ALBANY COUNTY FIRE DISTRICT #1

Records Retention Policy

Companion Document

This Records Retention Policy implements Statement 5.2 of the District's Data Privacy Policy and governs the retention and disposition of all public records, including personal data, maintained by Albany County Fire District #1 ("District"), regardless of physical, digital, or electronic form. It is intended to be read together with, and does not limit, the Data Privacy Policy and the District's Public Records Policy.

Section 1 — Purpose

This policy establishes the District's framework for the retention, storage, and lawful disposition of its public records. It is adopted to: (a) satisfy the written-policy requirement of W.S. § 9-21-203(c) for any personal data the District retains beyond the three-year statutory default period; (b) ensure the District's records are preserved for the periods required by Wyoming law and disposed of only in accordance with that law; and (c) provide District personnel with clear, consistent procedures for applying the applicable retention schedule.

Section 2 — Legal Authority

This policy is adopted under, and shall be interpreted consistently with, the following authorities:

(a) W.S. § 9-2-401(a)(v), defining "public record" for purposes of the Records Management Act;

(b) W.S. § 9-2-405 through § 9-2-413, governing the classification, management, retention, and disposition of public records of political subdivisions, including special districts;

(c) W.S. § 9-2-410, providing that all public records are the property of the state and may be preserved, stored, transferred, destroyed, or disposed of only in accordance with W.S. § 9-2-405 through § 9-2-413;

(d) W.S. § 9-2-411, establishing the State Records Committee's authority over the retention and disposition of public records, and the Wyoming State Archives Local Government Records Retention Schedules issued under that authority;

(e) the Wyoming Public Records Act, W.S. § 16-4-201 through § 16-4-205, governing public access to records; and

(f) W.S. § 9-21-201 through § 9-21-203 (the Data Privacy in Government Entities Act) and the District's Data Privacy Policy, Statement 5.2, which requires a written policy for personal data retained longer than three (3) years and recognizes statutory retention schedules as reasonable justification for that extended retention.

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Section 3 — Scope

This policy applies to all public records created, received, or maintained by the District in the conduct of public business, in any format, including but not limited to paper, electronic, digital, imaged, audio, video, or other physical or digital medium, and to all District Board members, officers, employees, volunteers, contractors, and any other personnel who create, receive, or maintain District records. It applies to every District function, including administration and governance, finance and accounting, personnel, apparatus and equipment, training, fire prevention and investigation, and emergency response and patient care records.

Section 4 — Definitions

Public Record

Has the meaning given in W.S. § 9-2-401(a)(v): the original and all copies of any paper, correspondence, form, book, photograph, photostat, film, microfilm, scan, sound recording, map, drawing, or other document, regardless of physical, digital, or electronic form, made or received in transacting public business by the District.

Record Series

A group of records that are related as a unit because they result from the same activity, relate to a particular subject, or have a particular physical form, and that are customarily retained, used, and disposed of as a unit.

Retention Period

The minimum length of time a record series must be kept before it is eligible for disposition, as established by the applicable Wyoming State Archives retention schedule or, where no state schedule applies, by this policy.

Disposition

The final action taken with respect to a record series once its retention period has expired: destruction, or transfer to the Wyoming State Archives for records of permanent or historical value.

Permanent Record

A record series designated by the applicable retention schedule as having continuing legal, fiscal, administrative, or historical value and that is never destroyed, but is retained by the District or transferred to the Wyoming State Archives.

Vital Record

A record essential to the continued operation of the District, to the protection of the legal and financial rights of the District and the residents it serves, or to the resumption of operations after a disaster; for example, governing documents, insurance policies, and current apparatus and infrastructure records.

Litigation Hold

A directive suspending the disposition of specific records that are, or reasonably may become, relevant to pending or reasonably anticipated litigation, audit, or investigation, regardless of an otherwise applicable retention period.

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Records Officer

The District staff member designated under Section 6 of this policy to administer the District's records retention program.

Section 5 — Adoption of the Wyoming State Archives Retention Schedule

5.1. The District adopts, and incorporates by reference into this policy, the retention periods and disposition instructions set forth in the Wyoming State Archives Local Government Records Retention Schedule applicable to special protection fire Districts, as published in the Local Government Records Retention Schedule Crosswalk maintained by the Wyoming State Archives Records Management Program, and as that schedule may be amended by the State Records Committee from time to time.

5.2. For every record series maintained by the District that is addressed by the adopted state schedule, the retention period stated in that schedule is the District's official, minimum retention period for that series. Personnel shall not dispose of a record series before the end of its scheduled retention period.

5.3. The current, controlling text of the adopted schedule is maintained on file with the Records Officer and attached to this policy as Exhibit A, which shall be updated whenever the Wyoming State Archives revises the schedule as applicable to the District. Exhibit A, and not any summary elsewhere in this policy, governs in the event of any inconsistency.

5.4. Statutory retention periods established in W.S. § 9-2-405 through § 9-2-413, as reflected in the adopted schedule, constitute automatic reasonable justification for retaining personal data beyond the three-year default period established by W.S. § 9-21-203(c), satisfying Statement 5.2 of the District's Data Privacy Policy for the record series they cover.

5.5. The District may retain a record series for longer than its scheduled minimum retention period where retention is reasonably necessary for an active administrative, legal, fiscal, or operational purpose, provided the extended retention and its purpose are documented by the Records Officer.

Records Not Covered by the State Schedule

Where the District maintains a category of personal data that is not addressed by the adopted state schedule and that the District wishes to hold beyond three years, Statement 5.2 of the Data Privacy Policy requires a written, entity-specific justification for that extended period. The Records Officer shall document any such record series and its justification in the data inventory maintained under Section 8 of this policy and shall present it to the Board for approval as an addition to Exhibit A.

Section 6 — Roles and Responsibilities

Records Officer (designated by the District Chair)

Administers this policy day to day. Maintains the current adopted schedule as Exhibit A and updates it upon amendment by the State Records Committee. Maintains the data inventory required by Section 8. Coordinates and documents the disposition of records under Section 9. Serves as the District's point of contact with the Wyoming State Archives Records Management Program. Maintains litigation hold notices under Section 10. Unless otherwise designated, the District Chair shall also serve as the Records Officer.

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Section 7 — Record Categories Maintained by the District

The categories below are the general classes of records the Wyoming State Archives Local Government Records Retention Schedule for special Fire Districts. The specific record series, exact retention periods, and disposition instructions for each category are as set forth in Exhibit A, not in this section, because those periods are set and periodically revised by the State Records Committee. This section is a navigational summary only.

Governance and Administration
Board bylaws, resolutions, ordinances, meeting agendas and minutes, policies, correspondence, and annual reports.

Financial and Budget Records
Budgets, levies and mill certifications, general ledgers, accounts payable and receivable, audit reports, bank records, purchasing and contract records, and grant records.

Personnel Records
Employment applications, personnel files, payroll and timekeeping records, benefits records, workers' compensation records, and volunteer rosters and certifications.

Apparatus, Equipment, and Facilities Records
Apparatus maintenance and inspection logs, fuel and mileage records, equipment testing and certification records (including NFPA-required testing), and facility maintenance records.

Training Records
Individual and department training records, certifications, and continuing education documentation.

Incident, Response, and Patient Care Records
Incident and run reports, fire investigation reports, NFIRS submissions, and EMS patient care records. EMS patient care records also constitute protected health information and are subject to the HIPAA safe harbor addressed in Statement 4.3 of the Data Privacy Policy.

Fire Prevention and Inspection Records
Inspection reports, permits, plan reviews, and code enforcement records.

Legal and Risk Management Records
Contracts and agreements, insurance policies and claims, litigation and claims files, and tort claim notices.

Communications and Public Information Records
Dispatch logs and recordings, public records requests, and public information releases.

Section 8 — Records and Data Inventory

8.1. The Records Officer shall maintain a current inventory of the personal data collections and record series the District holds, identifying for each: the category of data or records, the system or location where it is stored, the purpose for which it is collected or maintained, the applicable retention period (by reference

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to Exhibit A or, where applicable, a District-specific period approved under Statement 5.5), and the responsible department.

8.2. The inventory need not be a formal document; a working spreadsheet or log is sufficient. It shall be updated whenever the District adds a new record series or personal data collection, materially changes an existing one, or discontinues one.

8.3. The inventory supports the District's ability to respond to personal data access requests under Section 7 of the Data Privacy Policy, to apply the correct retention period, and to identify affected systems in the event of a security incident.

Section 9 — Disposition Procedures

9.1. A record series may be disposed of only after its retention period, as stated in Exhibit A, has expired, and only after the Records Officer has confirmed that no litigation hold under Section 10 applies to the records.

9.2. Before any records are destroyed, the Records Officer shall document the disposition, including a description and quantity of the records disposed of, the manner of destruction, the dates covered, and the date of destruction. This documentation shall itself be retained as a permanent record.

9.3. Records designated as permanent under Exhibit A shall never be destroyed. Where the District wishes to destroy the paper originals of permanent records that have been scanned or otherwise reproduced, the District shall first obtain approval of the reproduction process and of the destruction from the State Records Committee through the Wyoming State Archives, consistent with W.S. § 9-2-413.

9.4. Records containing personal data or other confidential or sensitive information shall be destroyed by a method that renders the information unreadable and non-reconstructable — for example, shredding of paper records and secure wiping or destruction of electronic media — and shall be destroyed under the supervision of personnel designated by the Records Officer to ensure no such records fall into unauthorized hands.

9.5. The District may retain any record series beyond its scheduled minimum retention period, consistent with Statement 5.5.

Section 10 — Litigation Hold and Suspension of Disposition

10.1. Upon notice of pending or reasonably anticipated litigation, audit, or investigation, the Records Officer, in consultation with legal counsel, shall issue a written litigation hold identifying the records affected and directing that their disposition be suspended, notwithstanding any retention period that has otherwise expired.

10.2. Personnel who receive a litigation hold notice shall preserve the identified records in their current form and shall not delete, alter, or destroy them until the hold is released in writing by the Records Officer.

10.3. The Records Officer shall maintain a log of all litigation holds issued and released.

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Section 11 — Electronic Records and Format Neutrality

Retention requirements under this policy apply regardless of the physical, digital, or electronic form of a record. A record series maintained in electronic form is subject to the same retention period as its paper counterpart. Electronic records systems used to store records subject to a permanent or long-term retention period shall be selected and maintained with regard to the long-term accessibility and integrity of the records they contain, and the District shall consult the Wyoming Digital Archives program where long-term electronic preservation of permanent records is at issue.

Section 12 — Review and Amendment

12.1. This policy, and the currency of Exhibit A, shall be reviewed at least annually by the Records Officer, and whenever there are known revisions by the Wyoming State Archives to the schedule.

Section 13 — Training

The Records Officer shall ensure that personnel with responsibility for creating, maintaining, or disposing of District records receive orientation on this policy, including how to locate the applicable retention period in Exhibit A, how to request a disposition, and how to recognize and respond to a litigation hold.

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Exhibit A — Adopted Retention Schedule

Special Districts
Adminstration

Archival Review by Agency

Administration and Business Support (ADM)					
General Management (GMT)					
Correspondence - General	ADM-GMT-05	CR	3	Retain 3 years after create date, then destroy	Yes
Superseded Schedules					
10-047 Correspondence and Memoranda					
Transitory Records	ADM-GMT-26	OBS/SUP	3	Retain 3 years after obsolete or superseded, then destroy.	No
Superseded Schedules					
10-045 Administrative Records					
Financial and Accounting (FIN)					
Accounting Management (ACC)					
Reports - Accounting	FIN-ACC-10	FYE	5	Retain 5 years after the fiscal year end then destroy	No
Superseded Schedules					
10-048 Financial Records					
Governance and Compliance (GAC)					
Audit, Oversight and Compliance (AOC)					
Maps	GAC-AOC-11	OBS	3	Retain for 3 years after obsolete,then destroy	Yes
Superseded Schedules					
10-049 Maps, Plans, Specifications, Engineering Drawings, Plats and Survey notes					
Governance (GOV)					
Minutes, Resolutions, and Ordinances	GAC-GOV-03	PERM		Retain permanently	No
Superseded Schedules					
10-050 Minutes					
Legal and Judiciary (LGL)					
Contract Management (CTR)					
General	LGL-CTR-04	EXP	10	Retain 10 years after expiration then destroy	No
Superseded Schedules					
10-046 Contracts and Agreements					