



Administrative Policy

# EMAIL BUSINESS LIFECYCLE POLICY

A.P. No.

8-10

Effective Date:

Upon Approval

## 1. POLICY STATEMENT

Email maintenance will conform to the Texas State Library and Archives Commission (TSLAC) requirements, Title 6, Subtitle C, Texas Local Government Code (Local Government Records Act), Texas Administrative Code, Title 13, Chapter 7 (Local Records); and Administration and Regulatory Affairs (ARA) and Legal Department (Legal) policies.

## 2. PURPOSE

This policy establishes the standard for the City of Houston (City) email lifecycle managed by Houston Information Technology Services (HITS), including the maintenance, preservation, retention, and destruction of City email.

## 3. SCOPE

This policy applies to all City departments governed by TSLAC requirements, except the Houston Police Department.

## 4. POLICY DETAILS

### 4.1 Retention Groups

4.1.1 Email will be retained for City email users according to group membership in the following categories:

4.1.1.1 Regulated Users: Users specifically defined by ARA and the Human Resources Department based on job responsibilities and email content processed relating to those duties. These are normally decision makers or their assistants with oversight of contracts, policy, grant requests, or other legally sensitive matters.

4.1.1.2 Non-Regulated Users: The majority of the City email users involved in routine daily activities.

4.1.1.3 Hold: A stipulation (also known as "preservation notice," "legal hold," or "litigation hold") requiring the preservation of all data that may relate to a legal matter involving the City, or for matters such as public information requests, audits, or investigations.

### 4.2 Retention Schedule

4.2.1 Email will be automatically assigned retention periods subject to retention schedules according to their content, as defined by the TSLAC (see TSLAC, "Local Schedule GR: Retention Schedule for Records Common to All Local Governments" for guidelines on record retention requirements).

4.2.1.1 There are several different categories of information that must be retained for periods beyond two (2) years. Depending on the email, the periods vary from two (2) years to permanent.

Approved:

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Date Approved:

10/12/2015

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- 4.2.1.2 Regulated user email will have a two-year retention schedule — subject to keyword culling/searching as provided by ARA and TSLAC for placement into five-year, ten-year, and permanent retention schedules.
- 4.2.1.3 Non-regulated user email has a two-year retention schedule.
- 4.2.1.4 The current archival and retention solution maintained by HITS went into service July 20, 2013. This email data created prior to July 20, 2013 has a four-year retention period.
- 4.2.1.5 Email subject to a hold issued or requested by Legal will be maintained until Legal releases the hold. All other emails subject to a hold will be maintained until the appropriate department director releases the hold. Email released from a hold will then be maintained according to the applicable retention schedule for its retention group.

### 4.3 Email Storage

- 4.3.1 Email will be stored in the City's email archival solution for the retention period listed in Section 4.2.1.

### 4.4 Destruction of Eligible Email

- 4.4.1 Retention periods are set in the City's email archival solution based on content, as defined by TSLAC.
- 4.4.2 When emails meet their retention requirement, the emails are automatically classified as ready for destruction.
- 4.4.3 HITS shall carry out email destruction on the sixth (6th) business day of the month for all emails reaching the retention period end date which have not been placed on a hold.
- 4.4.4 HITS shall forward all images of email destruction logs or other documentation of destruction to Records Management Division of ARA for retention.

### 4.5 Email Subject to a Hold

- 4.5.1 Email subject to a hold will be flagged as not eligible for destruction until the hold is removed. During such time, no email subject to a hold will be deleted. When removed from hold status, email is then returned to its previous retention schedule and any pending actions will be executed.

## 5. RESPONSIBILITIES

- 5.1 The ARA Director, as the Records Management Officer for the City, is responsible for City-wide files management and the direction and control of the City's records disposition program, which includes the destruction of records. The Records Management Officer delegates authority for the destruction of email in the City's archival solution to the Chief Information Officer (CIO) in accordance with the applicable records control schedules.
- 5.2 HITS is responsible for maintenance of the City's email lifecycle and associated hardware. The CIO is the final authority for the destruction of records within the archival solution, subject to applicable holds. HITS is responsible for extraction of email subject to a hold from the archival solution. The Office of Inspector General (OIG) and other authorized City personnel may extract email in accordance with applicable policies and procedures.

5.3 Legal or the appropriate department director shall notify HITS promptly in writing if any email should be excluded from the monthly destruction process, and provide details as to the exact data, information, or email that should be placed on hold (e.g., legal, investigative, operational). Legal or the appropriate department director shall notify HITS promptly in writing when the hold on information can be removed.

**6. POLICY SPONSOR**

**Department:** Administration and Regulatory Affairs Department.