

General Personnel

Administrative Procedure - Email Retention

Emails, including attachments, sent or received by the Cooperative or Cooperative employees may be, depending on their content, subject to disclosure under the Freedom of Information Act and/or discovery in litigation as evidence in support of a claim. Employees must use the same standards of judgment, propriety, and ethics with email as they do with other forms of school business-related communications.

Accordingly, employees have the same responsibilities for email messages as they do for any other communication and must distinguish between record and non-record messages. This allows for the proper storage or disposal of email. However, no Cooperative record, no matter its form, may be destroyed if it is subject to a litigation hold. See administrative procedure 2:250-AP2, *Protocols for Record Preservation and Development of Retention Schedules*. For guidance on Board member use and retention of email, see 2:140-E, *Guidance for Board Member Communications, Including Email Use*. For help with these responsibilities, please contact the Cooperative's FOIA Officer.

Non-Record Messages

Email messages are *non-record messages* if they do not evidence the Cooperative's organization, function, policies, procedures, or activities; or contain informational data appropriate for preservation. These are generally informal or preliminary drafts, notes, recommendations, or memoranda that do not contain official action. Examples include:

1. Personal correspondence not received or created in the course of Cooperative or school business, such as, "What's for dinner?" or "I'll be glad to drive to the meeting."
2. Duplicates of notices concerning meetings or workshops, dates, discussion topics, or material to prepare for or to be discussed during a meeting.
3. Publications or promotional material from vendors and similar materials that are sent as part of mass marketing campaigns.
4. Correspondence containing recommendations or opinions that are preliminary to a decision, unless appropriate for preservation, e.g., legal opinions.
5. Informal correspondence to parents/guardians concerning school activities or an individual student's progress or assignments provided the messages do not contain notice of final or official action.
6. Draft material, except when appropriate for preservation, e.g., draft collective bargaining agreement language.

If the email is a *non-record message*, the employee should delete it as soon as its purpose is fulfilled unless the email is subject to a litigation hold. The goal is to control excessive accumulation of material.

Official Record Messages

Email messages are *official record messages* if they are evidence of the Cooperative's organization, function, policies, procedures, or activities or contain informational data appropriate for preservation. Some examples include:

1. Policy documents or contract-related documents.
2. Correspondence, e.g., letters, memos, or emails from individuals, companies, or organizations requesting information about the Cooperative or school policies or practices and the responses to these requests.
3. Project reports.

4. Correspondence dealing with significant aspects of Cooperative administration or a school executive office, including messages containing information concerning policies, programs, fiscal and personnel matters, and contracts.
5. Correspondence between Board members regarding Cooperative business.
6. Updates provided to a student's parent/guardian about the student's progress or a disciplinary matter.
7. Correspondence between administrators regarding an employee investigation.

All messages are kept in the records maintenance location identified by the Records Custodian or Head of Information Technology (IT).

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