

Topic: **Sites Reservoir Project, Phase 1** **2017 Apr 14**

Subject: **Standard Practice for Basic Document Management**

Purpose: To implement a standard protocol for the distribution and sharing of (a) documents from a document's initial working-level draft through final and (b) electronic communication and distribution of concepts, ideas, or work products.

The procedure is intended to:

1. Include the ability for work products to be amended over time (i.e. have a version control process).
2. Help flag or easily identify (a) draft documents or communications that should not be kept in the ordinary course of business, (b) contains information that is confidential in nature (i.e. applicable for closed session discussions), or (c) contains information that is exempt from becoming public information as defined by the Public Records Act.
3. Given the breadth of document types and communications, that will be generated as this project advances, this standard practice is *not* intended to be a "one-size-fits-all" or prescriptive approach. Instead, this standard practice is intended to serve as an aide to project's members by providing minimum requirements. It should not supplant the use of professional judgement regarding how best to implement the intent of this standard practice.
4. Facilitate the sharing of information internally (i.e. signatories to either the Authority's Agreement or the Phase 1 Reservoir Committee Agreement) and externally (i.e. beyond the members to the Sites Reservoir Project), such as permitting agencies (i.e. cooperating, responsible, and trustee) and stakeholders essential to the project's implementation.

NOTE: This standard practice is intended to comply with all applicable state &/or federal laws related to the disclosure of information applicable to public agencies, such as and including the Sites Project Authority. As such, this standard practice will be revised as needed to incorporate current regulations, statutes, case law, and interpretation of compliance by the Authority's legal counsel.

References:

- Public Records Act CA Government Code §6250 - 6270.5 with specific reference to the list of exemptions listed in §6254.

website:

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=6254

- Confidentiality Agreements executed between the Authority and its Authority Members, Reservoir Committee Members, and others, or confidentiality provisions included in contracts and/or agreements.

Minimum Requirements:

1. **Expectation:** To the extent practicable, all documents, reports, memorandums, presentations, and records of communication (“Work Products”) should be prepared with the expectation that it may become publicly available. Especially, those Work Products that will be shared externally, since each agency has developed their own standards regarding compliance with the applicable state &/or federal laws related to the disclosure of information applicable to public agencies.
2. All Work Products shall contain a **date stamp**.
3. All documents shall contain a **unique page number** and either a file number or WBS Identifier¹.

NOTE: Once a project-level filing system has been developed that relates to the Projects’ work breakdown structure (“WBS Identifier”), the WBS identifier should also be included. In the meantime, individual file systems should be used. Consultants should use their unique contract number as the prefix to their WBS Identifier.

4. Signed and formal communications (Letters), external presentations, and final reports shall include the Sites Logo. Work products that are not intended to be kept in the ordinary course of business should not include this logo.
5. **Work Product Status Labeling:** The header shall include one of the following:
 - a. Draft documents shall include **“Preliminary Draft”** and when applicable, the appropriate version control label (refer to section 6), unless the date stamp is more appropriate. Once a document has been accepted or approved for use, no version control label is needed in the header.
 - b. Work Products² that include some form of strategy or legal implications (i.e. contain other than strictly factual information), and potentially including opinions or recommendations intended to foster the

¹ Electronic communications are currently exempt from this requirement.

² Includes electronic communications, which ideally should be included in the subject line or the first line of the email.

deliberative process, shall be labeled "**attorney-client communication**". Distribution of these Work Products shall include the appropriate legal counsel to the Authority, which currently consists of special counsel for NEPA/CEQA and ESA/CESA and general counsel for all other matters.

- c. For Work Products containing matters that are intended to be brought to the Board for discussion in closed session shall be sent to the Authority's legal counsel for further distribution and labeling requirements. When sending an item to legal counsel, include "**potential closed session item**" in the subject line.
- d. For all other documents, use of a status label is not required and is deemed optional. Any such labeling should be used sparingly with the purpose to flag to the reader's attention, any limitation on the redistribution and/or use of the document.

6. Document's **Version Control Labeling**³:

- a. Documents that are expected to be revised at least in subsequent phases of the project and are substantive, should include a revision block that can summarize the document's evolution.
- b. For initial draft documents, the alphabetical sequence should be used (i.e. a through z).
- c. Once a document has been deemed to suitable for public distribution, the numeric sequence should be used (i.e. 1 through 100).
- d. Where documents have been previously approved for use and are in the process of being revised or updated, the version should use the numeric sequence as the prefix followed by the alphabetical sequence (e.g. 1a through 1z). Once the revised document has been accepted or approved for use it should reflect the next numeric value in the sequence (e.g. approval of draft version labeled 1d becomes version 2).

7. **Location** of Date Stamp, WBS Identifier, Version Control, Revision Block, and Disclaimers/ other contextual or "metadata":

- These items only need to be provided once in a Work Product and can appear after any cover page and before or with a table of contents.

³ Electronic communications and presentations are exempt from having to use a version control identifier. However, any email attachments should include the appropriate version control identifier.

Exception, which require all pages to be labeled are listed in Paragraph 8.

- For correspondences and documents less than 10 pages, the date should appear in the header. The footer should contain the file (or WBS identifier), page number, and version control label⁴.
 - For all other reports, presentations, and documents larger than 10 pages, the footer should be used and the revision block should be included after the table of contents.
 - Any disclaimers &/or other relevant advisory information should be provided in the footer.
8. List of Work Products that are required to have the labeling appear on each page shall include those that include the following labels:
- "attorney-client communication"
 - "potential closed session item"

⁴ Presentations and signed, formal communications are exempt from having to include the version control code. However, drafts circulated for input should include the version control code.