

## Missoula County E-mail Retention Policy Capstone Approach

### Purpose

This policy implements a “Capstone” approach for retaining and disposing of Missoula County (“County”) records created received and sent using accounts in the County’s email system including but not limited to: email messages and attachments, notifications, voicemail, calendar appointments, tasks, notes, faxes and contacts (“e-mail.”).

**Background:** This policy enables the County to retain email in an appropriate electronic system that supports records retention requirements including the capability to identify, retrieve, and retain the records for as long as they are needed.

The Capstone approach should improve records management for email by automating email capture and retention by a system rather than relying on the independent decisions of individuals. The approach provides a systematic, transparent, reliable and consistent approach to retaining and disposing of e-mail by:

- basing email records retention on the account owner’s role in the County rather than on the content of each email, and
- automating email capture and retention according to simplified, role-based retention periods.

### Scope

**Official Repository:** Missoula County hereby designates the County’s Evault system as the official record repository for County e-mail records. After messages are culled by the County’s Spam filtering system, the County’s email system captures, and journals e-mail at the point it is sent or received by a County email account, and this date and time is used to calculate the official retention time for e-mail messages. See Administrative Schedule 30 – Capstone Approach for Email Records for further information about the County’s use, search and retrieval of e-mail.

**NOTE:** Currently, Capstone applies only to County email records stored in the County’s email system, as defined above.

## Policy

### Explanation of the County “Capstone” Approach

Under the Capstone approach, the County manages email records based on the organizational role of the account user and/or office rather than on the content of each email. Emails are captured and managed according to the user role using the following retention approach:

- a. **Email Records of Designated Capstone Officials:** Capstone officials are elected officials, directors, department heads, appointed officers, and high-level assistants who perform functions on behalf of named capstone officials under the officials’ name (ie., an assistant authorized to send email from an account bearing a capstone official’s name). Other positions designated by an agency for Capstone retention also applies.
  - (1) **Retention:** Permanent
- b. **Email Records of Designated Supervisory/Project Management Employees:** .  
Supervisory/Project Management positions. Mid-level supervisory functions and/or positions responsible for major capital project management
  - (1) **Retention:** 10 years
- c. **Email Records of Support and/or administrative positions** Non-supervisory positions carrying out routine and/or administrative duties. These duties comprise general office or program support activities and frequently facilitate the work of agencies and their programs. This includes but is not limited to roles and positions that process routine transactions; provide customer service; involve mechanical crafts, or unskilled, semi-skilled, or skilled manual labor; respond to general requests for information; involve routine clerical work; and/or primarily receive non record and/or duplicative email.
  - (1) **Retention:** 3 years
- d. **Email Records of all other email account holders:** All other email holders not falling into the other categories.
  - (1) **Retention:** 7 years.
- e. **Exceptions:**
  - (1) **Records subject to legal hold or an open public records request**  
Records subject to a formal legal hold order and/or an open records request will be segregated in the County’s eDiscovery system and will not be disposed until authorized by the appropriate authority. For the purposes of this policy, a former legal hold is any notification by a claimant, his or her attorney, the Missoula County Attorney's Office, the Director of Risk Management, or any other party that indicates the records may be subject to litigation or necessary for other legal purposes.

- (2) **Emails required to be retained with related records:** If department policy requires email records to be retained with other records (such as part of a case file) in another recordkeeping system, the records may be stored in another recordkeeping system and retained in accordance with

#### **AD Account Designation**

The County's Director of Technology consulting with Human Resources, County Officers, and individual departments will designate the roles of email accounts using County job descriptions relating to each position.

#### Role Changes

If an employee changes their role in the organization and moves from a position where their new role increases the number of years their e-mail will be retained (ie. moves from an "Other Account holder" position to a "Financial employee" the retention of the e-mails on their email account will change to reflect the retention requirement of their new role. If an employee changes their role in the organization and moves from a position where the new role has reduced e-mail retention requirements (ie. moves from a "Financial employee" to "Other Account Holder," the retention on their email will not be changed.

#### **Record Disposal Authorization/Account Deletion**

The County's IT Department will dispose of e-mail records once the message has met the retention requirements outlined in this policy and Schedule X, Capstone Approach for E-mail Records. E-mail records disposed in accordance with this policy are hereby deemed approved in accordance with Schedule 30 – Capstone Approach for email Records.