

E-Mail Retention, Preservation, and Storage Policy

Section 1. Purpose. The purpose of this policy is to establish an e-mail policy for all East Allen County Schools' schools, departments, and offices that create, use, and manage e-mail as part of the daily transaction of business.

Section 2. Scope. This policy applies to all e-mail and e-mail attachments created or received by East Allen County Schools' personnel and circulated within the Corporation. Where an individual uses a privately owned computer and a private ISP or e-mail provider to conduct public business of the Corporation, that portion of the e-mail resource that carries Corporation public records is included within the scope of this Policy.

Section 3. Background. Since e-mail messages may qualify as both public records and business records and, in some cases, may be the only record created that documents a transaction, an action taken, or a policy determination or interpretation, the effective management of e-mail must be one of the primary objectives of the Corporation's records management program.

Section 4. Treatment of E-Mails. E-mails are not treated differently than any other Corporation documents. It is the substance (content) of the e-mail that is the determining factor in establishing the document's retention or destruction.

Section 5. Classification of E-Mails. E-mails can be categorized into three broad categories:

1. "Transitory" and "duplicate" messages, including copies of e-mails sent to several persons, as well as casual, routine, or personal communications.
2. Public records with less than a permanent retention period.
3. Public records with a permanent or archival retention period.

Section 6. Definition of "Transitory" Messages. "Transitory" messages are messages that do not a) set policy, b) establish guidelines or procedures, c) certify a transaction, or d) become a receipt. "Transitory" documents serve to convey information of temporary importance. The following types of e-mail are considered "transitory":

1. Incoming List serve messages
2. Personal e-mails
3. Spam
4. Non-policy Corporation announcements
5. Telephone messages

6. Published reference materials
7. Invitations to meetings and replies
8. "Thank yous"
9. Replies to routine questions
10. Out-of-office auto-replies

Section 7. Definition of "Duplicate" Messages. "Duplicate" messages are messages sent to multiple people within the Corporation. Information transmitted in this manner is considered a duplicate record. If retention is required of the original message, only the sender is obligated to retain the e-mail in accordance with the appropriate retention schedule.

Section 8. E-Mail Messages Required to be Retained. The following categories of e-mail messages require some level of retention:

1. Messages containing information developed in preparing position papers, reports, and studies.
2. Messages reflecting official actions taken in the course of conducting Corporation business.
3. Messages conveying information on Corporation programs, policy decisions, and essential transactions.
4. Messages conveying statements of policy or the rationale for official decisions or actions.
5. Messages documenting oral exchanges, such as meetings or telephone conversations, during which policy was discussed or formulated.
6. E-mail calendars reflecting the daily appointments of personnel conducting Corporation business.

Section 9. Retention Guidelines. The retention of all e-mail records maintained in electronic files is the same as for similar records maintained in traditional paper formats unless otherwise specified. Any attachments to an e-mail shall be preserved for as long as the e-mail message is maintained. "Transitory" and "duplicate" e-mail messages are not required to be retained and may be deleted. "Non-transitory" e-mail messages with less than a permanent retention period shall be retained for the same period established for equivalent hard copy records in Policy 3560 and may be retained in hard copy or electronic format, which can be retrieved and interpreted for the legal retention period.

E-mail messages with a permanent or archival retention period may be retained in the form of a hard-copy printout or microfilm that is eye readable without interpretation.

Section 10. Purging or Deleting E-Mails. All East Allen County Schools' e-mail users should review e-mails (both received and sent) at least weekly. Those e-mails that need to be retained should be moved to another appropriate electronic environment, medium or archive or copied on paper; those that do not need to be retained should be deleted. The Technology Department will automatically purge e-mails from the server after 180 days. This system purging will be automatic and permanent. This system purging is to ensure the proper functioning of the Corporation's e-mail system. It is the user's responsibility to ensure that e-mails that are to be retained are removed from the server and archived in a timely manner.

Section 11. Limitations on Purging/Deletion. When there is a pending public records access request or a likelihood of litigation, audit, or investigation, regularly scheduled purging or deletion of related e-mail messages must be suspended until the risk is settled or until legal advice has been obtained concerning disposition of any impacted e-mail message.

Section 12. Default Retention Period. If no specific retention period is established in Policy 3560 for an equivalent hard copy record, the e-mail record shall be maintained for a period of three years.

Section 13. Preservation.

1. Preservation: Electronic messages preserved in an electronic format will be maintained in a manner that assures their authenticity, reliability, and integrity. They must contain sufficient data about the creation, routing, and receipt of the message as well as other objects such as text files, embedded documents, images, or hyperlink references. The record must be accessible in a usable manner throughout its lifecycle.
2. Migration: When messages identified as agency records are to be migrated, they must be moved to a storage medium and format that protects the content, metadata, attachments, hyperlink references and proof of delivery receipt when applicable. A migration audit trail shall be maintained with the record.

Section 14. Storage.

1. Unnecessary electronic mail: Unnecessary electronic mail messages should be deleted by end users to avoid excess accumulation and demand for storage on electronic mail servers. Unnecessary e-mail is that which is not a public record or required for continued efficient work effort by the end user.

2. Business critical information: Electronic mail messages that are public records should be stored outside the desktop local drive (e.g. the "C" drive) or end user device and successfully backed up.
3. Backup: Backup of messages is used to allow recovery of lost or damaged e-mail resources and not as a means of e-mail retention or retrieval.

Section 15. Confidentiality/Security. Applicable confidentiality and security requirements for the content of e-mail messages and attachments must be maintained throughout the life of the record.