

## **Management System: Information Resource Management (IRM)**

### **Subject Area Description: Computer Systems Management (Including Help Desk)**

# **Policy: Email Retention, Storage and Archiving**

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**Subject Matter Expert:** Lisa Rawls

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**Revisions:** 3

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## **1.0 Purpose**

For the purposes of information system performance, records management compliance, and to enable efficient discovery of electronically stored information (ESI), the Environmental Management Consolidated Business Center (EMCBC) is establishing this policy to define the limits on email storage and archiving within the EMCBC network.

## **2.0 Scope & Applicability**

This policy applies to all email messages and the associated attachments that are sent to, received by, sent from or stored within the EMCBC email server(s) (i.e., email addresses ending with @emcbc.doe.gov). In addition, this policy applies to all email archive files (.pst files) and to individual files in email message format that are stored and accessed within the EMCBC network, including those which may be stored within the email archiving server, on other network servers, on desktops or on EMCBC laptops. It also applies to these files when they are accessed via the EMCBC network from removable media such as flash drives, compact disks (CD) or digital versatile disks (DVD).

This policy does not apply to emails sent or received via web browser or other internet access tools, whether from within the EMCBC network, the EMCBC Guest Network or from outside internet access using EMCBC equipment such as Blackberries, Laptops or Cell Phones, except when that email is sent or received by the EMCBC email server or stored within the EMCBC network.

This policy is applicable to all individuals with access to the EMCBC network, whether they have an EMCBC email account or not.

### 3.0 General Information

#### 3.1 Responsibilities

Office of Technical Support and Asset Management (OTSAM) Records Management (RM) staff	Responsible for implementing a process for categorizing and dispositioning all email messages that is consistent with the EMCBC Master File Plan (MFP). RM, along with the Office of Information Resource Management (IRM), shall determine implementation of the 180-day deletion process for both pre-existing and current non-record/transitory email messages.
Assistant Directors	Will work with RM to develop an implementation process for their respective organization.
Information Resource Management (IRM)	Is responsible for implementing this policy within the EMCBC computing infrastructure.
All staff with an EMCBC email address	Are responsible for compliance with all EMCBC records procedures and plans, including the identification and categorization of email records including: <ul style="list-style-type: none"> <li>• Record/non-record determination,</li> <li>• Creation of Outlook folders to allow segregation of records based on the MFP,</li> <li>• Working with RM staff to obtain necessary Electronic Records Management System (ERMS) training.</li> </ul>

3.2 A combination of hardware and software solutions shall be implemented to achieve the desired objectives. An EMCBC Email Archive System was established to store email messages and subsequently serves as a repository for the ERMS (also known as CA Records Management [CARM] or Autonomy Records Management [ARM]). This allows for the integration of emails designated as records to be stored and dispositioned electronically according to the retention requirements referenced in the EMCBC MFP as established by Department of Energy Record Disposition Schedules.

### 3.2.1 Discovery

All emails within the scope of this policy, regardless of the storage location, storage media, format or status as a Record/non-Record, are subject to the same requirements for a request pursuant to the Freedom of Information Act (FOIA), Privacy Act, Discovery or other procedural protocols for records. All emails exempt from disclosure under FOIA or the Privacy Act will remain exempt. There is no expectation of privacy for any email within the scope of this policy.

### 3.2.2 Inbox/Sent Box Time Limit

Emails sent to or received by the EMCBC email server(s) are retained in the user's Inbox folder for a limited time period. This time limit is referred to in this Policy as the Email Mailbox Retention Time Limit, is operationally determined based on network performance and storage parameters, and is set to 60 days.

### 3.2.3 Automatic Archiving

At the end of the Email Mailbox Retention Time Limit (60 days), emails remaining in the user's Mailbox are automatically archived to the EMCBC Email Archive System, where they will remain available for access via Outlook or Webmail. (The Mailbox includes Inbox, Sent Items, Deleted Items, etc.)

### 3.2.4 EMCBC Email Archive System (Enterprise Vault, aka eVault)

The EMCBC Email Archive System has been established as the sole repository for email messages stored within the EMCBC network past the Email Mailbox Retention Time Limit. Archived by eVault simply means the email is now being stored on a separate device. It does not mean the email is being handled as a record.

### 3.2.5 User Initiated Archiving

Users may archive (manually or via pre-set rules) the email messages to the EMCBC Email Archive System in advance of the Email Mailbox Retention Time Limit. These archived messages will remain available for access via Outlook or Webmail until they are dispositioned according to the EMCBC MFP (records) or according to Section 3.2.10 of this policy (non-records).

### 3.2.6 Personal Archive Files Not Permitted

Users are not permitted to store emails in personal archive files (.pst files) or in individual files in email message format on network servers, laptops, desktop computer hard drives, removable media, nor may they use the EMCBC network to access such files stored on removable media such as flash drives.

### 3.2.7 Existing Personal Archive Files Centralized

All messages contained in pre-existing personal archive files (.pst files) or in individual files in email message format, including those accessed within Outlook as well as those stored on network servers, desktop computer hard drives or removable media such as flash drives, shall be imported into the EMCBC Email Archiving System at the time they become available to the system, typically when the user opens Outlook or during periodic sweeps of network servers. After importation, the user will continue to access the messages as accustomed via Outlook with enhanced ability to access the archive folders via remote connections, Webmail and from any desktop on the network. Section 3.2.12 further describes the handling of these pre-existing email messages.

### 3.2.8 Legal Holds and Destruction Moratoria

This Policy does not supersede or contradict any requirements for legal holds or destruction moratoria, which include Record, Transitory and Non-Record Email. Legal holds and other destruction moratoria take precedence over this policy as well as record schedules. NO emails under a legal hold or destruction moratorium will be deleted as a result of this policy.

### 3.2.9 Consistent with Records Policy

This policy does not supersede or contradict the Management System Description - Records Management, which controls the process of identifying and retaining records, including an email record.

### 3.2.10 Transitory and Non-Record Email

In accordance with DOE Record Disposition Schedules, transitory email records (i.e., email records with retention times of less than 180 days) and non-record emails can be managed within the EMCBC Email and Email Archiving System, without requiring specific declaration or transfer to the ERMS. Subject to the satisfactory completion of all elements of the phased approach described in Sections 3.2.11 and 3.2.12 below, all such emails, unless they are part of a legal hold or destruction moratorium, will be automatically, permanently removed from the archive server at the end of a 180 day retention period, as per those schedules.

### 3.2.11 Temporary Suspension of 180 Day Deletion

During the time period between the implementation of this policy and the full deployment of an ERMS capable of handling the email records, the maximum 180 day retention policy on current incoming and outgoing emails is suspended. The 180 day retention policy on current emails will be implemented as part of the ERMS deployment.

3.2.12 Handling of Pre-Existing Emails

Recognizing the extensive volume of pre-existing email content, the 180 day maximum retention policy on pre-existing emails is also suspended. The EMCBC Records Management Staff is responsible for training staff on utilizing the ERMS and implementing a process for categorizing (scheduling) and dispositioning pre-existing and new messages that is consistent with the EMCBC MFP. All email users shall be responsible for complying with this implementation plan.

**4.0 References –**

- 4.1 Department of Energy Record Disposition Schedules,
- 4.2 Management System Description – Records Management
- 4.3 Management System: Records Management: Procedure 1: Identifying, Filing and Maintaining Paper Records
- 4.4 Management System: Records Management; Procedure 2: File Plan Maintenance, Attachment 1 - EMCBC Master File Plan
- 4.5 Management System: Legal Services: Subject Area Description; Support and Information Access, SAP-OCC-206B-01, Electronic Discovery

**5.0 Definitions - None**

**EMCBC RECORD OF REVISION**

Document Title: EMAIL RETENTION, STORAGE AND ARCHIVING

If there are changes to the controlled document before the two-year review cycle, the revision number stays the same; one of the following will indicate the change:

**I** Placing a vertical black line in the left margin adjacent to sentence or paragraph that was revised; or

**I** Placing the words GENERAL REVISION at the beginning of the text. This statement is used when entire sections of the document are revised.

If changes and updates occur at the two-year review cycle, the revision number increases by one.

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<b>Rev. No.</b>	<b>Description of Changes</b>	<b>Revision on Pages</b>	<b>Date</b>
1	Original Procedure	Entire Document	8/28/2009
2	References updated	1, 2	9/12/2012
	Clarified responsibilities in 5.0	2	
	Added CARM as Electronic Records Management System	2	
	Added time limit for automatic archiving, specified Mailbox contents	3	
	Defined eVault	3	
3	Format updated	Entire Document	4/7/2015
	Reference updated	1	
	Added sentence on exemption to emails covered by FOIA or Privacy Act	3	