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SITES PROJECT AUTHORITY RECORDS MANAGEMENT POLICY

1. Purpose

The Records Management Policy establishes management, maintenance and accessibility of records for the Sites Project Authority in compliance with the California Public Records Act. (Public Records Act) (Government Code Section ~~7920.000 6250~~ **7920.000 6250** *et seq*).

2. Definitions

Requester: Refers to any individual requesting access to, inspection of, or copies of Sites Project Authority records.

Record: Has the same meaning as “public records” as defined in subdivision (e) of California Government Code Section §~~7920.530 6252~~ **7920.530 6252**. Records are any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by the agency regardless of physical form or characteristics.

3. Policy

Records Management

The Sites Project Authority retains records of the agency and effective retention and storage of records, management of records, and information collection practices by establishing and maintaining an active records management program while ensuring compliance with the Public Records Act.

Public Records

The Sites Project Authority provides public access to Sites Project Authority records upon request in compliance with the Public Records Act.

The Sites Project Authority reserves all available exceptions and exemptions from to disclosure of Records as provided under the Public Records Act and decisions of the California Courts interpreting the same.

Consistent with applicable case law interpreting and applying the Public Records Act, new records will not be created to respond to requests.

4. Roles and Responsibilities

Sites Authority Board and Reservoir Committee Members

The Sites Project Authority does not create or maintain records on behalf of any participating agency. Members of the Sites governing boards are subject to compliance with this Records Management Policy.

Contracted Service Providers

Contracted service providers shall perform and maintain appropriate processes and systems to comply with the Public Records Act, the respective executed contract between the service provider and the Sites Project Authority, and this Policy by making records generated in performing their work for the Sites Project Authority available as records of the agency upon request by the Authority.

Program Operations Manager

The Program Operations Manager shall be responsible for overseeing the Sites Project Authority's records management activities and assure the Authority remains in full compliance with this Policy at all times.

Requester

Requesters are **required** to make a focused and effective request that reasonably describes an identifiable Record or Records. The Authority shall make reasonable efforts to assist the requester in making a focused and effective request. A requester is encouraged to include the following information to facilitate a focused response by the Sites Project Authority regarding the requested Records:

- The subject of the Record
- A clear, concise, and specific description of the Record(s) being requested
- The date(s) of the Record(s), or a time period for the request (e.g.: calendar year 2019)
- Full names for the individuals and/or agencies included in the request, including proper spelling
- Any additional information that helps identify the Record(s) being requested
- Contact information for response to the request, preferably an email address

Requesters are invited to research the Records being sought prior to submitting a request, including a detailed review of the Sites Project Authority website, which contains a vast amount of information, resources and Records, and which the Sites Project Authority makes a diligent effort to maintain.

Records Administrator

Under the supervision of the Program Operations Manager, the Records Administrator will administer an efficient Records management procedure and procedure for responding to public records requests and for managing the Authority’s Records in compliance with this Policy.

5. Process

Records will be retained and discarded in a manner consistent with the attached Records Retention Schedule.

All Records requests will be reviewed by the Program Operations Manager, Records Administrator, and Legal Counsel as needed.

6. Reporting

The Reservoir Committee and Authority Board will receive an informational report of public records requests and notice of completion of responses.

7. Attachments:

Records Retention Schedule

8. Fee Schedule:

Requests for copies of records, for which fees are not otherwise set by law, shall be subject to the following fees:

First page.....	\$1.00
Each additional page.....	\$0.25
Front/Back copying.....	additional \$.10 per page
Copying on paper other than 8.5 x 11.....	actual cost
Color Copies.....	actual cost
Deposit required if estimated copying costs exceed.....	\$25.00

9. References

California Public Records Act (Government Code Section 7920.000 et seq.)

California Secretary of State

Records Retention Schedule Addendum A

The Sites Project Authority Records Retention schedule is based on the **Local Government Records Program GC Section 122236** ~~2021 California State Records Management Handbook~~. It has been adapted for use by the Sites Project Authority. The timelines below are the minimum retention timelines for the specified documents, but documents may be retained for additional time. The Records Retention Schedule can be modified to provide additional detail concerning more specific documents.

Records Retention Schedule	
Records	Minimum Retention Period
Organizational Records	
Articles of incorporation	Permanent
Application for exempt status	Permanent
Bylaws	Permanent
Authority Board Adopted Policies and operating procedures	Permanent
Authority Board and Reservoir Committee meeting minutes and materials including Agendas and Staff Reports	Permanent
Form 700	4 years
Workshops, Town Halls, and other significant project meeting materials	5 years
Authority Board and Reservoir Committee Meeting Recordings	1 day after the approval of the respective minutes
Correspondence	7 years
Public Records Request	5 years
Other documents not defined	1 year
Accounting Records	
Chart of accounts	Permanent
Annual financial statements	Permanent
Annual audit reports	Permanent
General ledger	20 years
Monthly financial statements	6 years
Quarterly financial statements	6 years
Journal entries	6 years
Accounts payable ledger	6 years

Records Retention Schedule	
Records	Minimum Retention Period
Accounts receivable ledger	6 years
Expense records	6 years
All other accounting records (including budgets)	6 years
Invoices/Progress Reports (submitted to Funding entities) <ul style="list-style-type: none"> • California Water Commission Invoices <ul style="list-style-type: none"> ○ Progress Reports • California Water Commission Quarterly Reports • Financial Assistance Agreement Financial Reports <ul style="list-style-type: none"> ○ Performance Reports • USDA Loan Status Reports 	Permanent
Support documents for Invoices submitted to Funding entities <ul style="list-style-type: none"> • Invoice Calculation Spreadsheets • Payment Requests • FAA Invoice Backup 	6 years
All other Invoices	6 Years
Bank statements	3 years
Bank reconciliations	3 years
Checks/Payments Received	6 years
Canceled checks	3 years
Stop payment orders	3 years
Check signature authorizations	3 years
All other bank records	3 years
Tax Records	
Tax returns	Permanent
Form 990 and supporting documentation	Permanent
1099 forms	8 years
All other tax return records	6 years
Supporting documentation for taxes	4 years
Real Estate Records	
Escrow documents	3 years after close

Records Retention Schedule	
Records	Minimum Retention Period
Deeds	Permanent
Option Agreements	5 years after fulfillment or expiration of agreement
First Rights of Refusal Agreement	3 years after fulfillment or expiration of agreement
Purchase/Sale Agreements	Permanent
Leases	3 years after fulfillment or expiration of agreement
All other real estate records	3 years
Insurance Records	
Policies	5 years
Claims	5 years
All other Insurance records	5 years
Legal Records	
Contracts and Agreements (including Task Orders and Amendments)	Permanent
All other legal records (that do not fit into a defined category in this table)	10 years
Personal injury records	8 years
All other leases	6 years after termination
Litigation claims	5 years following close of case
Court documents and records	5 years following close of case
Deposition transcripts	5 years following close of case
Discovery materials	5 years following close of case
Environmental and Permitting Records	
CEQA Administrative Record ¹	10 years after close of project ²
Permits and Supporting Documents	10 years after close of project ²

¹ Public Resources Code Section 21167.6 (e) provides a list of the types of documents that comprise an administrative record, included as Appendix B to the Records Management Procedure. It is the responsibility of the Authority, as lead agency to retain relevant records, many of which may be generated by consultants. If there is a CEQA challenge, legal counsel would ultimately be responsible for the selection of files to be included in the administrative record.

² The Authority maintains a list of projects on SharePoint including file storage location and close date as applicable.

Records Retention Schedule	
Records	Minimum Retention Period
Water Right and Supporting Documents	Permanent
Engineering Records	
Final reports and/or memoranda	Permanent
Final construction contract documents (including plans, specifications, cost estimates, and CAD/BIM files)	Permanent
Construction as-built documentation	Permanent
Records given/sent to any third party or government agency	10 years after close of project ²
Meeting minutes	10 years after close of project ²
Manifests/Waste Disposal	10 years after close of project ²
Geotechnical samples/cores	10 years after close of project ² with consideration for permanent long-term storage of limited records
Temporary Project records	10 years after close of project ²
Technical Project Support Records	
Work Plans and Work Plan Updates	Permanent
Project Schedules	10 years
Final reports	Permanent
Final technical memoranda	Permanent
GIS Data collected in support of technical documents and activities	10 years
Final data collection/analysis/modeling output supporting key deliverables	10 years after close of project ²
Meeting minutes, including meetings with committees and third parties	5 years after close of project ²
Proposals in response to Authority solicitations	2 years
Final Cost estimates	10 years after close of project ²
Correspondence, if formal correspondence, in whatever form, with any third party or government agency including member agencies.	5 years after close of project ²

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