

**Inventory of Data on Individuals
Maintained by the City of Breckenridge**

This document is part of the City of Breckenridge's procedures for ensuring that not public data are only accessible to individuals whose work assignment reasonably requires access (see Minn. Stat. 13.05, subd. 5). In addition to the employees listed, the City's Responsible Authority, Data Practices Compliance Official, and Data Practices Designee(s) will also have access to all not public data on an as needed basis as part of a specific work assignment.

This document identifies the name, title, and address of the Responsible Authority for the City of Breckenridge and describes private or confidential data on individuals maintained by the City of Breckenridge (see Minn. Stat. 13.05 and Minn. Rules 1205.1200).

City of Breckenridge's Responsible Authority:

Lori Conway, City Administrator

420 Nebraska Ave

Breckenridge, MN 56520

Phone: 218-643-1431

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Email: lconway@breckenridgemn.net

City of Breckenridge's Data Practices Compliance Official:

Lori Conway, City Administrator

420 Nebraska Ave

Breckenridge, MN 56520

City of Breckenridge's Data Practices Designee(s):

Liane Mauch, Legal Admin Secretary

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Breckenridge, MN 56520

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Approved on 06-04-2018, Resolution No. 12857-41/2018

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Data sharing with authorized entities or individuals

State or federal law may authorize the sharing of not 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 have notice of any sharing in applicable Tennessee warnings (see Minnesota Statutes, section 13.04) or the City of Breckenridge will obtain the individual's informed consent. Any sharing of not public data will be strictly limited to the data necessary or required to comply with the applicable law.

Ensuring that not public data are not accessed without a work assignment

Within the City of Breckenridge, divisions may assign tasks by employee or by job classification. If a division maintains not public data that all employees within its division do not have a work assignment allowing access to the data, the division will ensure that the not public data are secure. This policy also applies to divisions that share workspaces with other divisions within the City of Breckenridge where not public data are maintained.

Recommended actions for ensuring appropriate access include:

- Assigning appropriate security roles, limiting access to appropriate shared network drives, and implementing password protections for not public electronic data
- Password protecting employee computers and locking computers before leaving workstations
- Securing not public data within locked work spaces and in locked file cabinets
- Shredding not public documents before disposing of them

Penalties for unlawfully accessing not public data

The City of Breckenridge will utilize the penalties for unlawful access 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.

Data Maintained by the City of Breckenridge

The following data are maintained by the City of Breckenridge

Name of Record, File, Process, Form or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Applicant Records	Completed assessments and results, related documentation, and application forms	Public Private	MSS 13.43	Certain employees on an as needed basis as part of specific work assignments
Attorney Data	Data related to attorney work product or data protected by attorney-client privilege	Private	MS 13.393	Certain employees on an as needed basis as part of specific work assignments
Benefits Enrollment Forms	Employees' medical, dental, deferred compensation, etc. election forms	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Building Permit Applications	Data received from individuals during the process of applying for building permits	Public Non-Public	MS 13.37	Certain employees on an as needed basis as part of specific work assignments
City Council Member data	Data pertaining to City Council members	Public Private Confidential	MS 13.601	Certain employees on an as needed basis as part of specific work assignments
Claims	Claims filed by or against the city	Public Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Complaints by citizens	The identity of individuals who register complaints with government entities concerning violations of state laws or local ordinances concerning the use of real property.	Confidential; the data becomes public when submitted to a court-appointed condemnation commissioner or the data is presented in court for a condemnation proceeding	MS 13.44	Certain employees on an as needed basis as part of specific work assignments
Continuity of Operations	Personal home contact information used to ensure that an employee can be reached in the event of an emergency or other disruption affecting continuity of operation of a government entity.	Private	MS 13.43, subd 17	Certain employees on an as needed basis as part of specific work assignments
Correspondence	Letters and electronic correspondence	Public Private Confidential	Various	Certain employees on an as needed basis as part of specific work assignments
Data on individuals	Data that would identify an individual reporting a violation, suspected violation, or	Private	MS 181.932, subd 2	Certain employees on an as needed basis as part of specific work assignments

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	planned violation of any federal or state law or common law or rule adopted pursuant to law to an employer or to any governmental body or law enforcement official;			
Data on individuals	Data that would identify an employee who is requested by a public body or office to participate in an investigation, hearing, inquiry	Private	MS 181.932, subd 2	Certain employees on an as needed basis as part of specific work assignments
Data on individuals with disabilities	Data that identify an individual with a disability or a family member of an individual with a disability	Private	MS 13.64, subd 2	Certain employees on an as needed basis as part of specific work assignments
Deferment Application	Information collected on individuals for the purpose of processing a deferment application	Private Non-Public	MS 13.51, subd 2 MS 13.52	Certain employees on an as needed basis as part of specific work assignments
Drug and Alcohol Testing Results	Employees' test results	Public Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Electric Utility Customer Data	Data collected individual public utility customers or prospective customers, including copies of tax forms, needed to administer federal or state programs that provide relief from public utility bills, or cold weather disconnection.	Private	MS 13.679	Certain employees on an as needed basis as part of specific work assignments
Employee expense reports	Expense reimbursement requests	Public Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Employment Eligibility Verification/I-9 Form	I-9 Forms submitted by employees	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Examination File	Completed exams administered to applicants & promotional exams administered to employees	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Family Medical Leave Documents	Data on employees regarding FMLA	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Garnishments	Data collected on employees relating to child support and/or spousal maintenance	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Government services transactions data	Credit card, charge card, debit card and other electronic transactions	Private	MS 16A.626	Certain employees on an as needed basis as part of specific work assignments
Grievance Files	Formal written employee grievance and/or complaint filed under a labor agreement or personnel rules, and received by the City.	Public Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments

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Internal audit data	Data created, collected, and maintained for the purpose of performing audits and/or relating to an audit or investigation; working papers gathered or generated until the final report is published or audit becomes inactive.	Public Private Confidential	MS 13.392 MS 13.43 MS 13.37	Finance Director City Administrator Auditor
Labor Relations information	Management positions that have not been presented during the collective bargaining process or interest arbitration, including information collected or created to prepare the management position	Private Confidential	MS 13.37, subd 1(a)	Certain employees on an as needed basis as part of specific work assignments
Medical Data	Medical data of employees disclosed for the purpose of administering claims	Private	MS 13.384 subd, 3	Certain employees on an as needed basis as part of specific work assignments
Personal contact and online account information	Telephone number, email address and usernames and passwords collected, maintained, or received by a government entity for notification purposes or as part of a subscription list for an entity's electronic periodic publications as requested by the individual.	Private	MS 13.356	Certain employees on an as needed basis as part of specific work assignments
Personnel Data	Data about employees, applicants, volunteers and independent contractors; labor relations information	Public Private Confidential	MS 13.43 179A.03, subd 4	Certain employees on an as needed basis as part of specific work assignments
Real property appraisal data (a)	Estimated or appraised values of individual parcels of real property that are made by personnel of the state or a political subdivision or by independent appraisers for the purpose of selling or acquiring land through purchase or condemnation	Confidential Public	MS 13.44, subd 3(a), 3(c)	Certain employees on an as needed basis as part of specific work assignments
Real property appraisal data (b)	Appraised values of individual parcels of real property that are made by appraisers working for fee owners or contract purchasers who have received an offer to purchase their property from the state or a political subdivision	Private Public	MS 13.44, subd 3(b), 3(c)	Certain employees on an as needed basis as part of specific work assignments
Rehabilitation Data	Data collected that pertain to individuals applying for or receiving rehabilitation services	Private	MS 13.791	Certain employees on an as needed basis as part of specific work assignments
Reprimands/Disciplinary Action	Data collected on employees regarding	Public	MS 13.43	Certain employees on an as needed basis

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	reprimands and/or disciplinary action	Private		as part of specific work assignments
Response to Data Requests	Data collected by Data Practices Compliance Official in responding to requests for data	Public Private	Various	Responsible Authority Data Practices Compliance Official/Designee(s)
Responses to requests for proposal	Responses submitted are private until the responses are opened. All other data on individuals are private until completion of the evaluation process. If all responses are rejected prior to completion of the evaluation process, all data, other than that made public at the opening, are private until resolicitation or abandonment of the project.	Private Public	MS 13.599	Certain employees on an as needed basis as part of specific work assignments
Responses to Requests for Proposals (RFPs) and requests for bids	Responses to Requests for Proposals (RFPs) and requests for bids	Public Private	MS 13.591	Certain employees on an as needed basis as part of specific work assignments
Responses to Requests for Proposals (RFPs) and requests for bids	Trade secret data in response to Requests for Proposals (RFPs) and requests for bids	Private	MS 13.37	Certain employees on an as needed basis as part of specific work assignments
Social Security Numbers	Social Security numbers assigned to individuals	Private	MS 13.355	Certain employees on an as needed basis as part of specific work assignments
Travel expense/per diem reports for council, commission, and board members	Travel expense reimbursement requests	Public Private	MS 13.601 MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Unemployment compensation billings	Records of billings from DEED for employee unemployment compensation	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments
Workers compensation billings and information	Records of billings for employees who receive workers compensation benefits	Private	MS 13.43	Certain employees on an as needed basis as part of specific work assignments