Assigning Role-Based Retentions in M365

Scope

Included: All emails and Teams messages created or received by current employees.

Excluded: M365 records outside of email or Teams messages (OneDrive, Teams Posts or Files, etc.). Emails and Teams messages from separated (former) employees. Legacy shared mailboxes that are not licensed.

Roles and Responsibilities

Records Officer: Coordinate with programs for retention analysis. Create and maintain agency's Master Retention List. Communicate with agency stakeholders.

Program Subject Matter Experts [Records Coordinators and/or other knowledgeable staff]: Provide specific information about business practices and records produced by each program. Pass information back to Records Officer.

Program Managers/Administrators: Help identify Program Subject Matter Experts and support their participation in this process. If needed, support recordkeeping process improvements for emails and Team messages better stored in other systems.

State Archives Records Management Unit: Provide guidance on analytical process. Coordinate with DAS EIS to activate policies after agency analysis is complete.

Part 1: Prep Work

1. Ensure Special Schedule is current and accurate. If updates are needed or if you are unsure if your agency has a Special Schedule, contact records.management@sos.oregon.gov.

2. Identify Program Subject Matter Experts who can provide accurate information regarding records in their area. These may be previously established Records Coordinators or other knowledgeable staff.

3. Ready a Master Retention List to use for your analysis. An Excel template with examples is available at https://sos.oregon.gov/archives/Pages/M365Retention.aspx, or you can create your own using the tool of your choice. At a minimum, the List should document:

    - Unit or employee to which retention will be assigned
    - Retention schedule citation
    - Assigned retention group within M365

Assigning Role-Based Retentions in M365

Part 2: Analysis

1. Work through the agency program by program, starting with the broadest groupings in your organization's structure. With each program, identify the Program Subject Matter Expert(s) who should be able to help answer questions about their program, eliminating the need to interview every employee.

2. With the Program Expert(s), identify which records are likely to be created or received in program emails and Teams messages. Review both the General Schedule and your agency's Special Schedules to ensure you have a complete list of all the relevant records series for the records identified.

   Note that for some programs, all the records they create may fall under just 1 or 2 records series, whereas other programs may need to use many different records series that have a variety of retention periods.

   Ignore records not created or received in email or Teams messages. You can also ignore those that are already routinely downloaded and retained elsewhere, such as in other software that serves as a System of Record for that series or in project files maintained in Windows shared drives. (For records stored elsewhere, the copy in email or Teams messages is considered a duplicate copy.)

3. For records series identified in step 2, find the longest retention period out of all of the series. If that retention is chronological (*retain 5 years, destroy*), note this as your target retention. If this retention is conditional, meaning it is based upon a future event (*retain 6 years after expiration, destroy*), set aside and look for the longest chronological retention. For conditional retentions, see ***Exceptions*** below for advice on managing these records.

   Note that some employees may create records that their teammates do not and may need a different, longer retention group than other employees in their program. This may include Directors, Managers, and those involved in legislative tracking and interpretation, such as Administrative Rules Coordinators or higher level Operation and Policy Analysts.

4. Using the target retention identified in step 3, compare to the available retention year groups within M365: 3, 5, 7, 10, 26, Permanent. If the target retention is not available, always round <u>up</u> to the nearest retention. This is now the M365 Retention Group for that program or employee. Document this on your Master List, including the citation for the series which gave you the target retention.

5. Repeat for each program until you have a complete Master Retention List for your agency.

Assigning Role-Based Retentions in M365

Exceptions

While doing analysis you may find certain records from series that do not fit within an easy retention group. These include:

- Series that have a significantly longer retention than the majority of a program's records and are not already saved outside of email;
- Series with a conditional retention (*retain X years after future event, destroy*) which cannot be assigned to a straight-forward M365 Retention Group;
- Records which currently only exist email or Teams messages, but would be better managed in a different system of record.

For these outliers, the program will need to decide on the appropriate process to ensure they are correctly retained for their full retention period. In many cases, there may already be another system in place that is a more appropriate location to file these records. If not, this process can be helpful in identifying and establishing those. In any case, a plan will need to be made for these outlier records to be stored for retention outside of Outlook/Teams prior to the M365 retention being met so that they are not prematurely destroyed. The State Archives team can help you examine these and determine the best course of action; contact us to set up a consultation.

Part 3: Activate M365 Retention Policies

1. Confirm with Program Managers/Administrators that you have a complete and update-to-date list of any records in email or Teams messages that are currently on destruction hold due to litigation, audit, or ongoing public records requests.

2. Contact the State Archives Records Management Unit at records.management@sos.oregon.gov. We will have a final meeting where you will receive the M365 Retention Readiness Confirmation signoff form and we will discuss the correct process for your agency to submit an IT request for the M365 Retention Group values to be added to employee profiles in M365.

3. Complete all of the steps on the M365 Retention Readiness Confirmation form and return a signed copy to your State Archives Records Management Unit contact. Your contact will then coordinate with DAS EIS to activate the retention policies for your agency.

4. At this time, you may also wish to establish review cycles for M365 Retention Groups, adding new employees to groups, etc., depending on your own agency policies.