

Retention of Electronic Communications

OVERVIEW

Records conveyed electronically are subject to University and departmental retention schedules (*BPPM* 90.01). Electronic communication records may also be subject to public records requests, legal discovery, and audit review.

Electronic communication methods include, but are not limited to, e-mail, instant messaging, social networking (e.g., Twitter, blogs, wikis), text messaging, and voicemail messages.

For retention purposes, electronic communications are considered methods of delivery rather than record types. Electronic communications, like conventional paper-based mail, can convey many kinds of records and messages. As such, electronic communications are to be managed by message content.

Management Responsibility

The University does not have a central process for managing electronic communication records, thus management responsibility resides with University staff and departments.

RETENTION OF ELECTRONIC COMMUNICATIONS

Personal Electronic Communications

If conditions specified in *BPPM* 20.37 are met, University employees may make occasional but limited use of University computers or accounts to briefly retain personal electronic communication messages unrelated to official University business.

Personally-Owned Computers or Personal Electronic Communications Accounts

University employees should not use personally-owned computers or personal accounts (e.g., non-University e-mail accounts) to retain official University business-related electronic communication messages.

- When working from personally-owned computers, employees are encouraged to use remote desktop connections and retain official messages on University computers and accounts.
- When it is necessary to generate an official message on a personally-owned computer or account, the employee is responsible for expediently moving the message to a University storage device or computer for retention.

NOTE: University business-related electronic communications stored on non-University computers or electronic communications accounts may be subject to public records requests, legal discovery, court-ordered production, audit review, and records retention requirements.

Retention of Electronic Communications

Social Networking Websites When retention of authorized electronic communications is outside University control, e.g., retention of postings to social networking websites, departments must consider what other records need to be retained. E-mail confirmations of each post or comment are possible examples.

Departments must consider records retention issues when considering any agreements with vendors of social networking websites and when configuring settings for departmental social networking website accounts.

Text Messages

University business-related text messages are considered public records whether a WSU or personal telephone is used for texting. Retention of text messages is the responsibility of the receiver unless the message is sent to several recipients, in which case, the sender is the responsible record holder. (See [Primary Record Holder](#).)

It is important to retain text messages in the original electronic format and manage retention in a way that complies with public records retention guidelines. (See [Management of Electronic Communication Records](#).) The following methods may be used to retain text messages:

- Manually save text messages to a University-controlled storage device such as a content management system or server.
- Send the text messages to a University email account.

Other methods may be used to retain text messages, as long as the messages are saved on a University-controlled electronic system that can be easily managed for records retention purposes.

For directions on how to save text messages, WSU personnel need to contact the applicable cellular telephone service provider, whether it is a WSU or personal telephone.

Voice Mail Messages

University business-related voice mail messages are considered public records whether the message is received on a WSU or personal telephone. Retention of voice mail messages is the responsibility of the receiver.

It is important to retain voice mail messages in the original electronic format and manage retention in a way that complies with public records retention guidelines.

(See [Management of Electronic Communication Records](#).) WSU personnel need to contact their IT department for directions on how to save voice mail messages on office desk telephones.

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Voice Mail Messages (cont.) For directions on how to save voice mail messages on cellular telephones, WSU personnel need to contact the applicable cellular telephone service provider, whether it is a WSU or personal telephone.

Single Inbox Messaging WSU personnel on the Pullman, Vancouver, and Spokane campuses have access to Single Inbox Messaging as an option to save voice mail messages. Single Inbox Messaging allows users to receive voice mail messages as .WAV file attachments to their Outlook/Exchange email inbox. **IMPORTANT:** It is necessary for the user to save the .WAV files to a permanent digital storage location to avoid losing the attachments if and when they delete the email messages.

Single Inbox Messaging is a free service that may be requested by a department budget authority using the online request system at:

servicerequest.it.wsu.edu/

Electronic Communications That May Be Deleted When No Longer Needed

As described below, many electronic communications consist of messages and attachments which may be deleted when no longer needed. (See also [Deletion of Electronic Files.](#))

Electronic communications records that have no administrative, legal, fiscal, or archival retention requirements may be deleted as soon as the messages have served their purpose. (See various transitory records series in the *BPPM* 90.01 Administrative--General Office Operations table.)

Such transitory records include:

- Informational notifications and communications of, as well as requests for, basic or routine short-term information.
- Copies of University-generated forms and publications, provided that the University retains the primary record in accordance with the current approved minimum retention period.
- Notes generated as part of brainstorming/collaborative processes.
- Preliminary drafts, edits, notes, comments, and communications related to the preparation of University documents and correspondence, unless a retention period is otherwise specified on an applicable records retention schedule.
- Scheduling, confirmations, notices, and administrative arrangements for appointments and meetings.

Retention of Electronic Communications

Electronic Communications That May Be Deleted (cont.)

- Copies of memoranda, bulletins, or directives of a general information and noncontinuing nature.
- Contact details and lists of external clients and stakeholders.
- Electronic documents used to create signed paper records.
- Internet browsing (e.g., history, saved passwords, cache/temporary files, cookies).
- Individual members' copies and notes regarding participation in internal or external committees, provided that the committee's records are retained by the responsible secretary, agency, or member.
- Logs, lists, and other documents relating to the assigning, prioritizing, tracking, monitoring, and status of work and projects in progress.
- Reference materials gathered from outside sources which are not evidence of University business transactions.
- Secondary (duplicate) copies of records created or received, provided that the University retains the primary copy of the record in accordance with the current approved minimum retention period.

Electronic Communications To Be Retained

Electronic communications and attachments that contain record material must be retained in conformance with the applicable retention schedule (*BPPM 90.01*).

The following types of electronic communications messages and attachments are likely to include records with specified retention periods:

- Electronic communications that authorize some official action, transaction, or effort.
- Electronic communications that support or explain a business transaction.
- Documents that complete a business transaction.
- Final reports or recommendations.
- Documents relating to audit or legal issues.
- Electronic communications in support of student class activity, e.g., assignments, class participation.
- Official correspondence that does not fit in another records series.

Retention of Electronic Communications

DELETION OF ELECTRONIC FILES

To completely delete any type of electronic file, the record holder must:

- Move the file to a trash folder; **and**
- Empty the trash folder.

NOTE: Files are not deleted from e-mail or voicemail systems or from computers or mobile devices until the applicable trash folders are emptied.

PRIMARY RECORD HOLDER

It is important to determine who holds the primary record of a document for retention purposes. Reference or informational copies may be deleted when no longer required by the record holder (see [Electronic Communications That May Be Deleted When No Longer Needed](#)).

The retention schedule usually identifies the office responsible for retaining the official record copy. If the retention schedule does not provide sufficient guidance, refer to the following:

- Ask how would this record be handled if it were a hard-copy transaction or letter. In such cases, the recipient is responsible for retaining the record copy.
- If an electronic communication is sent to a large number of recipients, the sender is responsible for retention of the electronic communication as well as the distribution list.

A draft of a policy is sent to a number of reviewers. The initiator of the draft is responsible for retaining the record copy.

An agenda or meeting minutes are sent to a number of attendees. The sender is responsible for retaining the record copy.

MANAGEMENT OF ELECTRONIC COMMUNICATION RECORDS

University departments and personnel may use one or more of the following methods to assure appropriate management of records with assigned retention periods.

Retain in Electronic Communication Application Format

Retain the message in the original electronic communication application format on the record holder's hard drive; removable digital media; an external storage service or device, or in a folder in the record holder's University email account. NOTE: The individual record holder must transfer records to the department that are retained in their University email account, prior to departure from the department or University.

Retention of Electronic Communications

Retain in Electronic Communication Application Format (cont.)

The original electronic communication application format is likely to capture and preserve all relevant metadata and attachments related to the record. Metadata is defined as data about data and may describe the content, time, date, author, and formatting of a message. Metadata may be used to aid in the storage, indexing, and retrieving of electronic records for public use.

NOTE: Printing and retaining a paper copy of an electronic communication is not a substitute for the electronic version, in accordance with *WAC* 434-662-040.

To facilitate retrieval, retention, and eventual disposal, the record holder could establish separate folders. Each folder could correspond to a specific scheduled records series. Electronic communications folders should be coordinated with any paper or other electronic filing systems that are in place.

Retain in Document Management System

Electronic communication messages may be retained in a document management system (DMS) or records management application (RMS). Such systems offer sophisticated control of electronic records, allowing integration of electronic communication messages within the total document environment of an organization. Such software offers single point access to a variety of formats, thus preserving the functionality of documents.

NOTE: The DMS or RMS software must have the capability of capturing and preserving all relevant metadata and attachments related to the records.

Technology Changes

Many electronic communication messages must be retained longer than the original technology that was used to send, receive, or store them. Departments are responsible for ensuring that older electronic communication messages are migrated to newer technology.

RETENTION OF IMAGED COMMUNICATIONS

Departments may scan paper communications and then retain only the imaged copies **as long as** the imaging system (e.g., scanner) produces images that meet the state imaging quality minimum requirements. See *BPPM* 90.21.

PRIVACY

Employees are encouraged to review the privacy provisions of *EP4*, Electronic Communications Policy.