

Indiana Oversight Committee on Public Records Policy 22-01
Retention, Disposition, and Archival Responsibilities for State Staff Electronic Mailboxes

Applies to:

- All State of Indiana agencies, as defined below, except those exempted in IC 5-15-5.1, in the context of specific responsibilities defined in this policy.
- Agencies exempted in IC 5-15-5.1 if mailboxes from that agency are voluntarily transferred to the Indiana Archives.
- Indiana State Personnel Department (INSPD), the Indiana Office of Technology (IOT), and the Indiana Archives and Records Administration (IARA), in the context of specific responsibilities defined in this policy.

Purpose: To ensure that email composed, sent received and stored via the State of Indiana’s electronic mail system are retained in accordance with Records Retention Schedules approved by the Oversight Committee on Public Records.

Effective Date: 05/25/2022

Authority: Indiana Code 5-15-5.1.

Definitions:

Agency means any state office, department, division, board, bureau, commission, authority, or other separate unit of state government established by the Constitution of the State of Indiana, by law, or by executive or legislative order.

Backup means the copying of data so that it can be restored should the original data be destroyed by whatever cause, including mechanical or software failure, theft, or disaster.

Disposition refers to the final destruction or transfer of materials to the Indiana Archives and Records Administration as determined by Records Retention Schedules approved by the Oversight Committee on Public Records.

Electronic mail (e-mail) means electronic mail message(s) composed by staff via a software application, each of which contains metadata about the sender and receiver, body which includes the content of the message, signature and disclaimers, and attachments.

Electronic mailbox means all emails that are tied to a single staff member’s Active Directory account with a specific agency and managed by IOT.

Staff means all persons whose access to, or use of, State of Indiana electronic mail systems is funded by the State or is available through equipment owned or leased by the State.

Records Retention Schedule means a Records Retention and Disposition Schedule approved by the Indiana Oversight Committee on Public Records.

Senior official means a position that is 1) an appointing authority under IC 4-12-1-2(c); 2) appointed and designated by the Governor (agency leaders, board members, commissioners and similar); or 3) holds policy-and/or legal decision-making responsibilities for the agency or specific divisions of the agency.

Policy:

- 1) Retention and disposition responsibilities:** When staff separates from their agency, the agency is responsible for requesting access to any electronic mailbox that must be retained in accordance with Records Retention Schedules approved by the Oversight Committee on Public Records or for the agency's own business continuity and operations purposes.
- a) Agency staff authorized to request access may include the direct supervisor or manager of the separated staff member, any supervisor or manager at a higher level, or general counsel.
 - b) Access may be granted to any agency staff at the discretion of an agency staff member authorized to request access.
 - c) IOT will provide access to the electronic mailbox in accordance with extant IOT procedures for all agency staff for whom access has been requested.
 - d) Upon receipt of the electronic mailbox, the requesting agency assumes retention and disposition responsibility for the contents of the mailbox. IOT continues backup responsibilities in accordance with extant IOT procedures.
 - e) If the requesting agency elects to retain contents of the mailbox outside the scope of extant IOT procedures, the agency:
 - i) assumes access responsibility for contents of their copy of mailbox until such time as the contents are no longer required.
 - ii) is not exempt from complying with all applicable Records Retention Schedules approved by the Oversight Committee on Public Records, specifically the scheduled transfer of records to the Archives.
 - iii) is responsible for notifying the Archives in writing when the agency disposes of the agency copy of the mailbox contents if the Archives has ingested a copy of the contents of the mailbox.
 - f) IOT will manage mailboxes in accordance with the responsibilities laid out in extant IOT procedures.
 - g) IARA will assume preservation responsibilities for mailboxes which the Archives ingests in accordance with Records Retention Schedules and policies approved by the Oversight Committee on Public Records.
 - h) IARA and IOT are responsible for providing joint records management and data protection guidance to agencies, respectively, per IC 5-15-5.1-5(a)(15).
- 2) Disposition of Senior Official electronic mailboxes:**
- a) SPD is responsible for maintaining a list of job codes for Senior Officials (Appendix A), conducting annual audits to ensure the inclusion of any new applicable job codes, and providing a copy of the list to IARA and IOT each time it is updated.
 - b) IARA and the Office of the Governor are responsible for annually reviewing and approving the list.
 - c) IOT is responsible for excluding the electronic mailboxes of any staff who appear on the list of Senior Officials from any auto-deletion cycles that IOT establishes and maintaining the electronic mailboxes until they have been ingested by the Indiana Archives; notification is received from the Indiana Archives that a mailbox is not required for their collections and is approved for destruction; or the expiration of 1,095 days.

- d) IOT may return the mailbox of staff who appear on the list of Senior Officials to standard auto-deletion cycles if:
 - i) A copy of the mailbox has been transferred to and accepted by the Indiana Archives under Record Series GRADM-3.
 - ii) IARA has notified IOT in writing that the mailbox does not fit the criteria for Record Series GRADM-3 or is not of permanent historical value and does not require transfer to the Indiana Archives.

3) Archival responsibilities:

- a) IARA is responsible for assisting in the transfer of electronic mailbox contents that fall under GRADM-3 on the General Records Retention and Disposition Schedule for All State of Indiana Administrative agencies, ingesting these records in accordance with best practices and IARA policies, preserving these records, and managing access, in accordance with IC 5-14-3 or any supplementary agreements between IARA and the requesting agency.
- b) IARA is responsible for maintaining supplementary agreements between IARA and the requesting agency.
- c) IARA is responsible for working with agencies to ingest mailboxes as appropriate under Oversight Committee on Public Records Policy 02-01 and updating IOT when ingesting the mailbox of a user whose job code appears on the list maintained by SPD.

4) Relationships with existing policies: This policy has been created within the context of the following documents.

- a) *General Records Retention and Disposition Schedule for All State of Indiana Administrative Agencies*
- b) *Indiana Office of Technology Email Retention and Recovery Responsibilities*
- c) *Indiana Oversight Committee on Public Records Policy #02-01*

APPENDIX A

Senior Official Job Codes

Job Code	Job Title
00EXAH	Agency Head
00EXAD	Assistant Director
00EXBB	Broad Band Executive
00EXBU	Business Unit Director
00EXCF	Chief Financial Officer
00EXCO	Chief Information Security Officer
00EXCS	Chief of Staff
00EXCT	Chief Technology Officer
005DK0	Colonel
00EXCD	Communications Director
00EXDT	Department Director
00EXDC	Deputy Comm/Director
00EXDG	Deputy General Counsel
00EXDO	Director of Operations
00EXDP	District Deputy Commissioner (INDOT)
00EXDD	Division Director
005HJ0	DNR Lt. Colonel
DOEEXP	DOE Exempt
00EXBM	Executive Board Member Appointed
00EXGC	General Counsel
00EXRX	HR Director
INEEXP	IN Elected Exempt
005DJ0	ISP Lt. Colonel
005DI0	ISP Major
00EAI4	IT Director
00EXLD	Legislative Director
00EFX1	Med Dir E1 Clin Svcs
00EXOD	Ombudsman Director
00EXTB	Procurement Director
00EFI1	Psychiatric Med Dir E1
00EXRM	Regional Director/Mgr
SGBEXP	SGB Exempt
005FJ0	Supt. - Gaming LE
00EXSH	Supt. - State Hospital
UTLEXP	Utility Exempt
00EXWD	Warden