

SACRAMENTO CENTRAL GROUNDWATER AUTHORITY

Records Management Policy

1. Purpose

The purpose of this Records Management Retention Policy is to ensure that the Sacramento Central Groundwater Authority (SCGA or Authority) creates, maintains, protects, and disposes of agency records in a manner that:

- Complies with applicable federal, state, and local laws.
- Supports transparency, public access, and accountability.
- Promotes efficiency in operations.
- Preserves records of long-term administrative, legal, fiscal, and historical value.

This Policy establishes the framework SCGA uses to classify, store, retain, and dispose of records. The specific retention periods and disposition instructions for each record series are included in Attachment A (SCGA Records Retention Schedule).

2. Authority

This Policy is adopted pursuant to, and shall be interpreted consistently with:

- The California Public Records Act (Gov. Code 6250 et seq.).
- Government Code provisions governing retention and destruction of local agency records (e.g., 34090 et seq.).
- Applicable state laws relating to the creation, preservation, and accessibility of public records.
- The SCGA Joint Powers Agreement and any Board-adopted governance documents.
- Relevant administrative, legal, and regulatory requirements associated with groundwater management.

If Attachment A conflicts with mandatory legal requirements, such legal requirements shall control.

3. Definitions

For purposes of this Policy:

Record: Any writing retained by SCGA in the ordinary course of business, regardless of physical form or characteristics, that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the Authority. Writing includes any

handwriting, typewriting, printing, photocopy, photograph, email, text message, electronic file, audio or video recording, map, drawing, or other recorded form of information.

Non-Record: Materials not required to be retained as evidence of SCGA activities, including convenience copies, duplicates, drafts no longer needed once a final version exists, personal notes, preliminary working materials, and reference documents not created by SCGA.

Retention Period: The minimum time a record series must be retained before it may be destroyed or archived, as listed in Attachment A.

Official Record: The designated authoritative version of a record that SCGA relies upon for legal, fiscal, administrative, or historical purposes.

Active Record: A record needed for routine business operations or reference.

Inactive Record: A record no longer needed for routine operations but still requiring retention for legal, historical, or administrative purposes.

Trusted System: A combination of policies, procedures, and technologies that ensures reliable and authentic electronic records storage consistent with industry and statutory standards.

Legal Hold: A directive suspending routine destruction of records that may be relevant to ongoing or reasonably anticipated litigation, audits, investigations, or regulatory inquiries.

Transitory Record: Documents or messages with short-term, limited administrative value that do not set policy, document decisions, or certify transactions, and may be deleted once their purpose is served.

4. Roles and Responsibilities

4.1 Board of Directors

The Board of Directors establishes this Policy and approves any amendments to the Policy. The Board may also adopt supplemental policies related to records, transparency, or public access.

4.2 Executive Director

The Executive Director provides overall oversight of the records management program and is responsible for:

- Ensuring implementation of the Policy.

- Approving destruction of records in accordance with Attachment A.
- Allocating necessary resources for proper storage and security.
- Delegating tasks as needed.

4.3 Clerk of the Board

The Clerk of the Board serves as the primary custodian of SCGA's Official Records and is responsible for:

- Maintaining Board and Committee records (agendas, packets, minutes, resolutions, and related materials for Brown Act bodies).
- Managing the Records Retention Schedule (Attachment A).
- Coordinating storage, retention, transfer, and disposition of records.
- Documenting destruction actions.
- Administering Public Records Act (PRA) requests.
- Coordinating with the Executive Director and Agency Legal Counsel on legal holds.

4.4 Legal Counsel

Legal Counsel advises SCGA regarding:

- Legal requirements related to records.
- Litigation, discovery, and legal holds.
- PRA exemptions and review.
- Preservation obligations when litigation is anticipated.

4.5 Staff and Consultants

All SCGA staff and consultants who create or maintain records must:

- Comply with this Policy and Attachment A.
- Store records in approved locations.
- Protect confidential or sensitive information.
- Transfer records to the Clerk when required.
- Follow legal hold directives.

5. Standards for Records Management

5.1 Creation and Classification of Records

Records shall be created, maintained, and classified in a manner that ensures:

- Accuracy and completeness.
- Clear file naming and organization.
- Accessibility for authorized users.
- Consistency with the categories and record series set forth in Attachment A.

5.2 Storage and Organization

Records shall be stored in secure, organized, and accessible locations that:

- Allow timely retrieval.
- Protect records from loss, alteration, or unauthorized access.
- Facilitate backup and disaster recovery.
- Support long-term preservation for permanent or archival records.

5.3 Electronic Records

Electronic records shall be maintained in systems that:

- Ensure integrity, authenticity, and reliability.
- Support search and retrieval.
- Provide proper backup and redundancy.
- Meet Trusted System standards when used for long-term retention.

5.4 Confidentiality and Security

Confidential or sensitive records must be stored securely and accessible only to authorized individuals. Records containing personal, privileged, or confidential information must be destroyed in a manner ensuring they cannot be reconstructed.

5.5 Document Conversion and Migration

When converting physical records to electronic format or vice versa, SCGA must ensure:

- Image quality and accuracy.
- Preservation of metadata.
- Integrity of the original content.
- Compliance with Trusted System requirements.

6. Records Retention Schedule

Attachment A establishes:

- SCGA's official record categories and record series.
- Retention periods for each series.
- Disposition requirements (destroy, archive, permanent).
- Custodians, when applicable.

Records must be retained for at least the minimum period specified in Attachment A. If other laws, contracts, or business needs require longer retention, the longer period controls. The Clerk may recommend updates to Attachment A in coordination with the Executive Director and Legal Counsel. Updates shall be approved consistent with Board policy.

7. Destruction of Records

7.1 General Rule

Records may only be destroyed when:

- Their retention period has expired.
- No legal hold applies.
- The Executive Director or designee has authorized destruction.

7.2 Approval and Documentation

The Clerk must:

- Prepare a list of records proposed for destruction.
- Verify retention periods.
- Confirm no legal holds exist.
- Obtain authorization.
- Maintain a permanent log of destruction.

7.3 Secure Destruction Methods

Records must be destroyed in a manner appropriate for their format and sensitivity, such as:

- Shredding or pulping physical records.
- Secure deletion or overwriting of electronic records.
- Destruction by a qualified vendor with a certificate of destruction.

7.4 Duplicates and Non-Records

Duplicate copies or Non-Records may be destroyed when no longer needed, provided the Official Record is retained and no legal hold applies.

8. Legal Holds

When litigation, investigations, audits, or similar proceedings are pending or reasonably anticipated:

- The Clerk, at the direction of Legal Counsel or the Executive Director, will issue a legal hold notice.
- All destruction of relevant records is suspended.
- Staff and consultants must preserve all records covered by the hold.
- The hold will remain in effect until formally released by Legal Counsel.

9. Email and Electronic Communications

Electronic communications such as email, text messages, and instant messages may constitute Records if they document SCGA business. If a communication qualifies as a Record, it must be:

- Saved or filed into the appropriate system or folder.
- Retained according to the retention period applicable to its content.

Transitory Records may be deleted once their purpose is served, unless a legal hold is in place.

10. Public Records Act Requests

The Clerk coordinates SCGA's responses to PRA requests. PRA logs and response records shall be retained in accordance with Attachment A. Nothing in this Policy limits the public's rights under the PRA or any other law requiring record disclosure.

11. Training and Review

SCGA will provide periodic training to staff and consultants regarding this Policy, Attachment A, and related procedures. The Policy and Attachment A will be reviewed periodically and updated as needed to remain current with legal requirements, operational needs, and best practices.

Policy Information and Version History

Policy Title	Records Management Policy
---------------------	---------------------------

Approved By	SCGA Board of Directors
Resolution No.	2026-01
Effective Date	02-12-2026
Review Cycle	Every three years or as needed
Summary	Initial adoption of Records Management Retention Policy and Attachment A.
