Implementing Board Policy 1.50.02
Contact: Chief Financial Officer, 434-5275

1.0 Purpose

To provide guidance regarding retention and management of electronic mail (e-mail) messages. To help employees and students determine what information sent or received by e-mail should be retained and for what time period.

2.0 Limitations and Requirements

- 2.1 E-mail messages are subject to the guidelines provided in chapter 40.14 RCW for the preservation and destruction of public records; as such they are managed through records retention schedules.
- 2.2 This e-mail retention procedure is secondary to the General Retention Schedule for Washington State Community & Technical Colleges (hereinafter, "retention schedule"); any current public record requests for specific public records; and any litigation hold notice for records in response to potential litigation.
- 2.3 This procedure addresses typical records that may be contained in e-mail and does not necessarily reference other types of records, such as paper or other types of electronic files or data. Those records are covered in depth by the retention schedule.
- 2.4 E-mail is defined as the messages sent and received by e-mail systems, including all transmission and receipt data. The body of the message, transactional information, and any attachments associated with the message are all considered a part of the retainable record.
- 2.5 Confidential and sensitive information should not be sent via e-mail. The privacy and integrity of an e-mail message cannot be guaranteed. Also, once created, there is no guarantee that attempts to erase or delete e-mail are effective.
- 2.6 Retention and disposition requirements for e-mail messages are always based on the content of the correspondence and the purpose of the message.

3.0 E-Mail Retention

- 3.1 The retention requirements for e-mail messages and attachments are the same as paper documents with identical content. The messages must be managed individually according to the designated retention period for the content.
- 3.2 E-mail messages that have no administrative, legal, or fiscal significance are not subject to retention and may be deleted as soon as the message has served its reference purpose. For examples, see section 6.0, below.
- 3.3 Only the official record copy of an e-mail must be retained. If the e-mail is part of a chain of e-mails, only the last message in the chain must be saved assuming all prior messages are contained within the chain.
 - 3.3.1 Generally, the <u>sender</u> is responsible for retaining e-mail messages generated within CCS and the <u>recipient</u> is responsible for retaining e-mail messages that originate outside CCS.
 - 3.3.2 If an e-mail message is received from a listserv or distribution list, only the department designated to retain such records is responsible for retaining the e-mail message.

E-mail Retention Page 2 of 4

4.0 Management of E-mail Records

4.1 CCS does not have an automated process for managing e-mail records; therefore, any CCS employee who creates or receives an e-mail message is responsible for the proper retention and disposition of that record (see, paragraph 3.3, above).

- 4.2 E-mail messages subject to retention must be retained in their electronic and native format until they meet their designated retention period. Printing and retaining a hard copy is not an acceptable substitute for the electronic message.
- 4.3 Employees may use one or more of the following methods for managing e-mail messages with designated retention periods.
 - 4.3.1 For short-term or temporary retention, retain the message in the original e-mail application on the employee's computer. E-mail applications capture and preserve all relevant metadata related to the record.
 - 4.3.1.1 To facilitate retrieval, retention, and disposition, the employee should establish separate electronic folders for filing e-mail messages within the e-mail application. Each folder should correspond to a specific record series and retention period.
 - 4.3.1.2 The employee is responsible for the retention and disposition of the records in accordance with paragraphs 4.4 and 4.5, below.
 - 4.3.2 For longer term retention and disposition, save the e-mail message to electronic folders on a shared server. Each folder should correspond to a specific record series and retention period.
 - 4.3.2.1 Save the e-mail message using the **.msg** extension, which will preserve the metadata. Once saved in an electronic folder, the e-mail message can be deleted from Outlook.
 - 4.3.2.2 This option allows all electronic records; i.e., e-mail, word documents and spreadsheets, with the same record series and retention period to be stored in one electronic folder.
 - 4.3.3 Employees may also retain specific types of e-mail records with longer retention periods by copying, blind copying, or forwarding messages to a group e-mail address established to retain such records. The records coordinator assigned to the group e-mail address is responsible for retention and disposition of the records.
 - 4.3.3.1 A list of established e-mail retention mailboxes is published on CCSNet on the Business & Finance web page under Records Management.
 - 4.3.3.2 To establish a new e-mail address for retention purposes, contact the CCS records officer at 434-5275.
- 4.4 E-mail messages that have met retention requirements should be deleted and documented on a CCS Records Disposition Log when the record is deleted.
- 4.5 E-mail records designated as "archival" must be transferred to the state digital archives; contact the CCS records officer at 434-5275, for assistance.

E-mail Retention Page 3 of 4

5.0 E-Mail Messages Typically Subject to Retention

Listed below are samples of e-mail messages that are usually subject to retention or archival requirements; this list is not comprehensive. The CCS <u>sender</u> is responsible for retention of the record.

- 5.1 Policy and Procedure Directives. Administrative policies and procedures addressing district-wide operations, critical college functions, or issues of public visibility or concern. May include formal directives, formal policy statements, bulletins, orders, rules or notices.
- 5.2 Executive Correspondence or Memoranda Related to Official College Business. Correspondence and memos at the executive level, to and from public officials, the public, and others concerning policy issues, concerns, actions or issues.
- 5.3 Routine Correspondence concerning day-to-day office activities. Includes correspondence between other departments within the college, routine correspondence with other agencies, and correspondence with the public on routine matters.
- Agenda and Minutes of Meetings. Includes management team meetings, governing body meetings, student government and club meetings, agency staff meetings, meetings which formulate policies, rules, or regulations, internal committees, task force committees, and other internal agency meetings which meet to coordinate activities, resolve problems, or serve as sounding boards or vehicles of communications.
- 5.5 Messages which document CCS actions, decisions, operations and responsibilities.
- 5.6 Documents related to legal or audit issues.
- 5.7 Documents that initiate, authorize or complete a business transaction.
- 5.8 Drafts of documents that are circulated for comment or approval.
- 5.9 Final reports or recommendations.

6.0 E-Mail Messages Not Typically Subject to Retention

Most e-mail consists of transitory messages and attachments that may be deleted when no longer needed. An e-mail message that is considered to have no administrative, legal, fiscal, or archival retention requirements may be deleted as soon as it has served its purpose. Such messages may include:

- 6.1 Informational messages and announcements not related to official business, such as announcements of retirement parties or holiday celebrations.
- 6.2 Information-only copies, duplicate copies, copies of published materials.
- 6.3 Miscellaneous Notices or Memoranda. Memos, bulletins or directions of a general information and non-continuing nature (i.e., meetings notices and requests for meetings, reservations, confirmations, itineraries, etc.).
- 6.4 Preliminary drafts of memos, letters, reports, worksheets, etc., that represent stylistic, spelling or grammatical changes.
- Requests for information. Routine memos or forms used to request, or respond to requests for information, forms, publications, etc.

E-mail Retention Page 4 of 4

7.0 Related Information

- 7.1 Chapter 40.14 RCW, Preservation and Destruction of Public Records
- 7.2 Chapter <u>434-662 WAC</u>, Preservation of Electronic Public Records
- 7.3 General Retention Schedule for Washington's Community & Technical Colleges
- 7.4 Administrative Procedure <u>1.50.02-B Records Management</u>
- 7.5 CCS <u>Desktop Records Retention Guide</u>
- 7.6 CCSNet web page, Records Management
- 7.7 CCS Records Disposition Log, CCS 1443
- 7.8 CCS E-mail Retention Mailboxes (currently being developed)

Originated: April 2009

Cabinet approval: May 18, 2009