of Staff for internal review.

2. External Complaints - Requesters may also go directly to the IPIB at any time to submit a complaint. The IPIB is an independent agency created to resolve disputes and provide guidance on open records law. It's an opportunity for citizens to file a complaint without having to go straight to court.
3. Received IPIB Complaint - If an IPIB Complaint is received, it shall immediately be forwarded to the Central Office Records Custodian and General Counsel, docopenrecords@iowa.gov.

J. Department Designated Records Custodian

1. The Director may designate one or more Records Custodians to administer this policy. The following are designated to fulfill these roles.
 - a. Central Office, docopenrecords@iowa.gov
 - b. Institution and Community-Based Corrections contacts as listed in procedure B. 3.