



Hon. Governor Kim Reynolds  
Office of the Governor Iowa, State Capitol, 1007 East Grand Avenue  
Des Moines, Iowa 50319  
Sent via email to [sam.langholz@iowa.gov](mailto:sam.langholz@iowa.gov); [pat.garrett@iowa.gov](mailto:pat.garrett@iowa.gov)

Director Dr. Beth Skinner  
Iowa Department of Corrections  
Central Office, 510 E 12th St  
Des Moines, Iowa 50319  
Sent via email to [doc.information@iowa.gov](mailto:doc.information@iowa.gov); [cord.overton@iowa.gov](mailto:cord.overton@iowa.gov)

April 29, 2020

Dear Governor Reynolds and Director Skinner,

On behalf of the ACLU of Iowa, under Iowa's Open Records Statute, Iowa Code ch. 22., I am requesting an opportunity to inspect or obtain copies of the below records regarding COVID-19 infection risk and spread among people living and working in Iowa Department of Corrections facilities.

I request to inspect or obtain all records in the custody and/or control of the Governor's office and/or the Iowa Department of Corrections:

1. Estimating or predicting COVID-19 infection rates and mortality among people living and working in Iowa Department of Corrections facilities, including records identifying any model(s) and/or algorithm(s) used or relied upon by the Iowa Department of Corrections to predict COVID-19 spread.
2. Regarding the risk of spreading COVID-19 to the communities surrounding Iowa Department of Corrections facilities via movement of staff and incarcerated people in and out of, and between, facilities.
3. Regarding actions the Governor or the Iowa Department of Corrections could take to address the risk of COVID-19 for people living and working in Iowa Department of Corrections facilities and the likely outcomes of those actions.
4. Regarding suspected or confirmed COVID-19 related infections and COVID-related deaths among people living and working in Iowa Department of Corrections facilities.
5. Related to COVID-19 related complaints, grievances and/or requests made by people incarcerated and/or detained in Iowa Department of Corrections facilities, including grievances discussing access to hygiene, protective equipment, medical treatment,



and/or other risks of exposure to COVID-19 within Iowa Department of Corrections facilities.

6. Related to COVID-19 related communications or complaints between and/or among Iowa Department of Corrections employees, including executive staff, facility supervisors and their staff, regarding employee access to hygiene, protective equipment, and/or other risks of exposure to COVID-19 within Iowa Department of Corrections facilities.
7. Regarding the most recent plan created prior to the COVID-19 pandemic that would be implemented to guide the Iowa Department of Corrections facilities in the event of a statewide infectious disease outbreak.
8. All records in the custody of the Governor's office that identify the model(s) and/or algorithm(s) upon which the Governor has relied upon from January 1, 2020 to estimate and/or predict COVID-19 infection rates and likely mortality throughout the state, including whether such models accounted for COVID-19 spread in and through Iowa Department of Corrections facilities.

Because the ACLU of Iowa is a non-profit public interest organization and a fee waiver in this case serves the public interest, we request a fee waiver.

If such a waiver is denied, please inform us prior to fulfilling the request and provide an itemized estimate of reasonable costs, so that we may discuss alternative and more cost-efficient methods to comply with this request.

If you expect a significant delay in responding to or in fulfilling this request, please contact the below email address with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and the appeal procedures available to me under the law.

I ask that any questions, responses or records produced please be directed to this email address: [COVID\\_FOIA@aclu.org](mailto:COVID_FOIA@aclu.org).

Thank you for considering this request.

Sincerely,

Rita Bettis Austen  
Legal Director  
ACLU of Iowa