

**Records Policy and Procedures at the  
Central Utah Water Conservancy District**

Background on CUWCD

We were established in 1964 to contract with the US government in connection with the construction, operation, and financing of the CUP, which consists of a series of dams, pipelines, reservoirs, tunnels and aqueducts designed to meet the water needs for the ten counties in our District. We educate on water conservation and provide drinking water through 3 water treatment plants. We have offices in Orem, Vernal and Duchesne. We're large in what we do but have only around 80 employees.

Our records system is primarily a centralized system. For the most part all records created and received by the District are imaged as tiffs or jpegs into an electronic records system, indexed and stored in our records department. There are a few exceptions in that some original records after being imaged and indexed are returned to be stored at one of our off-site facilities. However, the majority of records are imaged, indexed and stored centrally.

**About Policy**

- Policy should explain the organizations stand on the subject. The policy establishes a guideline for employees. It deals with the “what” and “why”.
- The policy then needs to be supplemented with procedures. A procedure is the “how”. It tells employees how to achieve the necessary results.
  - For example, You can't say “it's our policy to develop, organize and manage our assets” then leave it at that. You have to tell employees how they are going to do that. Policy and Procedures go hand in hand.

## **What we're doing now....**

Our records policy is contained in our Records Management Policy and Procedures Handbook. Our handbook includes:

- references to law applicable to our records policy.
- purpose and background of the policy and procedures.
- policy statement
- procedures including applicable appendices
- an acknowledgement statement that each employee must sign which acknowledges they have read the policy handbook, can consult the Records Manager with questions, and understand how revisions are handled.

That's the basic content of our Records Policy and Procedures Handbook.

What our policy basically says is that the “District owns all business records created and received and that each employee is responsible for managing these records in accordance with the procedures spelled out in our Records Policy and Procedures Handbook.”

Now that may be simplistic but that is simply what we want. We want employees to manage District records by following the procedures outlined with the policy. So how they do what our policy says is what we spell out in our procedures.

The procedures that our employees are required to follow can be summed up in about 11 sections. These procedures apply to paper records, electronic records, photographs, email, etc. The format of our records **does not** change what is expected in our policy.

## Section 1, What Is and Is Not a Record

Employees must know this in order to be able to manage what we want them to manage.

## Section 2, How to Code Records

Because records are all coming to a central place, we have a file coding system (or taxonomy) that employees use to identify what “project” the document is associated with (*for some of you it may be what department the document is associated with*) and what the document type is (i.e., a letter, a report, agreements, meeting minutes, etc.). These file codes make it easy for the records department to track the retention of specific documents, their classification, makes it easier to organize them, and help locate them in the case of litigation, public requests for records, or when an employee wants a document.

Every document that an employee manages requires a code assigned to it.

## Section 3, How to Duplicate Records for Employee Use

This is unique to us. And, is a section that has not always existed. Even though most things are created electronically, there are still ample amounts of paper. What this procedure does is tell the employees how to identify copies they keep for themselves that they have already sent to the Records Department. The need came about because so much paper is still retained and when employees’ retired or quit it was difficult to go through offices and know what had been centrally filed and what had not. There were other reasons too, but I point this out because you will likely find as you create procedures to go with your records policy that there are things unique to how you operate that you would want to include in procedures.

#### Section 4, Submit Records

Because records are centralized, we must tell employees how to submit their records. We address submitting paper records, electronic records, PowerPoint presentations, boxed records, and email (and as far as email goes there is a supplement to the Handbook that speaks specifically to email policy and procedures). Email is different enough that we wanted it to have a separate more detailed procedure section specific to how employees were going to send it to that central location.

#### Section 5, Retrieve and Check Out Records

If we're expecting everything to be centralized, then employees have to know and be comfortable that those records they are giving up are retrievable. If employees fear they can't get their documents back, they may be hesitant to send them or they may unnecessarily keep extra copies around. So it was important to put this section in our procedures so employees could see there was a way for them to retrieve what they sent to us. And as employees use the system and see they can easily locate their records, compliance with submitting records increases.

#### Section 6, Public Requests for Records

We want employees to know who to refer members of the public to if they want a District record. And, we want them to know it is not okay for them to provide District records themselves.

#### Section 7, Destroy Records

One of the ways employees manage District records is by destroying non-records and complying with destruction notices. They are told what the destruction notice is and what they are to do when they see one. All employees have

access to our Retention Schedule. They are also told in this section about preserving records and non-records related to litigation because litigation trumps retention schedules.

#### Section 8, Lawsuits and Litigation Holds

Employees are told what they do if they believe the organization may be sued -- what their responsibility is and who to notify. This section describes what a litigation hold looks like, they are carried out and what the employee's role is related to the holds.

#### Section 9, How to Safeguard Private, Protected, or Confidential Information

We list here are the duties the employee has for their desk and desktop and the duties that the District has, specifically in relation to the requirements of GRAMA.

#### Section 10, New Project Numbers or New Document Types

Employees are given instruction on how to let the records department know when a project has been completed, when a new project is beginning or if they believe a new document type needs to be made. It's important for employees following policy and procedures to feel like they have a way to provide input that may affect them.

#### Section 11, Get Training

This is the most important procedure in connection with your policy and procedures. We require employees to attend records training at least once a year. This is a mandatory training requirement supported by our General Manager. So far we have not tied it to performance evaluations but that could be an option for the future.

You train so employees are comfortable and confident they know how to carry out the policies and procedures.

You document that training by having attendees sign an attendance sheet.

You are certainly more able to defend a policy and procedure that you have trained on. You can't train employees the day you hire them, and think you have a defense when your employees don't follow the policy 5 years later.

Those are our basic procedures which tie to our policy. The sections I just addressed in our policy and procedures handbook consists of about 20 pages, so it's not lengthy at all. In fact, this handbook has really been reduced in size over the years to be more concise and better reflect what we expect of our employees when it comes to records management.

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Additional things to consider:

- Plan on reviewing your policy and procedures once a year. Things change, new technology affects what we're doing, your organizational view may change, or you may find a better way to do what you are already doing, funding may affect your procedures. Our Records policy and procedures look significantly different now than they did 10 years ago. So, review is important.
- Plan a way to audit what employees are doing. This is something we are going to try to do better in the coming years, so that we can see exactly where our procedures may need adjustment.

## **What we are looking to accomplish in the coming year...**

What we will be addressing this coming year is managing records on our network drives and this will include the management of some electronic records in their native formats.

I am not aware of a legal requirement that says, “You must maintain all records in their native formats.” Apart from the Federal Rules of Civil Procedure, or a specific law for specific documents, we can maintain our records in the format that fits our needs and allows us to preserve them.

Because our records management policy/procedures require employees to send all records to a central location, those files left on network drives should be either duplicates of what has been filed or working records that can be destroyed when the need for them ends. (This is where some auditing can be helpful.)

Now this being said, it is definitely in our best interest to manage our network drives (whether the “official” record copy is on them or not), so we can purge as necessary and manage what is on those drives. We all know those items on network drives are still discoverable when lawsuits arise. It may not matter that they are duplicates or working copies. So it’s in our best interest to manage those records.

One idea we are looking at is setting up our network drives and folders so that they are an exact match to our file codes. And, requiring employees to store all records on the network according to what their retention or coding is. This is something that will require renaming many, many folders and definitely will not be easy for us to do or for our employees to embrace, but it’s definitely a direction we need to pursue.

One of the reasons that we require all District records imaged in a central location as tiff or jpeg images, is if you're managing your records in their native format, then you must guarantee survival in that format throughout their retention. You can't just let them sit in their native format on your computer systems, as organized as they may be, without another thought. You must have migration procedures in place and have someone always on top of migrating the potentially hundreds or thousands of records that are in their native formats.

Now is this doable? I'm certain it's doable. Is it cost-effective? For us right now no.

As we do look at our network drives and how to better manage them, there will be electronic documents that we want to maintain in their native format. It just won't be all electronic documents. Specifically, we will likely want to retain and have a migration plan for AutoCAD files (these are drawing files) and some spreadsheets that contain formulas important to keep with the information.

But imaging letters, certain reports, meeting minutes, financial information, human resource records, etc., as tiff images is certainly sufficient and will be desirable for us for a number of reasons.

I want to leave you with a statement I heard a number of years ago at a meeting that I'm going to attribute to one of my ARMA colleagues, Brian Winterowd. It may not be his own quote and he may have been quoting someone else; but, in any event, the statement made an impact on me. What he said was, "Don't give up the good you can do for your company waiting on the perfect." This has helped me in not feeling so overwhelmed by all that I have to address as a Records Manager. I have been able to step back and say, "there may be a more perfect way to do this, but right now I'm going to do the best I can with what I've got and feel good about it."

You can't be afraid to take a step forward because it might not be the perfect step; take a step forward anyway.

We believe what we are doing at the District is good policy, maybe not perfect, but our records policy and procedures are working for us. And, we will review and improve them each year.

I hope this review of how we are dealing with records policy and procedures at the District has been helpful to you and that you've been able to pick up some ideas from it.

*Presented by  
Chris Calton, Records Manager  
Central Utah Water Conservancy District  
(801) 226-7146  
chris@cuwcd.com*