

DES, CUSTOMER SERVICE OFFICE

RECORDS RETENTION POLICY

Introduction

The Department of Environmental Services (DES), Customer Service Office (CSO) has devised this Records Retention Policy in conformance with the Library of Virginia's Records Retention and Disposition Schedule, General Schedule No. 7, Public Utilities Records County and Municipal Governments Public Utility Departments (Library of Virginia's Guidance). The Library of Virginia's Guidance governs the creation, retention and destruction of all business records maintained by the CSO or on the CSO's behalf.

Purpose

CSO creates and maintains records in paper and electronic formats, to meet its business needs and to comply with legal and regulatory requirements (Business Records). The purpose of this policy, is to:

- Ensure the proper retention of records and other information needed for the efficient transaction of CSO business,
- Comply with applicable laws and regulations,
- Provide a method of identifying and maintaining records that would otherwise be subject to destruction but that are needed for a priority business need, such as audits, investigations and litigation proceedings; and
- Provide for the destruction of records that do not need to be maintained under the Library of Virginia's Guidance, in an effort to reduce record storage costs, clutter and to generally improve availability and accessibility of relevant records when needed.

Scope

This policy applies to all CSO Business Records, whether they are kept in paper, electronic or other media formats. This Records Retention Policy requires that all CSO personnel adhere to the provisions of this policy when creating, storing, retrieving, managing or disposing of CSO Business Records.

Policy

CSO personnel will manage the retention, storage and destruction of its Business Records for the minimum retention period contained in the Record Retention Schedule (Schedule) below, or for as long as they are needed for business or legal purposes. Business Records should be timely destroyed after the expiration of the applicable retention period, also contained in the Schedule below.

DES - Customer Service Office*2018 - Record Retention Schedule**

	<i>Record Type</i>	<i>Destroy After</i>	<i>From</i>
1	Meter Readings (<i>including photos</i>)	3 years	Billing cycle or until audited
2	Utility Billing Documents	3 years	Billing cycle, payment/refund date or until audited
3	Applications for Utility Service (<i>New account or name change</i>)	3 years	After utility service is terminated
4	Customer Correspondence & Complaint Files	3 years	After resolution/ denial
5	Cut-offs	3 years	After termination
6	Active Meter Service/Repair/Consumption Data	Life of meter	Installation

Schedule Application

The Schedule shows “*Record Type*” categories and retention, or “*Destroy After*”, periods for documents that the CSO regularly prepares and receives in the ordinary course of its business. Not every type of record is identified in the Schedule. If a document cannot be easily defined using the record categories above, good professional judgement should be used by CSO Personnel to identify which of the record types and retention standards should be applied. A tabulation of most of our record types, as of the date of this writing may be found as an attachment. If after due consideration, personnel remain unable to identify which record type and retention standard to apply to an uncommon document, then the document should be kept for the longest retention period allowable. Where multiple record categories may apply to the same document, the category with the longest retention period should be chosen.

This Schedule does not apply to documents that are or could foreseeably and reasonably be required in relation to a lawsuit, investigation, audit or FOIA request. The retention period for any such document shall only begin after the ultimate resolution of the related matter is responded to or resolved, whichever the case may be.

If the application of this guidance is impractical or unreasonable, the CSO Customer Service manager or their designee may waive this requirement and apply a different retention standard record types contained in the Schedule above.

If any ambiguity exists about the time after which a Business Record should be destroyed, then the destroy-after record retention periods will start on the day that they are received or sent by mail completed, finalized, or otherwise made inactive by a payment event or other action.

Document Storage

CSO personnel will take all reasonable measures to ensure the integrity, confidentiality and availability of the Business Records that they create or retain. Most records should be retained in shared (*physical or electronic*) work areas for all of their retention period. Physical documents should be reviewed annually to determine whether they are within their retention period or if they should be destroyed

Electronic record storage is a low cost and accessible alternative to physical media and it is the preferred medium for the maintenance of CSO records.

When multiple copies of a document exist one media version (*preferably an electronic format*) should be designated as the copy of record and the remainder considered as convenience copies that are eligible for destruction whenever practical. *For example, when paper documents have been scanned and validated, the scanned version should be retained as the copy of record and the paper copy should be destroyed as soon as its value as reference material is fulfilled.* This should apply to all duplicate records that are no longer needed for a valid business reason, including copies that are maintained by CSO personnel in their designated work space or on their work computers.

When electronic or scanned versions of documents exist and the integrity and quality of those documents is assured, there is no general requirement to retain a paper copy.

Draft versions of documents should not be retained after they are superseded by later drafts or final documents unless they are being retained as templates or for another business or legal reason.

For essential records a duplicate of a copy of record document should be maintained separately to ensure recoverability in the event of the loss of the copy of record. Security, location and format should be taken into consideration when considering how best to maintain a duplicate of a copy of record.

Electronic files should be kept in a simple, ubiquitous and searchable file format (*like MS Word, Excel and pdf*) in a shared folder (*such as on the L: Drive*) or other accessible location (*for example on OnBase, or within the Utility Billing System*). Scanned documents must be tagged and indexed to include data such as: account, location, date, contents and originator. This can all be achieved through the application of a simple naming regimen (*ex. YEAR.MONTH.DAY.SUBJECT.ORIGINATORS INITIALS*). It is preferable for scanned documents to be processed for automatic character recognition to support full text support. Non-permanent records, such as electronic office documents, spreadsheets, databases and email messages may be retained in their original record format, or in another format that can be readily accessed using the original applications and/or other pervasive and well-supported access tools.

Document Destruction

Physical documents are to be destroyed using normal recycling procedures. Sensitive documents must be disposed of in such a manner, like shredding, as to ensure confidentiality or security.

Public Records are to be destroyed properly and in accordance with the Virginia Public Records Act. Destruction of Public Records must be reported to the State using the Certificate of Records Destruction Form RM-3. This requirement does not apply to reference materials, personal items and copies. Additional information about our reporting obligations may be found on the County's Records & Information Management page, at:

<https://arlingtonva.sharepoint.com/tech/Pages/About%20DTS/Records-And-Information-Management.aspx>

Open Data & Applicable Laws

CSO documents are for the most part subject to the provisions of the Virginia Freedom of Information Act, as amended. For this reason, there should be no expectation of privacy with respect to information transmitted over, received by, or stored in any electronic communications device owned, leased or operated in whole or in part by or on behalf of the CSO.

Documents may be retained indefinitely if, because of their age or objective value, may be of historical interest or significance. Documents of this nature require supervisory approval before they can be designated as historical or otherwise too valuable to destroy.

It is the responsibility of all CSO personnel to ensure that the standards of this policy are uniformly applied. Willful or negligent violations of this policy will be treated with all due seriousness. Supervisors are responsible for ensuring that they, their staff and contractors understand and apply this Policy.

This Policy and the Schedule that it contained will be regularly reviewed to comply with changing business needs or to any relevant changes to applicable laws and regulations. Any changes to this Policy must be approved by the CSO Customer Service Manager before they can be incorporated into this Policy.

DES - Customer Service Office

2018 - Record Retention Schedule

Record Type	Destroy After	From Date
Meter Readings	3 Years	Billing Cycle or Audit
Photos of Meter Reads Cycle Reads Special Reads Re-Reads Final Reads Initial Reads Correct Last Read Can't Locate Meter Itron Mobile Misses Hi-Use Investigation Iton Investigation No-Locate Estimated reads		
Utility Billing Documents	3 Years	Billing Cycle, Payment/Refund date or audit
Billing File Payment Plans Agreements Returned Checks Refunds Payments Received by USO-Treasury compliant Change of Address File NCOA Tenant Request Letters Backdoor Application		
Applications for Utility Service	3 Years	After Utility Service is terminated

New Permit Applications New Service Request New Tenant Name Change Demo Request		
Customer Correspondence & Complaint File	3 Years	After Resolution/ Denial
Letters Copies of emails Signed Copy of Payment Plan Leak Adjustment Requests Copies of Leak Adjustment Resolution Notes with Remittance Returned Mail		
Cut-Offs	3 Years	After Termination
List for the field Turn-Off for non-payment Check Meter after Turn-Off Turn-On After payment Liens		
Active Meter	Life of Meter	Installation
Service/Repair/Consumption Data Place Meter Vault and meter inspection Itron investigation Adj Box to Ground Broken Meter Box Running Backwards Foggy/Frozen Meter Meter Fenced Off Covered unreadable Non-Regist Meter Box Full of Water Gas in Box Install/Replace Itron Ert Turn Off For Repairs Remove Meter Leak In the Box		