

## **Electronic Communications Retention and Disposition Policy**

### **PURPOSE**

This policy provides clear guidance to employees on the management, retention, and disposition of electronic communications, including email, Microsoft Teams messages, and work-related text messages. This policy ensures consistent compliance with CEA-11 and applicable public records and legal requirements.

### **SCOPE**

This Policy applies to all board members, committee members, employees, contractors and temporary staff who use organization-issued or organization-authorized systems to conduct official CEA business including:

1. Email (Microsoft Outlook);
2. Microsoft Teams (chat and channel messages); and
3. Work-related text messages (SMS/MMS) sent or received on organization-issued or personal devices when used for official business.

### **RETENTION**

General electronic correspondence is retained for two (2) years, unless a longer retention period is required by the Records Retention Schedule, law, audit, litigation hold, or business need.

Messages that qualify as official records must be retained in accordance with the applicable retention category.

### **EMAIL**

Emails are automatically deleted from Outlook after two (2) years pursuant to Board Resolution 2026-026.

Automatic deletions occur weekly.

#### **Employee Responsibilities – Email**

Before the two-year retention period expires, employees must:

1. Review emails to determine whether they constitute an official record that requires longer retention;

2. Save required records to the appropriate approved recordkeeping system (e.g., shared drive, document management system, or project file) using an appropriate filename and folder;
3. Retain complete records, including attachments and relevant context; and
4. Ensure record emails are captured and stored outside of Outlook when retention beyond two (2) years is required.

Emails that are transitory, informational, duplicative, or not required for business or legal purposes do not need to be saved and will be deleted automatically.

### **MICROSOFT TEAMS MESSAGES**

Teams chats and channel messages are considered electronic correspondence under CEA-11 and are automatically deleted after two (2) years.

Teams messages that document decisions, direction, approvals, policies, or other substantive business activities may constitute official records.

#### **Employee Responsibilities – Teams**

Employees must:

1. Identify record-worthy content in Teams messages;
2. Export or copy the message content (including date, participants, and context) into an approved recordkeeping location if it must be retained beyond two (2) years; and
3. Not rely on Teams as the sole record repository for official records.

Routine chats, scheduling messages, and informal communication that do not document official business are considered transitory and do not need to be retained.

### **TEXT MESSAGES (SMS/MMS)**

Text messages are retained for two (2) years and destroyed after Board authorization.

Work-related text messages sent or received on organization-issued or personal devices are subject to the same retention requirements as email.

Text messages may be considered public records when they relate to official business.

#### **Employee Responsibilities – Text Messages**

Employees must:

1. Avoid using text messaging for substantive or complex official business when possible;
2. Capture and retain record-worthy text messages by forwarding, screenshotting, or exporting them to an approved recordkeeping system; and
3. Ensure accessibility of retained messages for public records requests, audits, or litigation

### **LEGAL HOLDS AND PUBLIC RECORDS REQUESTS**

When notified of a legal hold, audit, or public records request:

1. Automatic deletion processes do not apply to responsive records; and
2. Employees must immediately preserve all relevant communications and follow instructions provided by legal or administration.

### **Prohibited Practices**

Storing official records solely in personal inboxes, Teams chats, or text messages beyond their retention period is prohibited.

Deleting or altering records subject to a legal hold or records request is prohibited.

### **Compliance**

Failure to comply with this policy may result in disciplinary action and may expose the organization to legal or regulatory risk.

### **Questions**

Questions regarding records retention or proper storage of electronic communications should be directed to the Board Clerk and General Counsel.