

**KREMMLING SANITATION DISTRICT**

**RESOLUTION 2026-01-02**

**RESOLUTION ADOPTING POLICY**

**WHEREAS**, the Kremmling Sanitation District (the “District”) is a quasi-municipal corporation and political subdivision of the State of Colorado, located in the County of Grand, Colorado, and is a duly organized and existing special district pursuant to C.R.S. § 32-1-101 *et seq.*

**WHEREAS**, the Board of Directors (the “Board”) has the management, control, and supervision of all the business and affairs of the District, pursuant to C.R.S. § 32-1-1001(1)(h).

**WHEREAS**, the Board may appoint, hire, and retain agents, employees, engineers, and attorneys pursuant to C.R.S. § 32-1-100(1)(j).

**WHEREAS**, the Board may appoint, exercise all rights and powers necessary or incidental to or implied from the specific powers granted to special districts pursuant to C.R.S. § 32-1-100(1)(n).

**WHEREAS**, the District desires to clarify its general operating policies and consolidate the same into easy-to-understand policy documents.

**WHEREAS**, on January 1, 2026, new legislation took effect that impacts the operations of the District and creates requirements and obligations.

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Directors of the Kremmling Sanitation District as follows:

1. Records Retention. Exhibit A, attached hereto and incorporated by this reference, is adopted as the District’s Policy on Records Retention.
2. Equal Opportunity and Nondiscrimination. Exhibit B, attached hereto and incorporated by this reference, is adopted as the District’s Policy on Equal Opportunity and Nondiscrimination.
3. Whistleblower Protection. Exhibit C, attached hereto and incorporated by this reference, is adopted as the District’s Policy on Whistleblower Protection.
4. Digital Accessibility. Exhibit D, attached hereto and incorporated by this reference, is adopted as the District’s Policy on Digital Accessibility.
5. Electronic Signatures. Exhibit E, attached hereto and incorporated by this reference, is adopted as the District’s Policy on Electronic Signatures.

6. Repeal of Inconsistent Policy. Any prior policy that is inconsistent herewith is repealed on the effective date of this resolution.
7. Severability. If any part, section, subsection, sentence, clause or phrase of this Resolution is for any reason held to be invalid, such invalidity shall not affect the validity of the remaining provisions.
8. Effective Date. This Resolution shall take effect immediately upon adoption.

ADOPTED by the Board this 12th day of January 2026.

**KREMMLING SANITATION DISTRICT**

By: *Noble Underbrink*  
Noble Underbrink (Jan 13, 2026 13:52:57 MST)  
\_\_\_\_\_  
Noble Underbrink  
President

ATTEST:

*Alan N. Hassler*  
Alan N. Hassler (Jan 26, 2026 19:36:22 MST)  
\_\_\_\_\_  
Alan N. Hassler  
Secretary

**Exhibit A**  
**Policy on Records Retention**

# KREMMLING SANITATION DISTRICT

## Policy on Record Retention

Adopted: January 12, 2026

1. Purpose. The purpose of this Policy on Records Retention (the “Policy”) is to ensure the lawful creation, maintenance, retention, and disposition of Kremmling Sanitation District (the “District”) records, formally adopt the Colorado State Archives-approved records retention schedule for special districts, and establish electronic records as the District's official record format.
2. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with, the:
  - a. Colorado Special District Act, C.R.S. § 32-1-101 *et seq.*
  - b. Colorado Open Records Act (“CORA”), C.R.S. § 24-72-201 *et seq.*
  - c. State Archives and Public Records Law, C.R.S. § 24-80-101 *et seq.*
3. Definitions.
  - a. “Public Records” shall have the meaning set forth in C.R.S. § 24-72-202(6) and include all writings, recordings, electronic data, and other documentary materials made, maintained, or kept by the District for use in the exercise of public functions.
4. Records Retention Schedule. The District hereby adopts and incorporates by reference the Colorado State Archives – Records Retention Schedule for Special Districts, as approved by the Colorado State Archives pursuant to C.R.S. § 24-80-105. This adopted schedule shall govern minimum retention periods of Public Records, archival preservation requirements, and authorized destruction of District records. The schedule, including all future amendments approved by the Colorado State Archives, shall be followed unless a longer retention period is required by law, litigation hold, audit, or Board action.
5. Electronic Records. Effective January 1, 2026, all Public Records created, received, or maintained on or after that date shall be created and retained electronically and maintained in an electronic records management system approved by the District Manager. Electronic records shall constitute the official record copy of the District.
6. Custodian of Records. The District Manager shall serve as the official custodian for the maintenance, care, and keeping of all public records of the District, in accordance with C.R.S. § 24-72-202.

Kremmling Sanitation District  
Policy on Retention of Records

7. Records Management Standards. Public Records shall be maintained in a manner that ensures accuracy and integrity, accessibility for the full retention period, and compliance with public inspection requirements of CORA. The District shall implement reasonable administrative, technical, and physical safeguards to protect records from loss, unauthorized access, or destruction, consistent with C.R.S. § 24-80-107.
8. Records Destruction. No Public Record shall be destroyed unless:
  - a. The minimum retention period under the adopted schedule has expired.
  - b. The record is not subject to a litigation hold, audit, or CORA request.
  - c. Destruction is authorized under C.R.S. § 24-80-106.
9. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
10. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.

**Exhibit B**  
**Policy on Equal Opportunity and Nondiscrimination**

# KREMMLING SANITATION DISTRICT

## Policy on Equal Opportunity and Nondiscrimination

Adopted: January 12, 2026

1. Purpose. This Policy on Equal Opportunity and Nondiscrimination (the “Policy”) establishes the Kremmling Sanitation District’s (the “District”) commitment to equal opportunity and non-discrimination in all District operations, including governance, employment, programs, services, public access, contracting, and interactions with the public. This policy is intended to ensure compliance with applicable Colorado and federal civil rights laws governing local governments and special districts.
2. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with the:
  - a. Colorado Anti-Discrimination Act (“CADA”), C.R.S. §§ 24-34-301 *et seq.*
  - b. Employment discrimination and retaliation provisions, C.R.S. §§ 24-34-401.
  - c. Protections for Public Workers Act, C.R.S. § 29-33-101 *et seq.*
  - d. Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.* (programs and services).
  - e. Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* (employment).
  - f. Americans with Disabilities Act (“ADA”), 42 U.S.C. § 12101 *et seq.*
  - g. Section 504 of the Rehabilitation Act, 29 U.S.C. § 794.
  - h. Age Discrimination Act of 1975, 42 U.S.C. § 6101 *et seq.*
3. Discrimination Prohibited. The District prohibits discrimination, harassment, and retaliation in any District activity or function. Equal opportunity shall be provided to all persons in access to District services, programs, facilities, employment, contracting, and decision-making. No person shall be excluded from participation in, denied the benefits of, or subjected to discrimination by the District on the basis of any protected characteristic under applicable law.

Kremmling Sanitation District  
Policy on Equal Opportunity and Nondiscrimination

4. Protected Characteristics. The District prohibits discrimination or harassment based on disability, race, creed, color, sex, sexual orientation, gender identity or expression, marital status, national origin, age, and religion.
5. Scope of Application. This Policy applies to all District functions, including but not limited to:
  - a. Governance and Board actions.
  - b. Employment and personnel matters.
  - c. Delivery of programs and services.
  - d. Access to District facilities and infrastructure.
  - e. Contracting, procurement, and vendor relations.
  - f. Public participation, communications, and customer interactions.
6. Reasonable Accommodation and Accessibility. The District shall provide reasonable accommodations and ensure accessible programs, services, and facilities as required by ADA Title II, 42 U.S.C. § 12131 *et seq.*, and Section 504 of the Rehabilitation Act, 29 U.S.C. § 794. Requests for accommodation or accessibility modifications shall be submitted to and evaluated by the District Manager.
7. Harassment and Retaliation. Harassment or retaliation against any individual for opposing discrimination, requesting accommodation, filing a complaint, or participating in an investigation is strictly prohibited and constitutes a violation of C.R.S. § 24-34-402.5 and applicable federal law.
8. Complaints and Investigation. This Policy shall be enforced by the District Manager, who is responsible for overseeing training, implementation, and resolution of concerns. Violations may result in disciplinary action, legal liability, or referral to the appropriate enforcement agencies.
  - a. Complaint Submission. Complaints shall be submitted in writing to the District by mail, email, or by using a designated form provided by the District. The complaint should include a detailed description of the incident(s), the parties involved, the date(s), and any supporting evidence. Anonymous complaints will be reviewed to the extent possible, but may limit the District's ability to fully investigate.

Kremmling Sanitation District  
Policy on Equal Opportunity and Nondiscrimination

- b. Investigation Procedure. Upon receipt of a complaint, the District Manager shall promptly acknowledge receipt and initiate a confidential investigation. The investigation will be conducted fairly and impartially, with an opportunity for all parties to provide information and evidence. The District shall, at the earliest possible opportunity, confer with its legal counsel to determine if a third-party investigator is necessary.
  - c. Resolution and Action. The District Manager shall issue a written determination summarizing findings and any actions taken, and notify the complainant and respondent, where appropriate. If a violation of this Policy is substantiated, corrective or disciplinary measures may be taken, including mediation, training, suspension of privileges, or referral to legal authorities.
9. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
10. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.

**Exhibit C**  
**Policy on Whistleblower Protection**

# KREMMLING SANITATION DISTRICT

## Policy on Whistleblower Protection

Adopted: January 12, 2026

1. Purpose. This Whistleblower Policy (the “Policy”) is adopted to encourage the reporting of Improper Governmental Actions of the Kremmling Sanitation District (the “District”) without fear of retaliation, ensure compliance with applicable Colorado and federal law, and establish clear reporting, investigation, and non-retaliation standards consistent with industry best practices.
2. Definitions.
  - a. “Improper Governmental Action” has the same meaning as C.R.S. § 24-50.5-102(2) and includes actions by the District or any of its officers, employees, contractors or agents that violate state or federal law, constitute mismanagement, abuse of authority, or gross waste of public funds, or pose a substantial and specific danger to public health or safety.
  - b. “Good Faith Report” means a report made with a reasonable belief that the information disclosed evidences an improper governmental action.
3. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with the:
  - a. Local Government Whistleblower Protection, C.R.S. § 24-50.5-101 *et seq.*
  - b. Prohibited personnel practices/retaliation, C.R.S. § 24-50.5-103.
  - c. Colorado Open Records Act (“CORA”), C.R.S. §§ 24-72-201 *et seq.*
  - d. Colorado Criminal Code (where criminal conduct is alleged) C.R.S. Title 18.
  - e. Federal whistleblower protections, as applicable, including 41 U.S.C. § 4712
4. Retaliation Prohibited. The District prohibits retaliation against any employee, officer, contractor, or agent who, in Good Faith, reports an Improper Governmental Action or participates in an investigation related to such a report. Reports may be made without fear of adverse employment action, discipline, harassment, or discrimination, consistent with C.R.S. § 24-50.5-103.
5. Reporting Procedures. Reports may be made to the District Manager, Board President, District’s legal counsel, or appropriate external authority, including law

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Policy on Whistleblower Protection

enforcement or regulatory agencies, as permitted by C.R.S. § 24-50.5-103. Reports may be oral or written and should include sufficient detail to allow for evaluation and investigation. Anonymous reports will be accepted to the extent practicable.

6. Complaints and Investigation. This Policy shall be enforced by the District Manager, who is responsible for overseeing training, implementation, and resolution of concerns. Violations may result in disciplinary action, legal liability, or referral to the appropriate enforcement agencies.
  - a. Complaint Submission. Complaints shall be submitted in writing to the District by mail, email, or by using a designated form provided by the District. The complaint should include a detailed description of the incident(s), the parties involved, the date(s), and any supporting evidence. Anonymous complaints will be reviewed to the extent possible, but may limit the District's ability to fully investigate.
  - b. Investigation Procedure. Upon receipt of a complaint, the District Manager shall promptly acknowledge receipt and initiate a confidential investigation. The investigation will be conducted fairly and impartially, with an opportunity for all parties to provide information and evidence. The District shall, at the earliest possible opportunity, confer with its legal counsel to determine if a third-party investigator is necessary.
  - c. Resolution and Action. The District Manager shall issue a written determination summarizing findings and any actions taken, and notify the complainant and respondent, where appropriate. If a violation of this Policy is substantiated, corrective or disciplinary measures may be taken, including mediation, training, suspension of privileges, or referral to legal authorities.
7. Non-retaliation. Retaliation against an individual for making a good faith report or participating in an investigation is strictly prohibited and constitutes a violation of C.R.S. § 24-50.5-103. Individuals who believe they have been subjected to retaliation may pursue remedies available under C.R.S. § 24-50.5-104, including civil action where authorized by law.
8. False or Malicious Reports. Knowingly false or malicious reports are not protected under this Policy and may be cause for corrective action.
9. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
10. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.

**Exhibit D**  
**Policy on Digital Accessibility**

# KREMMLING SANITATION DISTRICT

## Policy on Digital Accessibility

Adopted: January 12, 2026

1. Purpose. The Kremmling Sanitation District (the "District") is fully committed to providing accessible digital information to all members of the public. Pursuant to C.R.S. § 24-85-103(2.5), the Chief Information Officer in the Colorado Governor's Office of Information Technology has adopted accessibility standards as specified in 8 CCR 1501- 11, Rules Establishing Technology Accessibility Standards (the "Rules"). As part of this commitment, the District has adopted this Policy on Digital Accessibility (the "Policy") to ensure the District's online services and digital communications comply with the Rules.
2. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with, the:
  - a. Technology Accessibility for Individuals with Disabilities, C.R.S. § 24-34-601 *et seq.*
  - b. Chief Information Officer's Rulemaking Authority, C.R.S. § 24-85-103(2.5).
  - c. Rules Establishing Technology Accessibility Standards, 8 CCR 1501- 11
  - d. Colorado Anti-Discrimination Act ("CADA"), C.R.S. § 24-34-301 *et seq.*
  - e. Americans with Disabilities Act ("ADA"), Title II, 42 U.S.C. §§ 12131–12165;
  - f. Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794;
  - g. Section 508 of the Rehabilitation Act, 29 U.S.C. § 794d (as incorporated by Colorado law).
3. Scope. The District is committed to providing persons with disabilities equal access to digital information, including information made available through the District's website and other digital content. This Policy has been developed to promote equal access to such digital information to persons with disabilities. This Policy applies to digital content produced by or under the control of the District, including the District's official website. Accessibility requests may be submitted to the District in accordance with this Policy.

Kremmling Sanitation District  
Policy on Digital Accessibility

4. Third Party Content. The provisions of this Policy do not apply to third-party websites linked through the District's website, such as state or federal agencies, or digital content, which is not under the control of the District. While the District is not responsible for ensuring the accessibility of third-party-controlled content, the District is dedicated to assisting individuals experiencing accessibility issues when possible.
  
5. Compliance.
  - a. Compliance Officer. The District Manager shall be the District's Compliance Officer, who will be the point of contact for accessibility-related accommodations for digital content. The compliance officer is responsible for responding to reports of inaccessible digital content and accessibility requests.
  
  - b. Testing Tools and Techniques. The District will utilize a variety of tools, techniques, methods, and procedures to identify accessibility barriers and meet existing and new assistive technology needs. The District has retained Streamline Software, Inc. (the "Accessibility Vendor") to complete testing and remediation, ensuring the website and digital content contained therein are accessible and inclusive for users with disabilities in accordance with the Rules.
  
  - c. Accessibility Reports. The Accessibility Vendor will review the District's website, user interfaces, and other digital content and summarize the same in a report provided to the District no less than annually (the "Accessibility Report"). The Accessibility Report will identify digital content that does not comply with the Rules. The Accessibility Vendor or the District, as appropriate, will take such steps as necessary to make such content compliant under the Rules. The District will maintain a record of the Accessibility Reports.
  
  - d. District-Controlled Content. The District will ensure that digital content under the control of the District produced, developed, maintained, modified, or used by the District on or after July 1, 2025, is compliant with the Rules.
  
6. Digital Accessibility Statement. The District will post the following digital accessibility statement on its website on or before July 1, 2025:

## Kremmling Sanitation District Policy on Digital Accessibility

### Website Accessibility Statement

The Kremmling Sanitation District is fully committed to providing accessible facilities, elements, and channels of communication to all members of the public. As part of this commitment, the Kremmling Sanitation District has a policy of providing an accessible website compatible with the Web Content Accessibility Guidelines (WCAG 2.1) and commercial screen-reading software. All features of the website are coded to allow individuals with vision and other impairments to understand and use the website to the same degree as someone without disabilities. We welcome feedback and can often resolve issues in a timely manner if they arise.

### Compliance Officer

The Kremmling Sanitation District has designated a compliance officer for website disability-related accommodations. The compliance officer has received training in website accessibility and updates the site in accordance with those best practices. Contact our compliance officer to report an issue.

### Compliance Procedures and Reports

In addition to testing with users with a wide range of disabilities and coding our website to WCAG standards, the Kremmling Sanitation District regularly scans its website to ensure ongoing compliance, and makes timely changes to any inaccessible changes, if any are found.

### Linked Documents and Third Parties

Please note that this site may link out to third-party websites, such as state or federal agencies, that do not have accessible content. This site may also include documents provided by third parties included in our agenda packets, for example. While we cannot control the accessibility of content provided by third parties, we are happy to assist any member of the public with reading and accessing content on our site.

See an opportunity for us to improve? Please contact our compliance officer or call us at (970) 724-3249.

Kremmling Sanitation District  
Policy on Digital Accessibility

7. Reporting Accessibility Issues.

- a. Reporting an Accessibility Issue. Individuals may report inaccessible content or requests for accommodations to the Compliance Officer. Such requests should identify the specific content that is being reported, the issue the individual is experiencing, and the name and contact information of the individual submitting the request. The Compliance Officer or their designee will confirm receipt of such requests within three (3) business days. The District is committed to resolving reports of inaccessible content and requests for accommodations within a reasonable period of time.

Any reports regarding accessibility issues should be addressed as follows:

Kremmling Sanitation District  
Attn: District Manager  
200 Eagle Ave | PO Box 538  
Kremmling, CO 80459  
(970) 724-3249

8. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
9. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.

**Exhibit E**  
**Policy on Electronic Signatures**

# KREMMLING SANITATION DISTRICT

## Policy on Electronic Signatures

Adopted: January 12, 2026

1. Purpose. The purpose of this Policy on Electronic Signatures (the “Policy”) is to authorize and govern the use of electronic signatures and electronic records in Kremmling Sanitation District (the “District”) transactions, consistent with Colorado law and best practices.
2. Authority. This Policy is adopted pursuant to, and shall be interpreted consistently with, the:
  - a. Colorado Special District Act, C.R.S. § 32-1-101 *et seq.*
  - b. Colorado Open Records Act (“CORA”), C.R.S. § 24-72-201 *et seq.*
  - c. State Archives and Public Records Law, C.R.S. § 24-80-101 *et seq.*
  - d. Colorado Uniform Electronic Transactions Act, C.R.S. § 24-71.3-101 *et seq.*
3. Electronic Signatures. The District authorizes the use of electronic signatures and electronic records in conducting District business to the same extent as handwritten signatures and paper records, except where prohibited by law or District policy. Electronic signatures and records executed in compliance with this Policy shall have the same legal effect and enforceability as handwritten signatures and paper records pursuant to C.R.S. § 24-71.3-107.
4. Scope of Authorized Use. Electronic signatures may be used for District business, including but not limited to:
  - a. Contracts and agreements.
  - b. Board resolutions and minutes.
  - c. Procurement and vendor documents.
  - d. Personnel and administrative documents.
  - e. Customer and operational forms.
5. Security and Authentication. Electronic signatures shall be executed using methods that identify the signatory, indicate the signatory’s intent to sign,

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Policy on Electronic Signatures

associate the signature with the relevant record, and preserve the integrity of the signed record. These requirements are intended to satisfy C.R.S. § 24-71.3-109.

6. Public Records. Electronic signatures and records are subject to inspection and disclosure under CORA to the same extent as paper records.
7. Limitations. This Policy does not expand the authority of any officer or employee to bind the District or override statutory requirements for approval, execution, or recordkeeping.
8. Supplement to Law. The provisions of this Policy shall be in addition to and in supplement of any law of the State of Colorado.
9. Amendment. The Board may amend this Policy from time to time, only in writing following a duly called meeting.