

# EMAIL MANAGEMENT GUIDELINE

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**PURPOSE:** State and local government agencies need to know how to manage and preserve emails, and the Division of Archives and Records Service has the responsibility to establish standards and provide training for the effective management and care of records ([Utah Code 63A-12-101\(2\)\(c\)](#)). Acknowledging that records management needs, workloads, and complexities vary widely across government, the intent of this guideline is to establish baseline standards that ensure legal compliance but are still broad enough to provide each governmental entity the flexibility to shape management practices to fit its unique requirements.

## Contents

Legal Requirement .....	2
Retention Schedules for Email .....	2
Applying Retention Schedules to Email .....	4
Email Management Tools .....	4
Common Email Tools .....	4
In-Application Records Management Tools.....	5
Independent Email Management Applications .....	5
Preserving Emails Outside of an Email System .....	6
File Type .....	6
Exporting Tools .....	6
Storage .....	6
Creating an Internal Email Management Policy .....	6
Elements to Consider .....	7

Sample Email Policies.....	7
Resources for Further Study .....	7
Government .....	8
Professional Organizations .....	8
Vendors .....	8
Works Cited.....	10

## Legal Requirement

[Utah Code 46-4-501\(5\)](#) requires that all electronic records created or received by a state government agency must be managed according to retention schedules established with the Division of Archives and Records Service and approved by the State Records Committee. Local government agencies, also known as political subdivisions, have a choice. They can manage their records according to retention schedules established with the Division of Archives and Records Service and approved by the State Records Committee, or they can create and authorize their own retention schedules, including schedules for email, using the process described in [Utah Code 63G-2-701\(2\)](#).

## Retention Schedules for Email

Email communications play an essential role in government processes and need to be retained as long as the other records that document that process. Examples include attorney correspondence with clients (Litigated claims case files, record series [274](#)), investigations of utility companies (Investigation and suspension docket, record series [698](#)), getting environmental clearances for construction projects (Construction project files, record series [26199](#)), etc. Email messages that document processes must be maintained according to retention schedules governing any other records that document those processes. Required retention potentially can require that records be maintained for decades or even be transferred to the State Archives for permanent preservation.

In addition to capturing email based on association with government processes, the State Records Committee has approved a retention schedule (see below) that applies a modified version of the U.S. National Archives and Records Administration (NARA's) Capstone Approach to Utah state government.

- **State Agency Executive Correspondence (GRS-1758)**  
*Incoming and outgoing business-related correspondence, regardless of format or mode of transmission, that provides unique information relating to the functions, policies, procedures or programs of a state agency. These records document executive decisions made regarding agency interests. Executive decision makers may include the Director, Chief Administrative Officer, Public Information Officer, or other internal administrators as identified by the executive office.*  
**Permanent. Retain for 5 years after separation, then transfer to the State Archives.**  
 (Approved 07/2018)

The intent is to allow “for the capture of records that should be preserved as permanent from the accounts of officials at or near the top of an agency or an organizational subcomponent,” according to the [bulletin](#) released by NARA in 2013 (U.S. National Archives and Records Administration 2013). In other words, executive email for state governmental entities is managed based on the position of the email account owner rather than the content of individual email messages. The email of executive directors, division directors, chiefs of staff, etc., should be transferred to the State Archives to be preserved permanently. Additional accounts may be distinguished as executive in cases where an employee’s email likely is historically valuable. This approach has been implemented in order to capture a historical record of each government agency.

General retention schedules that apply to all entities, including local government and political subdivisions, provide each entity with discretion about how to manage email in order to meet administrative needs and maintain a historical record. The length of time that email should be kept is based on the content of the record and its value. Although the majority of emails have only short-term value, email that documents policy development and decision-making is considered historically valuable and should be preserved permanently, along with other records that document these processes. This is specified in the following general retention schedule:

➤ **Program and Policy Development Records (GRS-1717)**

*These records are created by executive decision-makers to document the establishment and dissemination of agency programs, policies, and procedures. Executive decision-makers may include the Chair, Director, Chief Administrative Officer, Public Information Officer, Commissioner, Mayor, or other internal administrators as identified by the executive office. Related correspondence and email is included.*

**Permanent. Retain for 3 years after final action, then transfer to the State Archives.**

(Approved 07/2018)

Emails not managed by a more specific schedule, as in the above examples, should be managed according to the state’s general retention schedules for correspondence which were approved by the State Records Committee, per [Utah Code 63G-2-604\(1\)](#) and [Utah Code 63G-2-502\(1\)\(b\)](#). Below are the remaining general retention schedules for correspondence:

➤ **Transitory Correspondence (GRS-1759)**

*Incoming and outgoing correspondence, regardless of format or mode of transmission, related to matters of short-term interest. Transmittal correspondence, including email, is transitory unless part of another process. This correspondence does not impact agency functions. When resolved, there is no further use or purpose.*

**Retain until resolution of issue and then destroy.**

(Approved 07/2018)

➤ **Routine Administrative Correspondence (GRS-1760)**

*Incoming and outgoing business-related correspondence, regardless of format or mode of transmission, created in the course of administering agency functions and programs. Administrative correspondence documents work accomplished, transactions made, or actions taken. This correspondence documents the implementation of agency functions rather than the creation of functions or policies. Business-related correspondence,*

*including emails, that is related to a core function with an associated retention schedule should follow the associated schedule.*

**Retain for 3 years and then destroy.**

(Approved 07/2018)

Retention should be based on the content of the record and its value, not on its format or storage medium.

## Applying Retention Schedules to Email

The Division of Archives and Records Service recommends that, wherever possible, retention rules in email systems be adjusted to comply with legally mandated retention schedules.

- Transfer emails of governmental entity executives (e.g., department and division directors, but also mayors, commissioners, council chairs, etc. at agency's discretion) to the State Archives after separation for permanent preservation.
- Governmental entities should identify groups of records that need to be kept longer than three years, assign them "labels" or "categories," use retention schedules to record how long the group of records needs to be kept, and set up retention rules for the records contained in these record series.
- Transitory emails (those with only very short-term purposes) should be deleted from email accounts once their administrative purpose ends.
- Emails not deleted as transitory and not identified and labeled to be kept for a specified amount of time (according to an associated retention schedule) should be deleted after three years.
- Emails that are personal communications unrelated to the public's business or that are written by an employee in a capacity other than the employee's governmental capacity are not records as defined in the law ([Utah Code 63G-2-103\(22\)\(b\)\(i\)](#)). These emails are not governed by retention schedules and should not be kept in government email accounts.

## Email Management Tools

### Common Email Tools

The most common tools for records management are the built-in features of the email system itself. Features usually include labels, folders, tags, and multiple inboxes, along with more advanced features such as script implementation. Using the label and similar identifiers to demarcate different series or retentions can be particularly helpful.

- **Example:** Jill is a member of the public and uses our services. I know that all my email correspondence with Jill is going to be about her appointments, which are not permanent records. I can create a rule to apply the label "appointment" to her emails.

Later, I can find all the emails under the “appointment” label and dispose of them according to their retention schedule.

- **Example:** I receive many emails from my co-worker, Ricardo. Some of the emails are about a project we’re working on, and those emails should be kept the same period of time as the project. Other emails from Ricardo are simple questions about where we keep the supplies, or other matters of a transitory nature. I tag Ricardo’s emails manually: for project records, I tag with “project,” but for other emails, I use the “transitory” tag.

Applying a label to each email may sound like a big investment of time, but it’s easy to do once it becomes habit, and it only takes about one or two seconds per email (fewer if there are automatic rules set up).

### In-Application Records Management Tools

Some large systems, such as Microsoft and Google, have records management capabilities available for paid accounts. Users can create retention periods based on various attributes (such as label, date, user, etc.), place a legal hold, and more. See the Resources for Further Study section of this guideline to learn more about Google and Microsoft capabilities.

### Independent Email Management Applications

There are numerous independent software applications available for email management, some of which are integrated with more general records management applications. Agencies should consider the following when looking into email management software:

- Can email be sent, received, classified, and stored directly within the system? Or do emails need to be exported from the system?
- Can emails and accounts from other email systems be imported if needed?
- Can the records be exported to a different system if needed?
- Who owns the records--the owners of the application or the agency?
- Where is the data stored? Is it on-site? Off-site? In the cloud?
- Does the application integrate with other agency systems and records management tools?
- What are the search capabilities of the system? Will users be able to find what they are looking for?
- Can retention schedules or rules be applied? How are the files deleted when the retention is up?
- Is the data backed up?
- Is the data secure?
- Can a legal hold be set?
- Can records be classified?
- How is the system administered? Who will have what levels of access?
- Is the application user-friendly? Does it make sense? Is there support if needed?

Records managers may not know what their agencies need at the onset, but can refine their requirements as they learn and explore possibilities. Local records management or professional associations may be able to provide information about what applications and procedures similar agencies are using and how well they are working.

## Preserving Emails Outside of an Email System

Email that needs to be kept longer than the email system is capable of must be exported and saved elsewhere.

A copy of email which has historical value, including executive's email, should be transferred to the Division of Archives and Records Service.

### File Type

Non-proprietary file types are best for preserving email because they are not associated with any vendor-owned product. File types should be open source, uncompressed or not utilizing lossless compression, and self-documenting, which means that instructions for rendering and viewing the file is either embedded within the document itself or freely available in multiple places online. EML, MBOX, and plain text (with *all* metadata included) are preferred formats that meet these criteria. They can be viewed using a variety of programs or file viewers and have a good chance of being readable in the future.

### Exporting Tools

Most email programs, including Gmail, Outlook, and Hotmail, have large-scale export capabilities, but some programs do not. Each program has a different process, some may require an add-on, but instructions usually can be found online for the required processes. Emails in a system that does not have large-scale export capabilities will need to be migrated into an email program that does (i.e., Outlook, Gmail, or Hotmail), and then be exported from there.

### Storage

As when handling any electronic record, choose a medium on which to store the records that is stable and will last as long as the records need to be kept. Identify the retention schedule for the records and assess the risk to your agency if the record is lost. The more important the record is, the more you may be willing to invest in order to preserve and keep the files accessible. Emails can be stored on-site, off-site, and/or in the cloud. It can be as simple as saving exported files on a DVD or on a backup server, or as complicated as working out the terms of a contract with a third-party vendor for cloud storage. Great resources are available to aid in making these decisions. Examples are ARMA International's *Guideline for Evaluating Offsite Records Storage Facilities* and *Guideline for Outsourcing Electronic Records Storage and Disposition*.

## Creating an Internal Email Management Policy

All agencies, both state and local, should create an internal email management policy to disseminate to employees. Policies should be developed with all relevant stakeholders and should address applicable records management laws and regulations. In addition to outlining

appropriate use of the email system, agency policies should inform account holders of their responsibilities for managing records and help employees distinguish between permanent, administrative, transitory, and non-record email messages (U.S. National Archives and Records Administration 2016).

## Elements to Consider

Consider the following when creating your policy:

- How the email system is intended to be used
- Inappropriate content and consequences for violation
- Agency monitoring of accounts
- Use of:
  - personal devices
  - personal accounts
  - labels, folders, tags, or other internal organizational strategies
  - scripts, extensions, and add-ons
  - other/bundled suite applications
  - email exporting tools
- Retention of email records
- Applicability of policies to:
  - attachments
  - chats/instant messages within the email system
  - associated records that are not email
- Policy roll-out
  - Employee training
    - technical training on how to use the system
    - information security training
    - records management training

## Sample Email Policies

Utah Department of Administrative Services

- [Email Management](#), 2014
- [Employee Information Security](#), 2013

Salt Lake City

- [4.01.06 Electronic Communication Policy](#), 2010
- [Electronic Communications Procedure](#), 2010
- [Acceptable Use Procedure](#), undated

## Resources for Further Study

## Government

### National Archives and Records Administration (NARA)

- [Capstone Training and Resources](#)

### Utah Division of Archives and Records Service

- [Records Management Essentials](#), 2018
- [Managing Electronic Correspondence Records](#), presentation given to USHRAB in 2017
- [Records and Information Management Specialists](#) (formerly known as Records Analysts)

### Utah Department of Technology Services

- [Rule R895-7. Acceptable Use of Information Technology Resources](#), 2013

### New York State Archives

- [Developing a Policy for Managing Email](#) by Ann Marie Przybyla, 2010

## Professional Organizations

**Association for Intelligent Information Management (AIIM)** – <http://www.aiim.org/>  
Toolkits, webinars, presentations, blogs, etc., available upon purchase

**ARMA International** – <http://www.arma.org/>

Guidelines, webinars, blogs, periodicals, etc., available upon purchase or with membership

- [Best Practices for Managing Electronic Messages](#), 2013
- [Guideline for Outsourcing Electronic Records Storage and Disposition](#)

**International Institute of Municipal Clerks (IIMC)**, in conjunction with **National Association of Government Archives and Records Administrators (NAGARA)** and the **Municipal Clerks Education Foundation (MCEF)**

[Email Management](#) by John Annunziello. 2012, Local Government Records Management Technical Publication Series

## Vendors

### Google

Search operators you can use with Gmail, Google, 2018  
<https://support.google.com/mail/answer/7190?hl=en>

Google Vault Help: What is Google Vault?  
<https://support.google.com/vault/answer/2462365?hl=en>

Google Vault: How retention works  
<https://support.google.com/vault/answer/2990828>

Google Vault: Manage destruction holds

<https://support.google.com/vault/answer/2473591>

Google Vault: Search for data

<https://support.google.com/vault/answer/2462480>

### **Microsoft Outlook**

Assign retention policy to email messages

<https://support.office.com/en-us/article/assign-retention-policy-to-email-messages-3e5fd2dc-633f-4a38-b313-b31b81f7cf7a>

What is a Microsoft Exchange account?

<https://support.office.com/en-us/article/what-is-a-microsoft-exchange-account-47f000aa-c2bf-48ac-9bc2-83e5c6036793?ui=en-US&rs=en-US&ad=US>

Outlook license requirements for Exchange features

<https://support.office.com/en-us/article/outlook-license-requirements-for-exchange-features-46b6b7c5-c3ca-43e5-8424-1e2807917c99?ui=en-US&rs=en-US&ad=US>

Export or backup email

<https://support.office.com/en-us/article/export-or-backup-email-contacts-and-calendar-to-an-outlook-pst-file-14252b52-3075-4e9b-be4e-ff9ef1068f91>

## Works Cited

- U.S. National Archives and Records Administration. 2013. "Bulletin 2013-02: Guidance on a New Approach to Managing Email Records." *National Archives*. August 29. Accessed May 03, 2018. <https://www.archives.gov/records-mgmt/bulletins/2013/2013-02.html>.
- . 2016. "Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)." *National Archives*. April 06. Accessed May 03, 2018. <https://www.archives.gov/files/records-mgmt/email-management/2016-email-mgmt-success-criteria.pdf>.