

Data Practices and Records Retention Policy

Data Inventory and Records Retention Schedule

Origination Date	June 16, 2026
Revision Effective Date	N/A
Regulatory Requirement(s)	Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act) Minn. R. 2785.0800, subp. 3 (Administration – Recordkeeping)
Cross-References	Membership Agreement and Bylaws (Article XIII, Section 13.1)

I. Data Practices Policy for the Public

Your Right to See Public Data

The Minnesota Government Data Practices Act (Minn. Stat. Ch. 13) presumes that all government data are public unless a state or federal law says the data are not public. Government data means all recorded information a government entity has, including paper, email, flash drives, CDs, DVDs, photographs, etc.

The law also says that The Better Health Collective (“Collective”) must keep all government data in a way that makes it easy for you to access public data. You have the right to look at (inspect), free of charge, all public data that we keep. You also have the right to get copies of public data. The Data Practices Act allows us to charge for copies. You have the right to look at data, free of charge, before deciding to request copies.

How to Request Public Data

You can ask to look at (inspect) data at the Financial Administrator’s offices or ask for copies of public data that the Collective keeps by submitting a written data request to:

Chair of the Board of Trustees
Better Health Collective Responsible Authority
202 – 12th Street NE
Staples, MN 56479

Pursuant to Minn. Stat. § 13.02, subd. 6, the Collective’s Responsible Authority has designated its Financial Administrator to oversee the government data maintained by the Collective. Pursuant to Minn. Stat. § 13.05, subd. 13, the Collective has also appointed the Financial Administrator to serve as the Data Practices Compliance Official.

You may use the Data Request Form – Requesting Public Data found below. If you do not use the data request form, your request should:

- Say that you are making a request for public data under the Government Data Practices Act (Minnesota Statutes, Chapter 13).
- Include whether you would like to inspect the data, have copies of the data, or both.
- Provide a clear description of the data you would like to inspect or have copied.

You are not required to identify yourself or explain the reason for your data request. However, you may need to provide us with some personal information for practical reasons (for example: if you want us to mail copies to you, you need to provide us with an address or P.O Box). If we do not understand your request and have no way to contact you, we cannot respond to your request.

How We Will Respond to Your Data Request

Upon receiving your request, we will review it.

- We may ask you to clarify what data you are requesting.

If we do not have the data, we will notify you in writing as soon as reasonably possible.

- If we have the data, but we are not allowed to give it to you, we will tell you as soon as reasonably possible and identify the law that prevents us from providing the data.
- If we have the data, and the data are public, we will respond to your request appropriately and promptly, within a reasonable amount of time by doing one of the following:
 - Arrange a date, time, and place for you to inspect the data at our offices; or

We will provide notice to you about our requirement to prepay for copies and the amount you owe for copy costs.

- You may choose to pick up your copies, or we will mail or email them to you. We will provide electronic copies (such as email or CD-ROM) upon request, if we keep the data in that format and we can reasonably make a copy.
- Response time may be impacted by the size and/or complexity of your request, and also by the number of requests you make in a given period of time.
- If you do not arrange to inspect the data or pay for the copies within five (5) business days after we tell you the data are ready, we will suspend any further response until you inspect the data or collect and pay for data that have been produced.

If you do not respond to a request for clarification within 10 business days, we will conclude that you no longer want the data and will consider your request closed.

If you do not understand some of the data (technical terminology, abbreviations, or acronyms), please tell the person who provided the data to you. We will give you an explanation if you ask.

The Data Practices Act does not require us to create or collect new data in response to a data request, or to provide data in a specific form or arrangement if we do not keep the data in that form or arrangement. For example, if the data you request are on paper only, we are not required to create electronic documents to respond to your request. If we agree to create data in response to your request, we will work with you on the details of your request, including cost and response time.

We are also not required to respond to questions that are not about your data requests, or that are not requests for government data.

Requests for Summary Data

Summary data are statistical records or reports created by removing identifying information about individuals from entirely private or confidential data.

We will prepare summary data if you make your request in writing and pre-pay for the cost of creating the data.

You may use the data request form below to request summary data. We will respond to your request within ten business days with the data or details of when the data will be ready and how much we will charge you.

Data Practices Contacts

Responsible Authority:

Chair of the Board of Trustees
Better Health Collective Responsible Authority
202 – 12th Street NE
Staples, MN 56479
collectiverfp@sourcewell-mn.gov

As Responsible Authority, the Chair of the Board of Trustees orders the following individuals as data practices compliance official and designees:

Data Practices Compliance Official

Chair of the Board of Trustees
Better Health Collective
202 12th Street NE
Staples, MN 56479
collectiverfp@sourcewell-mn.gov

Copy Costs – When You Request Public Data

Minnesota Statutes, section 13.03, subdivision 3(c) allows us to charge for copies.

*You must pay for the copies before we will give them to you.
If possible, and upon request, we will provide you with an estimation of the total cost of supplying copies.*

- For 100 or fewer paper copies – 25 cents per page
- 100 or fewer pages of black and white, letter or legal-size paper copies cost 25¢ for a one-sided copy, or 50¢ for a two-sided copy.

Most other types of copies – actual cost

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

In determining the actual cost of making copies, we include employee time, the cost of the materials onto which we are copying the data (paper, CD, DVD, etc.), and mailing costs (if any). If your request is for copies of data that we cannot copy ourselves, such as photographs, we will charge you the actual cost we must pay an outside vendor for the copies.

*The cost of employee time to make copies is \$30 per hour.
If, based on your request, we find it necessary for a higher-paid employee to search for and retrieve the data, we will calculate search and retrieval charges at the higher salary/wage.*

Data Request Form – Requesting Public Data

Request date:

The data I am requesting:

Describe the data you are requesting as specifically as possible.

I am requesting access to data in the following way:

- ☐ Inspection
- ☐ Copies
- ☐ Both inspection and copies

Note: Inspection is free, but we charge for copies when the cost is over \$1.

Contact information (optional)*

Name:

Phone number:

Email address:

Address:

We will respond to your request as soon as reasonably possible.

You do not have to provide any contact information. However, if you want us to mail/email you copies of data, we will need some type of contact information. We also need contact information if we do not understand your request. We will not work on your request until we can clarify it with you.

II. Requests for Data About You and Your Rights as a Data Subject

What is a “Data Subject”?

When government has information recorded in any form (paper, hard drive, voicemail, video, email, etc.), that information is called “government data” under the Government Data Practices Act (Minn. Stat. Ch. 13). When we can identify you in government data, you are the “data subject” of that data. The Data Practices Act gives you, as a data subject, certain rights. This policy explains your rights as a data subject, and tells you how to request data about you, your minor child, or someone for whom you are the legal guardian.

When the Better Health Collective Has Data About You

The Better Health Collective (“Collective”) has data on many people, such as employees, vendors, etc. We can collect and keep data about you only when we have a legal purpose to have the data. The Collective must also keep all government data in a way that makes it easy for you to access data about you.

Government data about an individual have one of three “classifications.” These classifications determine who is legally allowed to see the data. Data about you are classified by state law as public, private, or confidential. Here are some examples:

Public Data

The Data Practices Act presumes that all government data are public unless a state or federal law says that the data are not public. We must give public data to anyone who asks. It does not matter who is asking for the data or why the person wants the data. The following are examples of public data about you that we might have:

Contracts with Collective Suppliers, Board Meeting Minutes

Private/Confidential Data

We cannot give private data to the general public. We can share your private data with you, with someone who has your permission, with our government entity staff whose job requires or permits them to see the data, and with others as permitted by law or court order. The following are examples of private data about you that we might have:

Employee’s Name and Address, Social Security Number, Date of Birth.

Confidential data have the most protection. Neither the public nor you can access confidential data even when the confidential data are about you. We can share confidential data about you with our government entity staff who have a work assignment to see the data, and to others as permitted by law or court order. The following is an example of confidential data about you:

Active Investigation Data

Your Rights Under the Government Data Practices Act

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 we keep about you. You also have the right to get copies of public and private data about you. The Data Practices Act allows us to charge for copies. You have the right to look at data, free of charge, before deciding to request copies.

Also, if you ask, we will tell you whether we keep data about you and whether the data are public, private, or confidential.

Access to Data on Minor Children

As a parent, you have the right to look at and get copies of public and private data about your minor children (under the age of 18). As a legally appointed guardian, you have the right to look at and get copies of public and private data about an individual for whom you are appointed guardian.

Minors have the right to ask us not to give data about them to their parent or guardian. If you are a minor, we will tell you that you have this right. We will ask you to put your request in writing and to include the reasons that we should deny your parents access to the data. We will make the final decision about your request based on your best interests.

When We Collect Data from You

When we ask you to provide data about yourself that are not public, we must give you a notice called a Tennessee warning. The notice controls what we do with the data that we collect from you. Usually, we can use and release the data only in the ways described in the notice.

We 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 we provide.

Protecting Your Data

The Data Practices Act requires us to protect your data. We have established appropriate safeguards to ensure that your data are safe. In the unfortunate event that we determine a security breach has occurred and an unauthorized person has gained access to your data, we will notify you as required by law.

When Your Data are Inaccurate 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 our decision. If you are a minor, your parent or guardian has the right to challenge data about you.

How to Make a Request for Your Data

You can ask to look at (inspect) data at our offices or ask for copies of data that we have about you, your minor child, or an individual for whom you have been appointed legal guardian.

You may make your request in writing by mail, fax, or email to the attention of the Chair of the Board of Trustees, using the Data Request Form.

We recommend using the sample **Data Request Form – Data Subjects** below. If you do not choose to use the data request form, your request should:

- Say that you are making a request as a data subject, for data about you (or your child, or person for whom you are the legal guardian), under the Minnesota Government Data Practices Act (Minn. Stat. Ch. 13).
- Include whether you would like to inspect the data, have copies of the data, or both.
- Provide a clear description of the data you would like to inspect or have copied.
- Provide proof that you are the data subject or data subject's parent/legal guardian.

We require proof of your identity before we can respond to your request for data. If you are requesting data about your minor child, you must show proof that you are the minor's parent. If you are a legal guardian, you must show legal documentation of your guardianship. Please see the Standards for Verifying Identity below. If you do not provide proof that you are the data subject, we cannot respond to your request.

How We Respond to a Data Request

Upon receiving your request, we will review it.

- We may ask you to clarify what data you are requesting.
- We will ask you to confirm your identity as the data subject.
- If we do not have the data, we will notify you in writing within 10 business days
- If we have the data, but the data are confidential or not public data about someone else, we will notify you within 10 business days and identify the law that prevents us from providing the data.
- If we have the data, and the data are public or private data about you, we will respond to your request by doing one of the following:
 - Arrange a date, time, and place to inspect data in our office, ensuring you have an opportunity to inspect data within 10 business days of your request at no charge; or
 - Tell you how much the copies cost and then provide you with copies of the data within 10 business days and upon payment of charges for the copies. You may choose to pick up your copies or have us mail or email them to you. We will provide electronic copies (such as email or CD-ROM) upon request, if we keep the data in electronic format and we can reasonably make a copy.

We will provide notice to you about our requirement to prepay for copies.

- Following our response, if you do not arrange to inspect the data or pay for copies within 5 business days after we tell you the data are ready, we will suspend any further response until you inspect the data or collect and pay for the data that have been produced.
- After we have provided you with your requested data, we do not have to show you the same data again for 6 months unless there is a dispute about the data or we collect or create new data about you.

If you do not respond to a request for clarification within 10 business days, we will conclude that you no longer want the data and will consider your request closed.

If you do not understand some of the data (technical terminology, abbreviations, or acronyms), please tell the person who provided the data to you. We will give you an explanation if you ask. The Data Practices Act does not require us to create or collect new data in response to a data request, or to provide data in a specific form or arrangement if we do not keep the data in that form or arrangement. For example, if the data you request are on paper only, we are not required to create electronic documents to respond to your request. If we agree to create data in response to your request, we will work with you on the details of your request, including cost and response time.

In addition, we are not required to respond to questions that are not about your data requests, or that are not requests for government data.

Data Practices Contacts

Responsible authority:

Chair of the Board of Trustees

Better Health Collective

202 12th Street NE

Staples, MN 56479
collectiverfp@sourcewell-mn.gov

As Responsible Authority, the Chair of the Board of Trustees orders the following individuals as data practices compliance official and designees.

Data Practices Compliance Official

Chair of the Board of Trustees
Better Health Collective
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collectiverfp@sourcewell-mn.gov

Copy Costs – Data Subjects

Minn. Stat. § 13.04, subd. 3 allows us to charge for copies.

*You must pay for the copies before we will give them to you.
We do not charge for copies if the cost is less than \$1.00.*

Actual Cost of Making the Copies

We will charge the actual cost of making copies for data about you. In determining the actual cost, we include the employee-time to create and send the copies, the cost of the materials onto which we are copying the data (paper, CD, DVD, etc.), and mailing costs such as postage (if any).

If your request is for copies of data that we cannot copy ourselves, such as photographs, we will charge you the actual cost we must pay an outside vendor for the copies.

The cost of employee time to make copies is \$30 per hour.

Data Request Form – Data Subject

Request date:
Contact information:
Data Subject Name:
Parent/Guardian Name (if applicable):
phone number/email address:

To request data as a data subject, you must show proof of identity. Please see the Standards for Verifying Identity below for acceptable forms of identification.

The data I am requesting:
Describe the data you are requesting as specifically as possible.
I am requesting access to data in the following way:
☐ Inspection

- ☐ Copies
- ☐ Both inspection and copies

Note: Inspection is free but we charge for copies when the cost is over \$1.00.

We will respond to your request within 10 business days.

To be completed by staff member responding to data request:

Identity confirmed:

Date:

Staff name:

Standards For Verifying Identity

The following constitute proof of identity:

- An adult individual must provide a valid photo ID, such as
 - a driver's license
 - a state-issued ID
 - a tribal ID
 - a military ID
 - a passport
 - the foreign equivalent of any of the above
- A minor individual must provide a valid photo ID, such as
 - a driver's license
 - a state-issued ID (including a school/student ID)
 - a tribal ID
 - a military ID
 - a passport
 - the foreign equivalent of any of the above
- The parent or guardian of a minor must provide a valid photo ID and either
 - a certified copy of the minor's birth certificate or
 - a certified copy of documents that establish the parent or guardian's relationship to the child, such as
 - a court order relating to divorce, separation, custody, foster care
 - a foster care contract
 - an affidavit of parentage
- The legal guardian for an individual must provide a valid photo ID and a certified copy of appropriate documentation of formal or informal appointment as guardian, such as
 - court order(s)
 - valid power of attorney

Note: Individuals who do not inspect data or pick up copies of data in person may be required to provide either notarized or certified copies of the documents that are required or an affidavit of ID.

III. Records Retention Policy, Inventory, and Retention Schedule

Minnesota Government Data Practices Act and Minnesota Records Management Act

The Minnesota Government Data Practices Act at Minn. Stat. Ch. 13, regulates the collection, creation, storage, maintenance, dissemination, and access to government data in government entities. It establishes a presumption that government data are public and reasonably accessible for inspection and copying unless the data are classified as not public by state or federal law, or temporary classification.

1. Data Inventory

Minn. Stat. § 13.025, requires the Responsible Authority for each government entity to prepare an inventory containing the Responsible Authority's name, title address, and a description of each category of record, file, or process relating to private or confidential data maintained by the entity. The inventory must be posted in a conspicuous place at the entity's office or on its website.

2. Data Index

Under Minn. R. 1205.1500, the Responsible Authority is also required to prepare an index describing all data collected, stored, used, or disseminated by the entity and identifying the law authorizing the functions for which data are collected. The index must be available to the general public, upon request, and it must be updated when new or different data collection or use is authorized.

3. Records Retention Schedule

Minn. Stat. § 138.17, subd. 7, requires the head of each government entity to establish and maintain an active, continuing program for the economical and efficient management of the records in its custody. This includes preparing an inventory of the records in the entity's custody and establishing a period for the retention or disposal of each series of records. Each entity must also maintain a list of records it has disposed. In accordance with Minn. Stat. § 325L.12, the Collective may retain electronic records of any data subject to this retention policy.

Policy

The Data Practices and Records Retention Policy and Collective Data Inventory and Records Retention Schedule serve as the Collective's compliance with these requirements.

The Collective's current Data Inventory and Records Retention Schedule is attached as Appendix A. The retention period listed represents the minimum period records will be retained. The Collective may, in its discretion, maintain a particular record for longer than the listed retention period.

Appendix A: Data Inventory and Records Retention Schedule

Item	Title	Description	Retention Period	Archival	Classification
1	Annual Reports	All reports required by state or federal law, including any annual report to any agency of the State of Minnesota or the United States.	Permanent pursuant to Minn. Stat. § 15.17	Yes	Public

2	Official Records of the Board of Trustees	All records and information regarding the official activities of the Collective Board of Trustees, including bylaws, resolutions, Affidavits of Publication, election records, agenda and related documents, financial and other reports, meeting minutes and resolutions, and Board-approved policies.	Permanent pursuant to Minn. Stat. § 15.17	Yes	Public
3	Official Records of Board Committees	All records and information regarding the official activities of any committees appointed by the Board of Trustees, including agenda and supporting documents, reports, and meeting minutes.	Permanent pursuant to Minn. Stat. § 15.17	Yes	Public
4	Joint Powers Agreements	Contracts between the Collective and one or more other government unit entered under the Minnesota Joint Powers Act at Minn. Stat. § 471.59.	Permanent pursuant to Minn. Stat. § 15.17	No	Public
5	Official Financial Records	All data necessary to preserve a full record of the Collective's official financial activities, including general and year-end journals, ledgers of accounts, check registers, final annual operating budgets, budget publications, annual financial reports, final internal and external audit reports, and year-end reports of revenue and expenditures.	Permanent pursuant to Minn. Stat. § 15.17	Yes	Public
6	Accounting and Finance Operations	Data and information not otherwise identified in this Data Inventory that is necessary to support the Collective's financial operations, including, but not limited to, banking, taxes, accounts payable, expense reimbursement and tracking, purchasing, fixed assets, and related functions.	6 years after expiration pursuant to Minn. Stat. § 16C.05, subd. 6	No	Public except for Personnel Data deemed Private pursuant to Minn. Stat. § 13.43
7	Internal Auditing Data	Data created, collected, and maintained for purposes of performing an audit or related to an audit or investigation, including working papers gathered or generated before a final audit report is published or the audit becomes inactive.	6 years pursuant to Minn. Stat. § 16C.05, subd. 6	No	Confidential or protected nonpublic until publication of final report pursuant to Minn. Stat. § 13.392

8	Civil Investigative Data	Data collected as part of an active investigation undertaken in anticipation of or for the purpose of starting or defending a pending civil legal action, including records related to allegations of sexual or other harassment.	Duration of applicable statute of limitations.	No	Protected Nonpublic or Confidential until deemed Public pursuant to Minn. Stat. § 13.39, subd. 3
9	Arbitration and Mediation	All final decisions resulting from alternative dispute resolution, including mediation and arbitration.	Permanent pursuant to Minn. Stat. § 15.17	No	Public
10	External Correspondence	Routine electronic and paper correspondence, memoranda, and communications with external parties.	2 years	No	Varies with subject of correspondence.
11	Internal Communications	Routine internal communications and messaging related to day-to-day operations, including audio/video messages, instant messages, and email.	18 months	No	Varies with the subject of the communication.
12	Meeting Recordings	Audio and visual recordings of online, in-person, or hybrid meetings.	45 days	No	Varies with subject of meeting.
13	Other Recordings	Audio and visual recordings of other events, presentations, and activities.	Upon fulfillment of business purpose.	No	Varies with subject of recording.
14	Program Materials	Documents and other resources not otherwise identified in this Data Inventory that are necessary to support planning, creating, implementing, marketing, and supporting programs and services provided by the Collective.	Varies by department and subject matter.	No	Public unless data provided is otherwise classified.
15	Contracts/Agreements	All agreements between the Collective and one or more other external parties regardless of topic, including all contracts entered to purchase, sell, lease, or otherwise transfer goods, services, or funding or the lease of real property or equipment except as otherwise listed this Inventory.	6 years after expiration pursuant to Minn. Stat. § 16C.05, subd. 6 and Minn. Stat. § 541.05, subd. 1	No	Public
16	Public Data Requests	Data collected, created, received, maintained, or disseminated by the Collective in response to a public data request.	3 years	No	Public unless data provided are otherwise classified.

17	Security Information	Data, if disclosed to the public, is likely to jeopardize the security of information, possessions, individuals, or property against theft, tampering, improper use, attempted escape, illegal disclosure, trespass, or physical injury.	Varies by department and subject matter.	No	Private pursuant to Minn. Stat. § 13.37
18	Solicitations for Contracts and Related Documentation (Request for Proposals and Invitation for Bids)	All materials related to: solicitation research and drafts (request for proposals/invitation for bids), proposals or bids, evaluation, and negotiations.	6 years	No	Nonpublic until deemed Public pursuant to Minn. Stat. § 13.591, subd. 3.
19	Attorney Data	Data related to attorney work product or data protected by attorney-client privilege.	6 years	No	Varies pursuant to Minn. Stat. § 13.393.
20	Claims Data	All records and information related to claims that are received by the Collective, including insurance census premium reports and claims summaries and related information.	6 years after expiration of related insurance contracts pursuant to Minn. Stat. § 16C.05, subd. 6.	No	Nonpublic pursuant to Minn. Stat. § 13.203