

**COUNTY OF MONTEREY, CALIFORNIA
BOARD OF SUPERVISORS POLICY**

COUNTY RECORDS MANAGEMENT POLICY

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Glossary

As used in this policy, the following terms shall have the following meanings:

“Accession” means the process whereby the County Archives accepts transfer from a County department of records of permanent value which the department selects for preservation and which are brought within the County Archives’ systems of physical and intellectual control.

“Archival custody” means the state of records once accessioned by the County Archives, and in which the County Archives accepts responsibility for appropriately maintaining those records, which includes planning and budgeting for their preservation, and for providing access in accordance with all applicable statutes, regulations, policies and procedures.

“Copy of record” means the copy of a record designated as the official copy.

“County Archives” means a facility for the collection, preservation, and use of records of permanent value transferred by departments to the County Archives, and which is managed and operated to generally accepted standards of archival practice. Departments transfer legal custody of records that they choose to transfer to the County Archives, although legal, regulatory and procedural restrictions regarding access to those records remain in effect.

“County Records Retention Center” means a facility for the cost-effective storage and disposition of records of temporary value managed and operated to generally accepted records management standards. Departments retain legal custody of the records they choose to house in the County Records Retention Center.

“Department” means every County office, department, group of departments, division, bureau, board, and commission that is not an entity separate from the County.

“Destruction” of records means the physical disposal (shredding, etc.) or deletion of the record by a certified destruction source, indicating that it is no longer a record maintained by the County, rendering it inaccessible by proof of a document or manifest of destruction.

“Duplicate” means any accurate and unabridged copy of a record or series of records.

“Non-records” means duplicates or other copies of records made solely for convenience or reference; working papers such as rough notes, calculations or drafts assembled or created and used in the preparation or analysis of other

documents; appointment logs; stocks of blank forms or publications; or library or museum material intended solely for reference or exhibit.

“Official Record” means the record designated as the official record for the County:

- a. For records originating from a County department, the department which prepared the record shall retain and be responsible for the Official Record.
- b. For records received by one or more County department, the first addressee on the record shall maintain and be responsible for the Official Record.
- c. If the record originates in one County department and is transmitted to the Board of Supervisors for formal action, the Official Record shall be the one maintained by the Clerk of the Board.

“Permanent value” as applied to records means there is no termination or end point to the value of maintaining the records, and that they or their appropriate surrogate are intended to be available indefinitely.

“Records” means all papers, maps, plans, photographic films and prints, microfilm or other microformats, electronic data, audio and visual materials, and other documents, regardless of physical form or characteristics, which are produced, received, owned, used, or retained by a department in the regular course of transacting official County business.

“Reformatting” means to copy the content, structure, and context of records to another medium, whether analog or digital, in such a way that the copy may act as a satisfactory surrogate for the original. This requires meeting accepted national standards for particular processes and media, including indexing and searchability. It also requires assuring that appropriate “reader/printer” capabilities are maintained so that the reformatted material is still accessible.

“Responsible recordkeeping” is a generally accepted term that means creating, receiving, maintaining, and making available records in an efficient and cost-effective manner which conforms with all applicable statutes and regulations, supports business processes, and meets the responsibilities placed on public agencies to safeguard rights and ensure accountability.

“Retention period” means the length of time a record must be retained to fulfill its administrative, fiscal and/or legal function.

“Retention schedule” means a list of all categories of records produced or maintained by a department or agency, and the required and approved actions to be taken with regard to those records, including establishing their retention period.

“Temporary value” as applied to records means there is a termination or end point to the value of maintaining the records, and that they are intended to be destroyed of at that point.

"Trusted system" means a combination of techniques, policies, and procedures within which there is no plausible scenario in which a document retrieved from or reproduced by that system could differ substantially from the document as originally stored.

Part A. General

Section A.1. Title

This policy shall be known as the County “Records Management Policy.”

Section A.2. Findings

The Board of Supervisors finds that in order to safeguard rights and ensure accountability, it is in the best interests of the County and the citizens thereof, and essential for the administration of county government, to create, receive, maintain, and make available accurate and reliable county records; and that the most effective way to ensure this is to apply consistent standards of responsible recordkeeping across all County departments.

Section A.3. Authority

This policy is adopted in consideration of the provisions of Government Code §6250 *et seq.* pertaining to the availability and accessibility of public records; Government Code §§26201-26202.6 and §§26205-26205.8 pertaining to the Board of Supervisors’ responsibilities regarding the retention and destruction of County records; in accordance with Government Code §12168 *et seq.* pertaining to establishing standards; in accordance with the Secretary of State Local Government Guidelines, and other applicable laws or regulations.

Section A.4. Purpose and intent

It is the purpose and intent of this policy to establish a uniform program of responsible recordkeeping applicable to all County departments in accordance with applicable law. By doing so, it is the goal of the Board of Supervisors to:

a. SAVE SPACE by removing from offices records not required for the day-to-day operations; by removing from storage areas records that no longer have significant value; and by maintaining a consistent flow of records from office space to off-site storage to destruction.

b. SAVE MONEY by better utilization of office space and imaging technology for active records; by restricting the use of leased space for storage of inactive records; by controlling the purchase of equipment and supplies to file inactive records; by providing cost effective storage

facilities for inactive records; and by encouraging the use of automated micrographic systems for active, long term and archival records.

c. SAVE TIME AND LABOR in locating records by removing inactive records from office files; by centrally locating inactive records in an off-site facility; by maintaining a computerized records management system which provides for retrieval and accounting of off-site records and utilizing imaging technology and automation for active records retrieval.

d. SIMPLIFY record keeping and promote efficient access to records.

e. ESTABLISH BASIC STANDARDS for the transfer and conversion of paper records to electronic or other accepted formats, consistent with applicable law.

f. PRESERVE AND PROTECT documents of historical significance and/or archival value.

Section A.5. Applicability

This policy and the standards for responsible recordkeeping developed under its authority apply to all County departments. All records, as defined above, are records of the County and are not records of individuals, including staff, employees, and elected officials.

Part B. County Records Management Program responsibilities

Section B.1. Responsibilities – County Administrative Office

The County Administrative Office (CAO) is charged with the development and implementation of procedures for the management of records consistent with this policy. The CAO shall periodically survey departmental records management practices, and where appropriate recommend improvements in those practices. This shall include assessing use of space, equipment, systems and supplies necessary and appropriate to create, receive, maintain, store, archive and make available records.

Section B.2. Responsibilities – County Records Retention Center

To make available cost-effective storage, access, and disposal for County records of temporary value, the CAO shall manage and operate the official County Records Retention Center following generally accepted records management standards. Preferably, County records with limited retention periods that are not immediately required to support day-to-day business, as appropriate, should be stored at the County Records Retention Center (“RRC”) for the remainder of their retention period. Any alternative records storage facilities used by departments to store County records, such as leased facilities or third party vendors, shall meet appropriate guidelines for secure records

storage developed by CAO based on generally accepted best practices and legal requirements. County records shall only be stored in facilities with fire warning and suppression systems, and with adequate security to prevent unauthorized access to, or interference with, the records.

Each department shall be responsible for ensuring that such department's records stored either at the RRC or any other approved offsite location, shall be properly indexed, with the original of the index retained by the responsible department and a copy provided to the RRC. For the purposes of this policy, all offsite storage locations must have the written pre-approval of the CAO or designee. Any offsite storage which exists at the time of the adoption of this policy shall be brought into compliance with this policy within two years or be transferred to the RRC.

The intent of this Policy to have departments utilize the RRC to the greatest extent possible, in order to have consistent treatment of records and achieve economies of scale with the goal of reducing all departmental records storage costs. After the phase in period for this Policy, departments should not use third party vendors unless the department can show that the workload of the RRC is such that management of records would be adversely affected, or that the third party vendor costs are significantly lower for the department than RRC charges.

Section B.3. Responsibilities – County Archives

The County intends to develop in the future an official County Archives program to identify, collect, preserve, and make available the County's documentary heritage of records of permanent value. The CAO shall work with the Monterey County Free Library System and contact potential community partners to establish a County Archive program. The County Archives program shall follow generally accepted standards of archival practice.

In order to ensure preservation of records in a cost effective manner, departments should transfer County records of permanent value to the County Archives as soon as practicable once the program is established. County departments should work with the CAO as applicable to develop procedures that balance the need to preserve records of permanent value with continuing department business need for access to them.

Section B.4. Responsibilities – custody, control of, and access to records

The rights of legal custody and control of records that departments store in the RRC (or elsewhere) remain with the departments, which are responsible for granting access to County employees or members of the public in accordance with all applicable statutes, regulations, policies, and procedures. Any and all legal restrictions regarding access to records shall remain in effect while stored at the RRC on behalf of departments. Any County officer or employee having custody or control of any County records shall, at the expiration of their term of office, appointment, or employment, deliver custody and control of all records

kept or received by them to their successors or supervisors, or to the RRC if appropriate and as directed. All records in the possession of any County department shall, upon termination of activities of such department, be transferred to any successor department or to the RRC as appropriate, provided that such transfer of custody and control is consistent with the formal provisions of such termination.

Section B.5. Responsibilities – departmental cooperation

County departments shall cooperate with CAO to meet the intent of this policy, follow the guidelines for responsible recordkeeping established under this policy, and develop department policies and procedures in accordance with those guidelines. Each County department shall designate an individual, or individuals, to assist with and be directly responsible for implementing this policy. The CAO shall arrange to provide regular training to assist and support those departmental personnel. All departments are required to prepare an indexing system that is searchable and complies with County standards that allows for easy retrieval and identification of records for records management purposes.

Section B.6. Responsibilities – requests for space allocation and storage locations

Departments shall include a description of their records management plan with any request for additional space and relevant capital improvements, and in that description shall include any work with the CAO to most efficiently and cost effectively address the space demands of records in their current location. All storage and/or destruction services, other than the RRC, must be approved by the CAO. Any storage location that provides destruction services must follow proper destruction procedures and such procedures must be reviewed and approved by the CAO. The entity performing the destruction services must have the ability to issue certificates of destruction; certificates of destruction must be in the approved County format and are to be retained by the department with a copy to the RRC.

Section B.7. Responsibilities – records & micrographic equipment, software & systems

To ensure efficient and cost-effective use of existing resources and to meet established standards for responsible recordkeeping, the Contracts/Purchasing Officer, and/or his or her agents, shall ensure that departments requesting such resources consult with appropriate departments, , prior to the approval of the purchase, upgrading, or rental of records and/or micrographic equipment, software and systems. All Requests for Proposals (RFPs) issued by County departments must be reviewed and approved by the CAO.

Section B.8. Responsibilities – annual report

The RRC shall develop and maintain a multi-year business plan, in consultation with the CAO or designee, to make available archival, records and reformatting

services to all County departments. This plan shall include establishing fees adequate to recover the full costs of such services.

Within ninety days following the end of each fiscal year, RRC shall make an annual report to the Board of Supervisors summarizing the activities of the County's Records Management Program, and addressing conformance to generally accepted responsible recordkeeping standards. The annual report shall include a listing of all extensions to retention periods requested by and granted to departments through the course of the year, and brief summaries of the justifications given. The annual report shall also identify any departments not following the scheduled destruction protocols.

The annual report shall include a summary of the financial activities of the Program in the previous year compared with budgeted appropriations and estimated revenues. The annual report shall also include the Program's long-range financial plan over a period of not less than five years into the future. The annual report shall also include an executive summary of the Program's multi-year business plan prepared pursuant to Section B.1., including, but not limited to, an assessment of service needs and market opportunities, strategic planning, and capital planning.

Part C. Standards

Section C.1. Standards – establishing

With the approval of the County Administrative Officer and County Counsel, and other appropriate departments as determined by the CAO, the standards for responsible recordkeeping in conformity with applicable statutes, regulations and recognized best practices shall be established, and training, advice, and assistance shall be provided to all County departments in conforming to those standards.

Section C.2. Standards – establishing – records retention and destruction

The CAO shall develop standards, forms and procedures to assist departments in preparing departmental records retention schedules that adequately provide for the indefinite retention of records of permanent value, for the indexing and searching of those retained records, and for the prompt and orderly disposition of records of temporary value.

Section C.3. Standards – copy of record

Where any County record, as defined in this policy, is created or received and maintained in more than one copy, the department(s) concerned shall clearly designate an official copy of record, and shall assign responsibility for maintaining that copy of record in accordance with the applicable records retention schedule.

Section C.4. Standards – reformatting

To ensure cost-effective production of copies, whether analog or digital, of County records that meet required standards for surrogates, the CAO shall cause the management and operation of an official County reformatting program following generally accepted industry standards. Such standards shall include provisions related to access, indexing, searchability, readability and printer/reader capabilities.

The CAO shall cause a reference library to be maintained of such applicable state, national and international reformatting standards for the use of all County departments and other clients.

Reformatting of County records by any department, or by any outside contractor, shall meet or exceed the same standards applied by the County reformatting program. All departments performing their own reformatting or contracting for reformatting shall work with the CAO to establish appropriate procedures to confirm adherence to those standards.

All records reformatted pursuant to this Policy must be certified by the RRC, or a qualified third party, to have been reformatted to required standards. Additionally, the Department whose records are reformatted must execute an acknowledgement that the reformatted records are intended to serve as the official copy of the record in question and that such reformatted version shall be treated as the official copy. Such certification and acknowledgement shall be submitted to the RRC and the CAO at the time of reformatting.

Section C.5. Standards – microfilm

All film used in the microphotography process shall meet or exceed minimum standards of quality approved by the United States Bureau of Standards and the American National Standards Institute, or other generally recognized standard setting organizations as applicable and relevant. A true copy of the microfilm shall be kept in a safe and separate place for security purposes, along with appropriate equipment necessary to read and print the microfilmed material.

Section C.6. Standards – electronic format

In accordance with Government Code §12168 et seq., the Board of Supervisors recognizes the need to adopt uniform countywide standards for the purpose of storing and recording both permanent and temporary records in electronic media. In order to ensure that uniform countywide standards remain current and relevant, CAO, in consultation with the County Counsel, shall cause to be disseminated appropriate standards established by the American National Standards Institute, the Association for Information and Image Management, or other generally recognized standard setting organizations as applicable and relevant. These standards shall include a requirement that a trusted system be utilized.

In order to implement standards as expeditiously as possible, and until such time as specific countywide standards are adopted, IT shall make readily available to departments, copies of standards and/or guidelines recommended by the American National Standards Institute, the Association for Information and Image Management, or other generally recognized standard setting organizations, as applicable and relevant, for recording permanent and/or nonpermanent records. Departments shall ensure that microfilming, electronic data imaging, and photographic reproduction meet or exceed these minimum standards.

Part D. Records retention

Section D.1. Records retention schedules – Cross-departmental

In order to most efficiently and effectively implement the various provisions of the Government Code pertaining to Board of Supervisors approval of records retention and destruction, the County shall use board approved cross-departmental and departmental records retention schedules that specify various record series, their retention periods, and any particular restrictions or specifications regarding their retention, disposition and destruction. Cross-departmental records are those types records commonly used by many departments, including correspondence, invoices and standard agreements. The cross-departmental approved schedule shall apply to all departments.

Section D.2. Records retention schedules – responsibilities

RRC shall coordinate preparation of records retention schedules and records destruction activities generally, and shall act as liaison between departments, County Counsel and the County Administrative Office in matters dealing with records retention.

Departments shall submit proposed retention schedules for departmental records that fall outside the scope of the cross-departmental records identified in Section D-1. As an example, environmental impact reports, litigation files, and public assistance applications would each be included in a department specific schedule, and the retention period will be based on the legal requirements specifically applicable to those department-specific records. Such proposed retention schedules shall be submitted as a proposed appendix to the policy and shall be submitted for prior review by the CAO. This includes coordinating statutorily required Board approval of each departmental schedule, and periodic updates as necessary to remain current.

Section D.3. Records retention schedules – responsibilities – master file

RRC shall maintain a master file of all records retention schedules approved by the Board of Supervisors with a copy of the Board minute order of approval attached to each. RRC shall make readily available to County officials, employees, and the public reference copies of approved records retention schedules.

Section D.4. Records retention schedules – standard – copy of record

Records retention schedules shall apply to the official copy of the record, unless explicitly stated otherwise.

Section D.5. Records retention schedules – standard – retention periods

The retention periods on Board approved records retention schedules are mandatory, and records shall be destroyed in accordance with those approved retention periods, as provided for in Section D.9. Records not required for active or likely litigation, and which have been subjected to any and all applicable audits, must be destroyed at the end of their scheduled retention period, unless a department head certifies a specified business need to extend their retention period. RRC shall keep a register of such certified extensions, and report a summary of extensions in their annual report.

No duplicates or other copies of any record shall be retained longer than the mandatory retention period for the copy of record. When records are destroyed by schedule, departments shall ensure they retain no duplicates or other copies.

Section D.6. Records retention schedules – approval

Pursuant to Government Code §26205.1, to be in effect records retention schedules require approval by the Board of Supervisors. Records retention schedules submitted to the County Administrative Office for Board approval shall require prior sign off by the County Archives manager, Risk Management, County Auditor-Controller, County Counsel, and the RRC.

Section D.7. Records retention schedules – cross-departmental schedule

A cross-departmental records retention schedule for the County has been developed, in consultation with County departments as necessary and appropriate. The cross-departmental records retention schedule shall provide authority for the disposition of records commonly found in most County departments. The completed or updated proposed cross-departmental records retention schedule shall be accompanied by a signature page signed by the County Archives manager, Risk Management, County Auditor-Controller, County Counsel, and the director of the RRC, or their respective designees. The cross-departmental records retention schedule and its accompanying signature page shall be submitted to the County Administrative Office for review and submittal to the Board of Supervisors for approval. The cross-departmental records retention schedule shall not cover the specific programmatic records produced by departments. Retention requirements of programmatic records shall be defined and documented by departments in their own specific records retention schedules in consultation with the CAO. Pursuant to Government Code §26205.1, no general records retention schedule shall be effective unless and until approved by the Board of Supervisors. Upon approval of a cross-departmental schedule, no further action by the Board of Supervisors shall be required for record management performed in compliance with this Policy, including destruction.

Section D.8. Records retention schedules – departmental schedules

Specific records retention schedules shall be developed and maintained by each County department. The departmental schedule must conform to this policy and be in the format in the sample schedule attached in Exhibit A. CAO shall cause forms and procedures to be provided for inventorying records and developing departmental retention schedules, and shall provide guidance and assistance to department personnel in their use upon request. All proposed or updated departmental records retention schedules and their accompanying signature pages shall be submitted on behalf of departments to the CAO for review prior to submittal by the department to the Board of Supervisors for approval. All records departmental retention schedules submitted to the Board of Supervisors shall be accompanied by a signature page signed by the head of the department, Risk Management, County Auditor-Controller, County Counsel, the County Archives manager, and the director of the RRC, or their respective designees. A Board approved departmental records retention schedule shall provide authority for the disposition of records commonly found only in that County department. Pursuant to Government Code §26205.1, no departmental records retention schedule shall be effective unless or until approved by the Board of Supervisors. Unless otherwise provided on such schedule, upon approval of a departmental records retention schedule, no further action by the Board of Supervisors shall be required for management performed in compliance with this Policy, including destruction.

Records that are designated as privileged, confidential or sensitive shall be clearly designated as such when stored. This includes, but is not limited to probation, attorney-client privileged, medical, and trade secret records.

Section D.9. Records retention – records destruction

Pursuant to Government Code §§26201-26202.6 and §§26205-26205.8, County records, as defined in this policy, shall only be destroyed: (1) in accordance with an approved records retention schedule; or (2) after reformatting to required standards set forth in this policy and pursuant to procedures prepared by the CAO; or (3) with specific permission of the Board of Supervisors.

Reformatting means to copy the content, structure, and context of records to another medium in such a way the copy may act as a satisfactory surrogate for the original. In order to conserve space and resources, original records reformatted to required standards may be destroyed before their approved retention period has expired, since, from the time the originals are destroyed, the reformatted copies are deemed to be original records, and subject to the same requirements and restrictions of the retention schedules applicable to the originals.

Records shall be destroyed in accordance with standards and procedures developed by CAO. These procedures shall include a form approving the

destruction signed by the head of the department, or his/her designee and the County Counsel, or his/her designee, and, if destruction is the result of reformatting records, the RRC. In approving such destruction, the department shall certify that the records have been indexed and reviewed, that there is no litigation hold requiring continued retention of the records in question, and that destruction is allowed in compliance with this Policy. County Counsel review shall be limited to certifying that applicable procedures have been followed, and, if applicable, RRC review shall certify that reformatting has occurred in compliance with this Policy. Review of the authorization for destruction shall be given due priority by reviewing departments in order to facilitate the orderly management of records and reduce costs.

All approvals of the destruction of records shall include:

- (1) an index of all records to be destroyed; and
- (2) a citation to the specific records retention schedule and the specific item on that schedule providing authority for the destruction; and,
- (3) the departmental and County Counsel certifications described above; and
- (4) (if applicable) certification that the records were reformatted to required standards, and the reformatted copies are intended to serve as the copy of record; or
- (5) an attached copy of the board minute order authorizing destruction.

The completed approval form authorizing destruction shall be retained by the department, and a copy of the approval form shall be maintained by the RRC.

To establish a proper chain of custody, only certified document destruction services may be utilized by County departments. Any non-County service utilized must be pre-approved by the CAO as described in B.6 above.

Records required for audit purposes shall not be destroyed by authority of an approved schedule until all applicable audits are complete and audit exceptions resolved.

All approvals of the destruction of records shall include certification by the head of the department, or their designee, that, after conferring with Risk Management and County Counsel, the records are not required in relation to active or likely litigation or for audit purposes.

A representative of RRC or the department shall supervise the destruction of records, and shall attest in writing that destruction is carried out according to required procedures. The department carrying out the destruction shall retain the attestation. A copy of this attestation shall also be provided to RRC for tracking purposes.

Section D.10. Records retention – records subject to litigation holds

Records required in relation to active or likely litigation shall be maintained, and may not be destroyed by authority of an approved schedule, until all applicable litigation matters are finally resolved and both Risk Management and County Counsel approve disposition.

Section D.11. Records retention – non-records destruction

Pursuant to Government Code §26201 *et seq.*, the Secretary of State Guidelines, and other provisions of the state statutes, non-records, as defined in this policy, may be destroyed at any time. Departments may destroy non-records when they are no longer needed to support business processes, and should be destroyed promptly upon finalization of the related record or decision. For example, drafts of staff reports should be destroyed upon finalization of the report that goes to the approving body.

Section D.12.E-mail Policy

It is the County’s policy that County e-mail and e-mail systems are intended to be a medium of communication. County e-mail systems are not intended to be and may not be used for electronic storage or maintenance of County records. The e-mail system, to function as intended, anticipates or requires that employees regularly delete communications from the system.

E-mail messages and attachments comparable to hard copy documents that would be retained under this policy should be retained as follows: The document must be categorized in the appropriate record series and converted to the appropriate electronic format or printed in hard copy and retained for the required time period as outlined in the applicable records retention schedule. Regardless of the form in which the record is retained, proper procedures as outlined in this Policy must be followed prior to the destruction of any record.

Routine e-mail messages are comparable to telephonic communications and are non-records. They are not intended to be retained in the ordinary course of County business, and the informational content of such communications is neither necessary nor intended to be preserved for future County use or reference. Each user will have the responsibility to remove such non-records from folders within the County’s electronic mail system on a regular basis. This includes items in “received” and “sent” folders as well as any folders set up by individual users. Upon removal from the system, the non-records will be destroyed in the County’s ordinary course of business. An e-mail is considered destroyed as soon as it has been deleted from a user’s mailbox, even though it may be temporarily stored in the trash folder before being purged from the e-mail system.

Each e-mail user will be trained in the application and implementation of this policy. The CAO shall cause appropriate procedures and training materials to be

developed within nine (9) months of the adoption of this policy and shall update as appropriate.

This policy does not prohibit employees from maintaining temporary working files or folders to allow for quick reference to recent e-mails.

Part E. Transitions and Training

In recognition that the adoption of this Policy requires the transitioning of older procedures and the development of new forms and processes, the following periods and goals are incorporated.

Section E.1. Records retention schedules

All Departments are to present their departmental schedules to the Board for consideration as quickly as reasonably feasible, but no later than May 31, 2015.

Section E.2. Development of Forms and Procedures

The CAO is directed to develop appropriate forms and procedures to allow for the Departments to comply effectively and efficiently with the concepts and directions provided for in this Policy. The CAO is directed to exercise the authority granted in this Policy to develop at least the following procedures and related documentation:

- a. Forms and instructions for the intake of records into the Records Retention Center;
- b. Forms and instructions for authorizing and documenting the destruction of records;
- c. No more than three naming and searching conventions to promote the standardization of filing and searching for records;
- d. Development of an intranet-based system for training, appropriate authorizations, and other appropriate uses.

The development of procedures, documents and training shall be the primary focus of the CAO for the first nine months of this Policy.

Section E.3. Training

All Departments shall cooperate in the provision of adequate training on the policy and procedures described herein and developed by the CAO.