



# UW-Madison Record Management

UW- Madison Archives & Records Management

2014

## UW- Madison Employee Guidance to Electronic Business Communication and University Records *(E-mail, Chat and Text)*

### Questions:

#### Contact:

University Records Officer

[recmgmt@library.wisc.edu](mailto:recmgmt@library.wisc.edu)

Voice: 608-262-3284



## **Contents:**

- **Records Management and Electronic Communications – Overview.**
- **Are Electronic Communications Records?**
- **Some Considerations for Using E-mail for the Transaction of Official Business.**
- **What is E-Mail?**
- **Who is Responsible for Managing E-mail Records?**
- **Organizing E-mail Records.**
- **So ...How long do you need to save E-mail? (Retention)**
- **Why shouldn't I Just Keep Everything?**
- **Just a Note about Back-ups of E-mail.**
- **Public Records Requests for E-mail and other Electronic Communications**
- **Summary.**
- **Other Campus Resources and Outside Resources.**

***Diagram 1: University E-mail Record Decision Tree***

***Appendix 1: Email Management Options - Advantages and Disadvantages***

***Appendix 2: Examples for Folder Labeling and Organization***

***Appendix 3: Tips for Management of Email Records***

***Appendix 4: University Voice Mail Retention Policy***

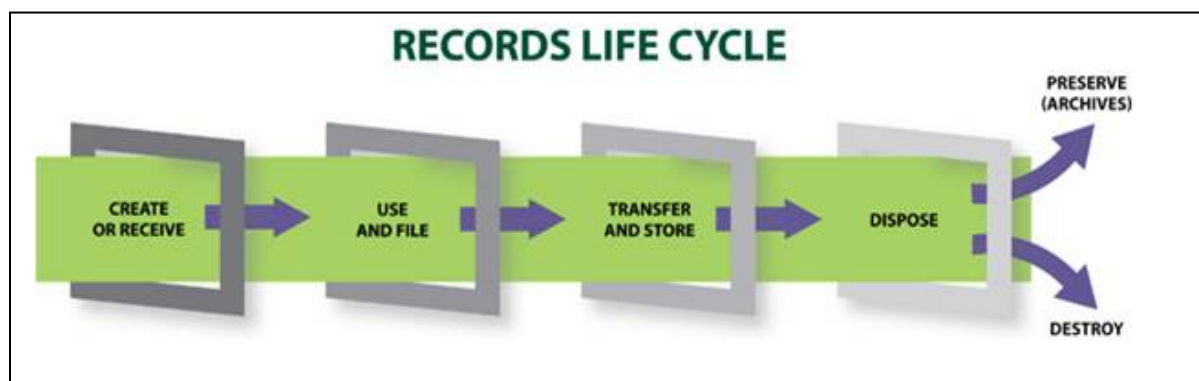
***Appendix 5: Wisconsin Administrative Rule 12 for Electronic Records***

## Records Management and Electronic Communications – Overview

**Records Management** is the systematic control and management of records in all formats and media through the records lifecycle.

Records are found in electronic communications such as electronic mail (e-mail), chat transcripts, voicemail files, and text messages. Communications of this sort can be very casual in nature. Because of this casual nature, these records are potential targets for FOIA/Open Records Requests and litigation holds. Electronic communications, just as paper records, should be managed through their entire records lifecycle in accordance to State and University policies.

As a University employee you should consider why you are creating a message, and whether it needs to be created. In other words are you using the best tool to communicate with? Would a meeting or phone call be a better use of resources?



Think about the Generally Accepted Recordkeeping Principle's® when managing electronic business communications. The 8 Principles are: Accountability, Integrity, Protection, Compliance, Availability, Retention, Disposition, and Transparency.

### Are Business Electronic Communications Records?

***Possibly, electronic communications are considered business records if they are needed to substantiate your work at the University.***

Electronic communications such as e-mail may be records and also fall under the definition of record under:

- Wisconsin Statute 16.61 ***Records of state offices and other Public Records*** or
- Wisconsin Statute 19.32(2) ***Wisconsin Open Records Law***.

Public records include all materials, regardless of physical form or characteristics, made or received by any state agency in connection with the transaction of public business.

Electronic Communications are preserved or are appropriate for preservation as evidence of University functions, policies, decisions, procedures, operations, or other activities of the University, or because of information value and content of the data they contain.

ISO 15489 defines records as defines **records** as "information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business"

**Some examples of official records:**

- Policies and directives
- Correspondence related to official business
- Work schedules
- Meeting agendas and minutes
- Any document that initiates, authorizes or completes a business transaction
- Reports
- Tenure documentation
- Admission documentation
- Search and Screen documentation

***Are Instant Messages (Chat) or Text Considered Records?***

**Possibly, in certain circumstances these messages are similar to email and may constitute a record.** *It may be necessary to transcribe or capture the message in another format.*

*For purposes of this bulletin, we will concentrate on email as records, but the same principles also apply to both IM and Text messages. The university voice mail retention policy can be found on Appendix 4.*

---

**What is E-Mail?**

Electronic messaging (e-mail) is a method of delivering and receiving electronic mail. Just as you receive physical mail in your mailbox at home, electronic messages that you received in your university email box may be considered records.

E-mail message include the following elements:

- Textual message (this is the main message)
- Metadata (To, From, Subject, Date, Time, System, etc.)
- Attachments

These 3 elements together (Textual message, Metadata, and Attachments) *may* comprise a record.

## Some Considerations for Using E-mail for the Transaction of Official Business

1. **Before creating** an e-mail, consider if this method is the correct communication tool for the task. Is e-mail the right tool to use? If the subject of the transaction is sensitive or confidential, a phone call or a face to face discussion may prove to be a better vehicle for the transaction.
2. **Don't use e-mail to send or transmit confidential or sensitive information.**
  - UW- Madison Sensitive Information Definition can be found on the CIO Policy Website: <http://www.cio.wisc.edu/SensitiveDataDefinition.pdf>
  - UW-Madison Policy for Storage and Encryption of Sensitive Information on the CIO Policy Website: <http://www.cio.wisc.edu/IEncryptPolicy.pdf>
3. Use a professional tone and language in creating the message.
4. **Don't** create an email that you wouldn't want to be read by the public.
5. E-mail **may not** be used as a substitute for an open meeting.

*More e-mail tips can be found on Appendix 3 at the end of this bulletin.*

## Who is Responsible for Managing E-mail Records?

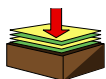
Users are responsible for management of their email messages. Good management means organizing messages and disposing of them properly according to the university records policies.

Categorizing and organizing e-mail so that it is accessible at a later date is a challenge. As the volume of email increases, so does the difficulty of this task. **Simply leaving incoming messages in an "in-box" and outgoing messages in a "Sent Item" folder is inefficient.** In addition, many systems are set up to automatically delete messages from these folders after a set period of time. Key messages left in these folders could be deleted without your input or knowledge.

**It is recommended that you manage both your in and out boxes messages.** The reason for this recommendation is that both sender and recipient of email messages have the responsibility to document their activities and those of the University. Both the sender and the recipient have to determine whether a particular email message is a necessary part of that documentation.

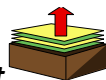
## Organization of E-mail Records

An e-mail inbox is like an inbox on a desk,



*What comes in . . .*

*. . . Should always go out*



*(Either delete or placed into a folder.)*

**Think about your computer and e-mail application like a correspondence file in a filing cabinet.**

Start with setting up a standardized filing scheme (labels, arrangement, and order) to store your messages so that you can efficiently retrieve documents to use the information to make decisions. Think about how you need to access and retrieve the information. Naming your electronic files with consistent naming schemes is important to be able to access and retrieve information in a timely way to answer requests or take action as a part of daily workflow.

One suggestion in creating file folders is to utilize the records schedules whereby the deletion or long-term storage of email messages follows the records retention policies of paper correspondence and files.

Once a folder structure has been chosen it should be used and applied consistently for easy access, retrieval and queries for information.

**Advantages and Disadvantages in management of e-mail can be found on Appendix 1.**

### **So ...How Long Do You Need to Save E-mail? (Retention)**

E-mail management is user driven, so it is up to the user to manage e-mail appropriately and according to university policies.

The key to management of e-mail is to delete non-records and manage any Routine or Transitory records per the General Retention Schedule for Business Communications.

***(Refer to Diagram 1: University E-mail Record Decision Tree)***

#### **NON-RECORDS:**

***If e-mail is considered a Non-Record, delete the e-mail outright.***

Just as you would sort through your mail at home, you would throw away advertisements but you would keep the bills.

**The following are not considered records, under Wis. Stats. §§ 16.61 and 19.35:**

- **Duplicates.** Duplicates records are maintained by a University employee only for convenience or reference and for no other substantive purpose.
- **Unsolicited Notices or Invitations.** Unsolicited notices or invitations received by a University employee, which are not related to any official action taken, proposed, or considered by the University of Wisconsin -Madison.
- **Drafts, Notes, and Preliminary Computations.**
- **Routing Slips and Envelopes.**

**UTILIZE THE BUSINESS COMMUNICATIONS GENERAL RETENTION SCHEDULE FOR ELECTRONIC COMMUNICATIONS.**

*The UW-System Business Communication General Records Schedule addresses the use and retention of e-mail, and chat records. See Diagram 1.*

The following is taken from the **General Retention Schedule for Business Communications**. Add <http://archives.library.wisc.edu/records/rda.html#general-records>

**1. Transitory E-mail: RDA#UWBC0002**

**Transitory communication is directly connected to the transaction of public business that is conducted by university employees, but it has a short-term business value.** Transitory communication has no business value after the information contained in the message has been conveyed or superseded, or the event to which the message is related has occurred. Transitory communication does not establish policies, guidelines, or procedures; certify a transaction; become a receipt; nor perpetuate or formalize business activities of the University of Wisconsin System. Transitory communication is not necessary for statutory, legal, or fiscal purposes; has no historical value; would not be filed in a records management system; and should be destroyed after one week, or when obsolete because the communication has been superseded or the related event has transpired.

**Retention Period: Retain for 7 days or destroy when obsolete because the communication has been superseded or the related event has transpired.**

**2. Routine E-mail: RDA #UWBC0001**

**Routine communication comprises the normal communication that occurs when university employees, and sometimes their colleagues who are not university employees, work together to transact public business on behalf of the University of Wisconsin.** Routine communication has no historical value; never includes records that set forth university policies, guidelines, procedures, or directives; and does not formalize the business processes of the University of Wisconsin.

**Retention Period: Retain for 6 months after a business activity or project is completed.**

**3. E-mail which is not declared as a business record is Transitory or Routine and that demonstrates a university transaction or a university action has retention applied based on the content of the e-mail.** Utilize the appropriate university records retention schedule to manage this group of e-mail records.

Refer to the General Retention Schedules on the University Records Management Website. Search “Records Schedules” on the main UW-Madison webpage to locate.

***Examples that fall under this group of records might include:***

- Records that document the formulation and execution of basic policies and decisions and the taking of necessary actions.
- Records that document important meetings like a departmental or staff meeting.
- Records that facilitate action by agency officials and their successors.
- Records that protect the financial, legal, and other rights of the University and of persons directly affected by the University’s actions.

## **Why shouldn’t I Just Keep Everything?**

**Retaining all e-mail is not good records management practice.** University Employees are responsible for good records management practices for all records that they create, which include e-mail. Disposition and Retention play an important role in management of our university records. **There needs to be a Commitment to the Records Retention Process:**

- a) Executing the Record Retention Policy for e-mail records in the normal course of business supports the E-Discovery process and Open Records Request process. **This leads to fewer records to produce.**

***NOTE: If you haven’t deleted email records in accordance to the schedule, you are required to produce the email for an open records request, litigation or audit which may have associated consequences for not following the records retention policy.***

- b) **Keeping everything is expensive.** Following the Record Retention Policy frees up server space reducing risk and the cost for storage of email records.
- c) Following the Record Retention Policy reduces searching and retrieval times and eliminates risk of lost or misfiles. **Less email to manage and keep track of.**

***There should be good, well-considered reasons why your office would retain records past their final disposition date.***

### **Just a Note about Back-ups of E-mail....**

Back-ups of e-mail systems are for business continuity or disaster recovery only and are not kept for record keeping purposes. Your IT departments should be physically expunge/purging backup media, and this should happen in compliance with a routine schedule. Backup Medias are designed to recover a system in the event of a catastrophe or incident that renders data irretrievable, and when a new backup is run, the earlier ones should be overwritten, destroyed or otherwise rendered unusable.

## **Public Records Requests for Email and other Electronic Communications**

- If you receive an open records request for records contained in your e-mail system, you are obligated to respond to it in the same fashion that you would a request for paper records.  
***Please contact Office of Legal Affairs if you receive a request for records.***
- For more information regarding Public Records, please visit the *Office of Legal Affairs* at:  
<http://legal.wisc.edu/public-records.htm>

### **In Summary:**

Electronic communications such as E-mail, Chat and Text are extremely useful tools: They are quick, easy to use, and provide us with an instant record of a transaction which a telephone conversation or face-to-face meeting does not provide.

You should continue to use electronic communications such as email for a wide range of transactions, including:

- sending small documents, or links to documents, to recipients instead of paper copies through the mail
- sending information

- requesting information
- arranging appointments and meetings through the calendar option

However the following issues are vital and you should always bear them in mind:

- you should be very careful about sending personal or sensitive information by e-mail;
- be careful about the way you write e-mails, always be courteous and write in a business tone;
- E-mails are the considered records of the university and may be liable to disclosure under Wisconsin Open Records laws or subject to litigation.

## **Other Campus Resources**

**University of Wisconsin Archives and Records Management website:**

<http://archives.library.wisc.edu/>

**UW-Madison Records Retention Schedules:**

<http://archives.library.wisc.edu/records/rda.html#general-records>

**UW-System Business Communications General Retention Schedule Tutorial:**

<http://www.uwex.uwc.edu/admin-services/audit/businessComm>

**University of Wisconsin-Madison CIO Policy's - Appropriate Use:**

<http://www.cio.wisc.edu/policies-appropriateuse.aspx>

**University of Wisconsin-Madison CIO Office of Information Security: "What are Received lines of an email? Preferred way to print email to capture received metadata for evidence.**

[http://www.cio.wisc.edu/security-report-received\\_lines.aspx](http://www.cio.wisc.edu/security-report-received_lines.aspx)

**University of Wisconsin – Madison CIO policy on Email Servers**

<http://www.cio.wisc.edu/policies-email.aspx>

**Office of Administrative Legal Services at:** <http://legal.wisc.edu/public-records.htm>

## **Outside Resources:**

***How to stop e-mail overload? Think before you hit send.*** By Chris Anderson,  
Published: September 23, 2011 [http://www.washingtonpost.com/opinions/how-to-stop-e-mail-overload-think-before-you-hit-send/2011/09/09/gIQATMBorK\\_story.html](http://www.washingtonpost.com/opinions/how-to-stop-e-mail-overload-think-before-you-hit-send/2011/09/09/gIQATMBorK_story.html)

***Email Charter: 10 Rules to Reverse the -Email Spiral. Publishes: December 5, 2011***

<http://emailcharter.org/index.html>

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

**Association for Information and Image Management (AIIM)** <http://www.aiim.org/What-is-Email-Management-EMM>

**About ARMA International and the Generally Accepted Recordkeeping Principles®**

ARMA International ([www.arma.org](http://www.arma.org)) is a not-for-profit professional association and the authority on information governance. Formed in 1955, ARMA International is the oldest and largest association for the information management profession with a current international membership of more than 10,000. It provides education, publications, and information on the efficient maintenance, retrieval, and preservation of vital information created in public and private organizations in all sectors of the economy. It also publishes Information Management magazine, and the Generally Accepted Recordkeeping Principles®. More information about the Principles can be found at [www.arma.org/principles](http://www.arma.org/principles).

**See Diagram 1 and Appendixes 1-5 on the following pages:**

- ***Diagram 1: University E-mail Record Decision Tree***
- ***Appendix 1: Email Management Options***
- ***Appendix 2: Examples for Folder Labeling and Organization***
- ***Appendix 3: Tips for Management of E-mail Records***
- ***Appendix 4: University Voice Mail Retention Policy***
- ***Appendix 5: Wisconsin Administrative Rule 12 for Electronic Records***

## University E-mail Record Decision Tree

\*SEE UWS GRS Business Communication Schedule

Content Determines the Value

CONTENT of Received or  
Created e-mail

Is the e-mail  
**Non-Records**  
duplicate copy, or  
spam? Cc, Bcc  
emails recieved

Yes

Wisconsin State Statue  
16.61(2)(b) says it is **not**  
a record. **Delete it!**

No

Is the e-mail  
**Transitory**?

Yes

**Retention Schedule\*:**  
**Keep 7 days or until**  
**superseded or event**  
**has expired.**  
**Delete it!**

**Transitory** = Business-related messages of minimal short  
term value.

It can replace in-person conversation.  
EX: Information about workplace events, Listserv, quick  
response to a request. (e.g., "What hours are you  
open?").

No

Is the e-mail  
**Routine**?

Yes

**Retention Schedule\*:**  
**Keep 6 months after**  
**event, project or**  
**activity.**  
**Delete it!**

**Routine** = Directly connected to the transaction of public  
business

Normal communication between team member working on  
a project.

No

It is a  
**University  
Record.**

See the appropriate university  
records retention schedule for  
appropriate retention and  
disposition on Website.

Governed by the appropriate records schedule according to  
what the content of the email is. Refer to the University [General Retention  
Schedules](#) on the UW-Madison Records Management Website.

Contact Records Officer

E-mail message consists of: 1. Metadata, 2. Message  
body 3. Attachments **based on content.**

## Appendix 2: Examples of Electronic Folder Labeling and Folder Organization.

*Some examples for labeling electronic folders:*

**Example 1:** the Year first, followed by the Name and the Version number. Sub folders would follow.

 2011\_ABC\_Project\_v1

- Sub team

**Example 2:** the Year, Month and Date, and Title.

 2011\_09\_01\_Board of Directors Meeting Minutes

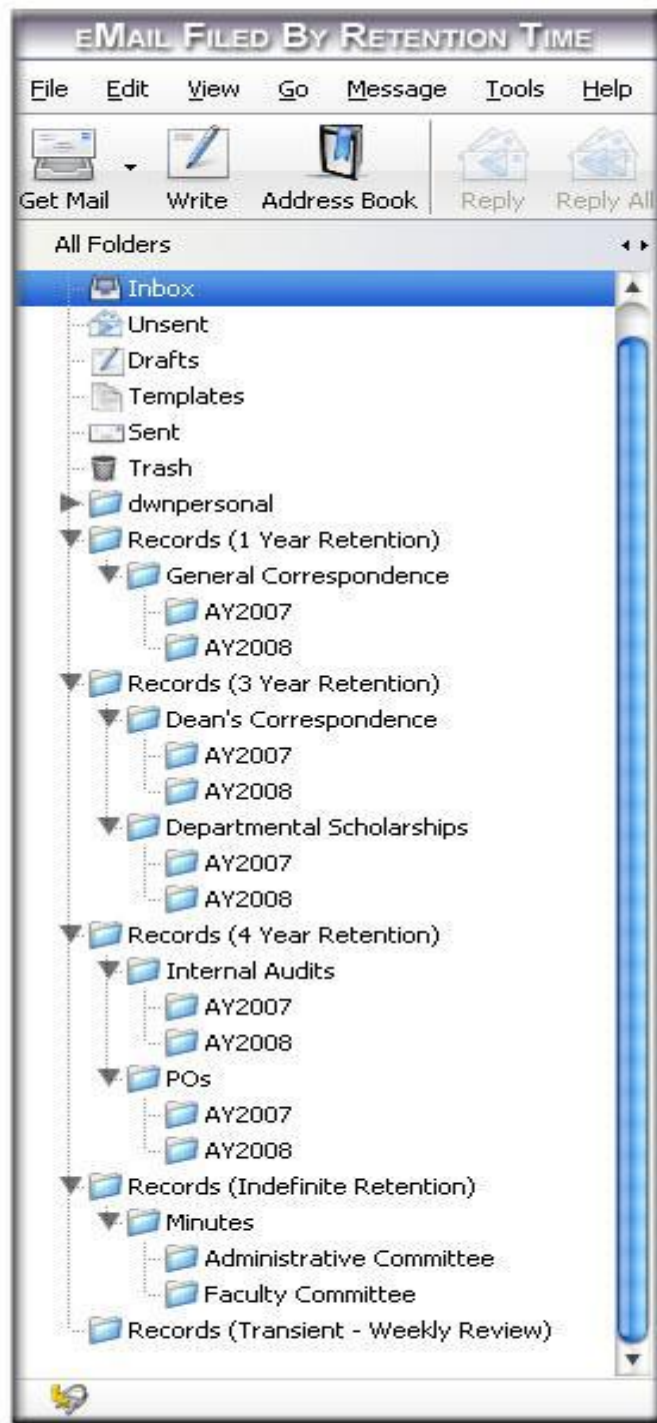
 2011\_12\_01\_Chancellor Meeting Minutes and Agenda

***The key is to keep labeling consistent.***

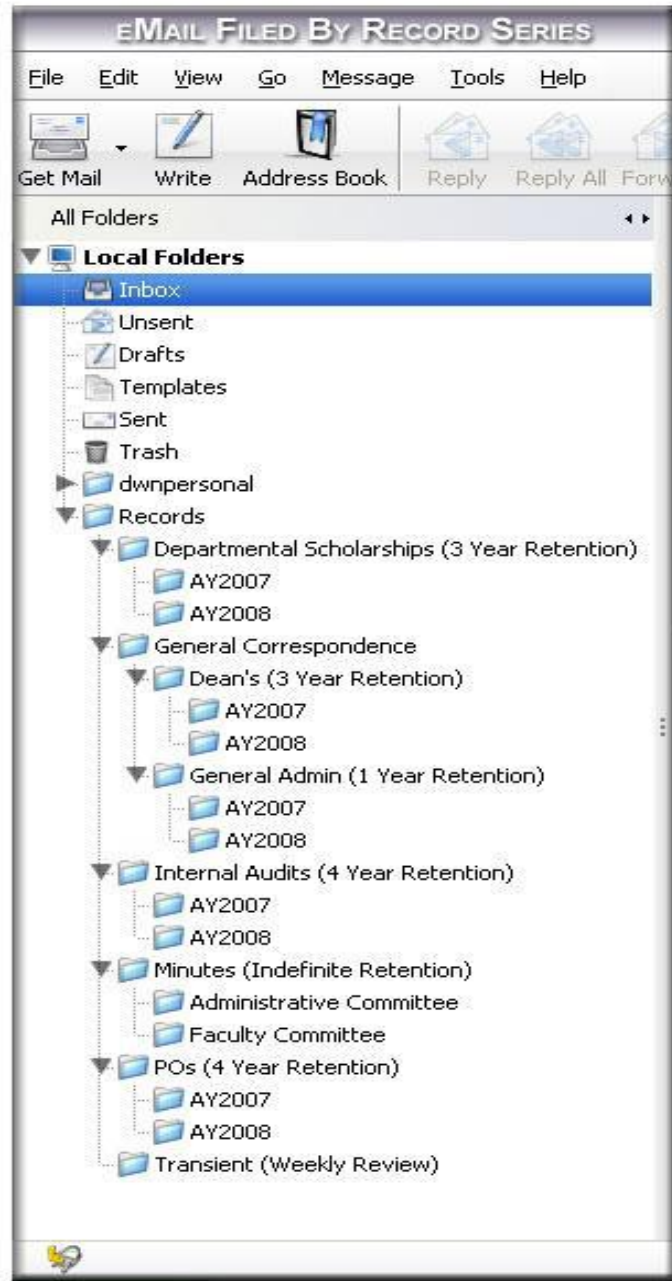
## Examples for how to organize folders in email.

(Retention time stated in this appendix is for demonstration purposes only, refer to the University Retention Schedules:  
<http://archives.library.wisc.edu:2784/records/rda.html#general-records>)

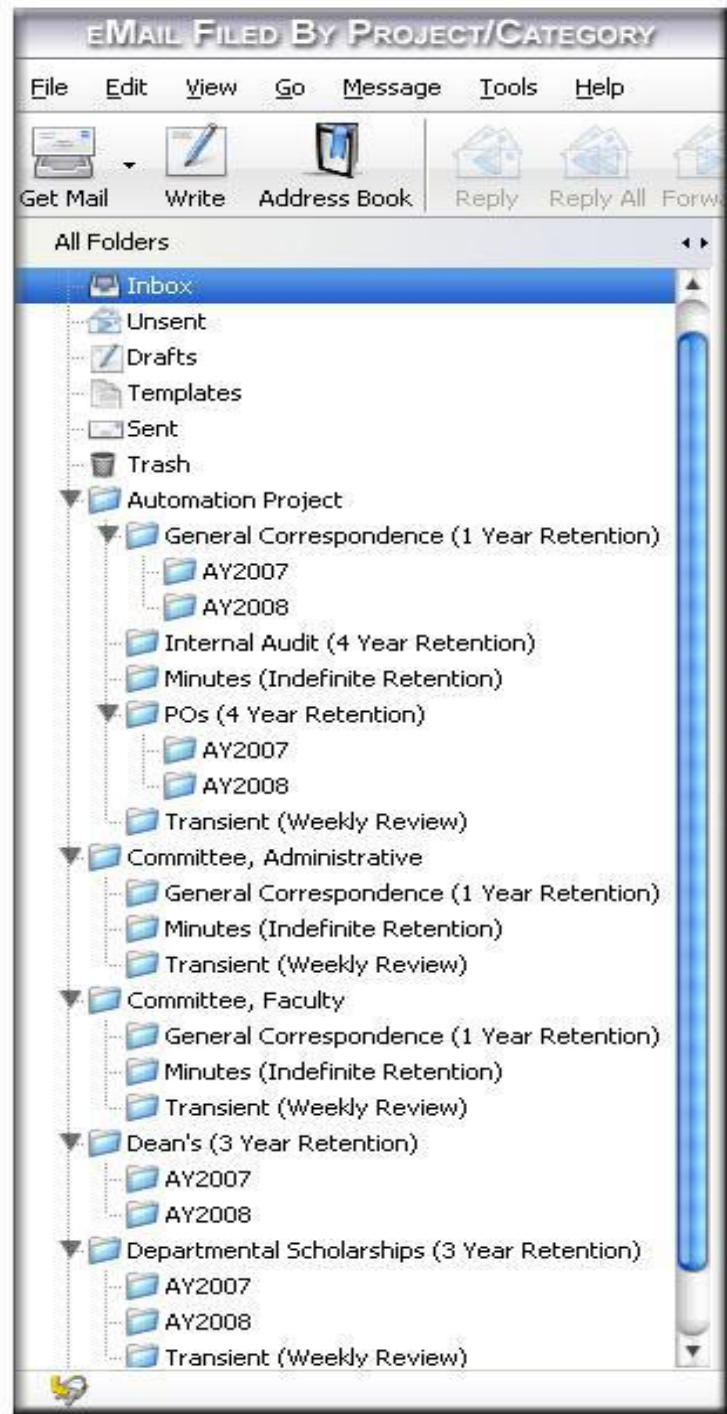
### By Retention Time



## ***By Record Series***



## ***By Project/Subject Category***



Examples of file structures courtesy of Ohio State University Archives & Records Management  
<http://library.osu.edu/sites/archives/retention/email.php>

## Appendix 3: E-mail Tips

**So now that you are organized, here are other suggested e-mail tips to keep in mind.....**

**1. Be mindful that e-mail is a communications tool and not a collaborations tool.**

Don't let email prevent you from brainstorming and meeting with your colleagues face to face. Try not to send an e-mail if a conversation is a more appropriate way to respond to a colleague; most people only skim long e-mails and are likely to miss the important information you want to share.

**2. Do not use the "Reply All" as a default.**

Using the "Reply All" creates duplication and copies within the e-mail system which need to be managed. Use this only when needed to communicate to a group for a project etc.

**3. Avoid using the BCC function.**

Using the "BCC" creates duplication and copies the same way as the "Reply All" within the e-mail system which creates more messages that need to be managed.

**4. Talk about One Subject per Email Message.**

Categorizing and managing e-mail is much more straightforward when we manage the **subject lines** consistently. Simplistic subject lines like *Hi!* are often treated as SPAM or a potential virus threat. Try to keep one subject per message. This makes it easier to sort, file and review.

For example: "Acme Corp. Contract Negotiations" or "Human Resources Policy Draft"

For another subject, start a new e-mail, if the subject/topic changes then change the subject line to reflect the message.

**5. Tag e-mails containing Personally Identifiable Information (PII) or confidential information in the subject line.**

**6. Don't Use Your Inbox as a Catchall**

- Try to "touch" each e-mail only once.
- **Instead: Act on it, Refer it to someone else, Delete it, or File it.** File important e-mails so that they are accessible to other people eg: on a server or shared drive.

- 7. Use a standardized naming and classification schema for all files.**  
Create folder structures that enable old messages to be grouped and archived. By organizing your e-mail you are in the position to respond to requests for information, utilize information for future decision making and save costs in time searching for information.
- 8. Delete messages that are not records when no longer needed according to the Records Policy for Business Communications. (GRS Business Communications)**
- 9. Remove Yourself From Mail Lists If You Don't Value the Information.**
- 10. Send Links Instead of including Large Attachments in messages.**  
Use shared drives, servers or websites rather than sending an attachment.
- 11. Use Automated Vacation Messages to Set Sender Expectations.**
- 12. Remember that e-mail is not a secure form of communication. Never send personally identifiable information in an e-mail message that is not encrypted.**
- 13. Remember that all your e-mails are subject to the open records law and are open to scrutiny and public review.**

## **Appendix 4:**

### **UW-Madison Voicemail Retention Policy**

UW-Madison voice mail messages will be saved in the AVST voice mail system for **30 days from the time of delivery**, unless intentionally deleted.

When the 30 day period is up, the system will delete the message whether or not it has been listened to and whether or not it has been saved (either using the telephone or Web PhoneManager).

Once a message is deleted, either by the user before the 30 day period is up or automatically by the voice mail system at the 30 day point in time, the message cannot be retrieved.

Voice mail messages can be saved for longer periods of time by downloading as a .wav audio format file attached to an email message or directly to a computer.

**Voice mail messages delivered as a file attachment in email are considered an email message and follow the retention policy of your email system. Please check with your email system administrator for that policy. All recorded messages are subject to open records laws.**

[http://www.doit.wisc.edu/telephone/voice\\_mail/vmpolicy.aspx](http://www.doit.wisc.edu/telephone/voice_mail/vmpolicy.aspx)

## Appendix 5:

### **State Guidance: Wisconsin Administrative Rule 12 – ELECTRONIC RECORDS MANAGEMENT– STANDARDS AND REQUIREMENTS**

Administrative Rule 12 stipulates that if your department maintains any of its official records in *electronic format only*, then certain requirements must be met to insure that electronic records are retrievable, accessible, reproducible, etc. throughout their retention life.

- Must maintain accurate linkages, electronically or by other means, to transactions supporting records where these linkages are essential to the meaning of the record.
- Must be able to produce that will continue to have meaning throughout their retention life. In many instances, this will require the development and implementation of a data migration strategy. Migration means the set of organized tasks designed to achieve the periodic transfer of digital materials from one hardware/software configuration to another.
- Must have the capability to delete and purge records from a system in accordance with an approved records retention schedule.
- Must be able to accurately reproduce a record with a high degree of legibility and readability and correctly reflect the original record.
- Must insure the records authenticity. Information systems must be able to document that only authorized persons were involved in the creation, receipt, transmission, maintenance and disposition of records. This may mean that information systems may need to substantiate security and other measures to be sure the records integrity has been maintained.

<http://publicrecordsboard.wi.gov/docview.asp?docid=15970&locid=165>