

**The Iowa Public Information Board**

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<p>In re the Matter of:</p> <p>Curtis Bloes, Complainant</p> <p>And Concerning:</p> <p>Sac County Board of Supervisors, Respondent</p>	<p>Case Number: 26FC:0028</p> <p>Informal Resolution</p>
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On January 27, 2026, Curtis Bloes filed formal complaint 26FC:0028, alleging that the Sac County Board of Supervisors (Board) violated Iowa Code Chapter 21.

The IPIB accepted this complaint at its meeting on March 19, 2026.

**Background**

On January 27, 2026, the Sac County Board of Supervisors held a regularly scheduled meeting. The tentative agenda posted for this meeting was prepared using a standardized agenda template, with the date and topics to be discussed at the particular meeting added by hand. The printed portions of the agenda included a call to order, approval of previous minutes, approval of the agenda, and a citizen’s forum, followed by five blank lines for potential new business before the Board, a sixth printed new business line labeled “10:30 – ENGINEER,” and additional printed lines at the bottom of the template for “CLAIMS,” “DRAINAGE CLAIMS,” and “REPORTS, DRAINAGE REPAIRS AND OTHER ITEMS THAT DO NOT REQUIRE SPECIFIC TIME.”

The January 27 agenda included only one handwritten item, a wage adjustment for a named county employee. Following discussion of the wage adjustment, the Board proceeded to the “10:30 – ENGINEER” agenda item, under which they discussed bid results for pending county asphalt projects, then adopted Resolution 26-0127 to approve a contract worth \$2,635,891.74.

**Applicable Law**

“Except as provided in [Iowa Code § 21.4(3)], a governmental body shall give notice of the time, date, and place of each meeting including a reconvened meeting of the governmental body, and the tentative agenda of the meeting, in a manner reasonably calculated to apprise the public of that information.” Iowa Code § 21.4(1)(a).”

## Analysis

Iowa Code § 21.4(1)(a) provides advance notice requirements for meetings of governmental bodies. Required notice under this provision must include the time, date, place, and tentative agenda for any meeting.

According to the above section, a tentative agenda must be prepared “in a manner reasonably calculated to apprise the public” of matters to be discussed at an upcoming meeting. The Iowa Supreme Court has interpreted this requirement to entail advance notice for *any* item to be discussed at a Chapter 21 meeting, outside of rare cases for “discussion and action on emergency items that are first ascertained at a meeting for which proper notice was given” which cannot “be reasonably deferred to a later meeting.” *KCOB/KLVN, Inc. v. Jasper Cnty. Bd. of Sup’rs*, 473 N.W.2d 171, 174 (1991).

The applicable standard is “whether the notice sufficiently apprised the public and gave full opportunity for public knowledge and participation,” when considering “the public’s knowledge of an issue and actual participation in events in light of the history and background of that issue.” *Id.* at 173. In subsequent decisions, the Court has further clarified that “the adequacy of the notice must be determined on the basis of what the words in the agenda would mean to a typical citizen or member of the press who reads it.” *Barrett v. Lode*, 603 N.W.2d 766, 769 (Iowa 1999).

Relying on this judicial precedent, IPIB has identified certain categories of agenda items which may fail to provide sufficient notice, including “catch-all” umbrella phrases and single-word descriptions, which fail to adequately describe actual matters deliberated. *See* 20FC:0128, *Mark Kuhn/Floyd County Board of Supervisors* (finding that “Review/Action coronavirus (COVID-19) issues as applicable” was insufficient when reused over a period of several months to cover all possible county actions related to COVID-19 protection); 18FC:0061, *Lindsey Larrington/Lucas City Council* (finding that single-word agenda topics such as “Parks” or “Streets” were not descriptive enough on their own to apprise the public).

## Informal Resolution

Following IPIB’s acceptance of 26FC:0028, the Sac County Attorney worked with the Board of Supervisors on voluntary corrective measures to ensure best practices are followed for future meeting agendas. Implemented changes include requirements that agenda items be identified by their subject matter and the nature of the board’s potential action rather than the name of the presenter or department alone, specific designation of potential action items which may be voted on at each meeting, and an oversight step in which meeting agendas to be posted are sent to the County Attorney to ensure they provide sufficient notice. Information about Iowa Code § 21.4’s standard for notice has been disseminated throughout the county.

In addition to these voluntary measures, the parties have also reached an informal resolution. Pursuant to Iowa Code § 23.9, IPIB presents the following terms for an informal resolution of this matter:

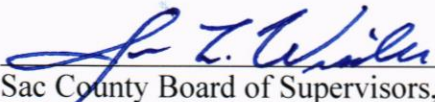
1. This Informal Resolution will be formally approved at a meeting of the Sac County Board of Supervisors. The Board will include a copy of this Informal Resolution in its meeting minutes and will provide IPIB staff with a copy of the minutes demonstrating approval.
2. In adopting this Informal Resolution, the Board acknowledges the standard described in the Analysis section as the appropriate legal standard for agenda notice under Iowa Code § 21.4(1)(a) and agrees to follow this standard in providing notice for its future meetings.
3. The Board will formally recertify its action on Resolution 26-0127 during a future open session meeting, with sufficient and timely agenda notice. Fulfillment of this term will not be understood to retroactively void the original resolution or change its effective date.
4. Members of the Sac County Board of Supervisors will complete training on Iowa's open meetings and public records laws. This training will be arranged by the Board and conducted with IPIB staff during an open session meeting.

The terms of the Informal Resolution will be completed within 60 days of the date of approval of this Informal Resolution by all parties. Upon showing of proof of compliance, the IPIB will dismiss this complaint as successfully resolved.

THIS INFORMAL RESOLUTION HAS BEEN REVIEWED AND APPROVED BY THE FOLLOWING PARTIES:

  
\_\_\_\_\_  
Curtis Bloes, Complainant

5/12/26  
Date

  
\_\_\_\_\_  
Sac County Board of Supervisors, Respondent

05-12-26  
Date