



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, DC 20240

AUG 20 2018

OCIO Directive 2018-005

To: Heads of Bureaus and Offices

From: Sylvia Burns
Chief Information Officer [REDACTED]

Subject: Lifting of the Print-and-File Requirement for Preservation and Management of BisonConnect Electronic Mail

Purpose

This directive replaces the requirement of "Print-and-File" for BisonConnect Electronic Mail (email) archived in the eMail Enterprise Records and Document Management System (eERDMS). The directive supersedes all the following previous guidance:

- IRM Bulletin No. 1996006, Policy and Guidance for Managing the Creation, Retention, and Disposition Electronic Mail Documents
- IRM Bulletin No. 1997002, Department-wide Standards for the Retention of Electronic Mail (email) "System" Messages and Email System Backup Tapes
- Memorandum: Responsibility for Maintaining Electronic-Mail (E-mail) Records, July 9, 2004

This directive only applies to email archived into eERDMS. The guidance does not supersede or replace guidance related to historical email records not archived into eERDMS, nor to non-email records. Definitions of terms in this directive appear in Attachment 1: Definitions.

Effective Date

The requirements outlined in this directive are effective immediately and remain in effect until further notice. Bureaus and offices must be in full compliance of this directive no later than January 1, 2019.

Background

The Federal Records Act, 44 United States Code, Chapters 29-33 and Department of the Interior (DOI) Departmental Manual 380 – Records Management required DOI staff to print email and email attachments for Federal record keeping purposes. On January 23, 2013, eERDMS became the archive for all Bison Connect emails. All DOI organizations except for the National Park Service (NPS), Fish and Wildlife Service (FWS) and U.S. Geological Survey (USGS) also migrated historic emails (prior to January 23, 2013) into eERDMS. Therefore, NPS, FWS and

USGS employees must maintain historic email records prior to January 23, 2013. The Bureau of Indian Education (BIE) did not migrate to Bison Connect and does not maintain BIE emails in eERDMS. BIE employees must properly maintain BIE email records. The Office of the Chief Information Officer (OCIO) will retain and manage all DOI email and email attachments in eERDMS until appropriate disposition authorities and legal holds are in place, or until the emails are no longer designated as Federal Records. See the Definitions and Frequently Asked Questions (FAQs) attached to this directive for added guidance and instructions.

Requirements

This directive replaces the requirement for DOI Staff to print and file Bison Connect email and email attachments for Federal record keeping purposes. DOI Staff must follow their bureau records schedules or consult with their Responsible Records Officer regarding compliance with the recordkeeping requirements.

DOI Staff do not have direct access to eERDMS holdings; therefore, should continue to keep email and email attachments as necessary for general operational needs. Additionally, DOI Staff must continue to maintain email that are subject to active preservation requirements, such as Freedom of Information Act (FOIA), Congressional Oversight and Litigation. Please see Definitions and FAQs for added details.

Further Information

Please consult your Responsible Records Officer (<https://www.doi.gov/ocio/policy-mgmt-support/information-and-records-management/records/contacts>) for appropriate guidance regarding proper preservation and documentation of Federal Records within your respective organization. If your questions remain unresolved, the Responsible Records Officer should raise them to the Departmental Records Office. [REDACTED]

If you have questions about preservation/retention requirements relative to legal holds, please contact the Office of the Solicitor attorney-advisor overseeing that legal matter.

cc: Associate Chief Information Officers
Associate Chief Information Security Officers
Office of the Executive Secretariat
Office of the Solicitor
PMB Assistant Secretary
PMB Deputy Assistant Secretaries
DAS, Human Capital and Diversity
DOI Human Resources Officers
DOI Bureau Records Officers

Definitions and Frequently Asked Questions

BisonConnect Electronic Mail: BisonConnect email is the Software-as-a-Service providing email and collaboration functions for the following bureaus:

- Bureau of Indian Affairs (BIA)
- Bureau of Land Management (BLM)
- Bureau of Reclamation (BOR or USBR)
- United States Geological Survey (USGS)
- U.S. Fish and Wildlife Service (FWS)
- Office of the Secretary (IOS)
- Office of Natural Resources Revenue (ONRR)
- Bureau of Safety & Environmental Enforcement (BSEE)
- Bureau of Ocean Energy Management (BOEM)
- National Park Service (NPS)
- Office of the Solicitor (SOL)
- Office of the Inspector General (OIG)
- Office of Surface Mining, Reclamation & Enforcement (OSM or OSMRE)
- Office of the Special Trustee of American Indians (OST)
- Interior Business Center (IBC)

DOI Staff: Actual, on-board full- or part-time federal employees, contractors, volunteers, interns, seasonal workers, and detailees from other organizations who use DOI electronic messaging accounts.

Responsible Records Officer: A Bureau or Office Records Officer with delegated authority for a National Archives and Records Administration (NARA) Record Group. Responsible Records Officers may have responsibilities for multiple Offices and/or Bureaus.

Zantaz eMail Archive: Electronic mail captured and subsequently migrated to eERDMS between December 1, 2002 and January 23, 2013 for BIA, BLM, BOR, BOEMRE, MMS, NBC, OHA, OSM, OST, and SOL.

Should I continue to maintain emails that are part of project case files? Yes. Neither BisonConnect nor eERDMS automatically provide a means for maintaining project case files. You still need to file emails within the appropriate case files to meet program and bureau record keeping requirements. You can maintain project case files electronically. Please consult with your Responsible Records Officer at <https://www.doi.gov/ocio/policy-mgmt-support/information-and-records-management/records/contacts> on how this is accomplished within your respective bureau.

Should you keep all emails in BisonConnect in the possible event of future litigation holds or other preservation requirements? No. You only need to maintain BisonConnect emails that are subject to currently active litigation holds or other preservation requirements. If you are a custodian in a litigation matter, the SOL will notify you. If you receive one of these notifications, the law requires the DOI to maintain all copies of potentially responsive emails. You must maintain the emails that are responsive to the litigation hold (not all emails), in BisonConnect until the SOL lifts the hold. If the SOL has not notified you of a litigation hold or other preservation obligation, you can continue to dispose of BisonConnect email as needed to support your normal operational needs. If you have questions about preservation/retention requirements relative to legal holds, please contact the SOL attorney-advisor overseeing that legal matter.

What are examples of email content which this directive does not cover? Any email created or archived prior to the implementation of Bison Connect on January 23, 2013. Examples include the following:

- Zantaz eMail Archive prior to January 23, 2013 for all DOI trust bureaus;
- Any email sent or received prior to January 23, 2013, for the National Park Service, U.S. Fish and Wildlife Service and the U.S. Geological Survey;
- BIA and Office of the Secretary email from May 1, 2009 through June 30, 2012 when these bureaus used the Symantec Enterprise Vault email capture solution; and
- Bureau of Indian Education (BIE) eVault email capture solution.

When are emails no longer designated as Federal Records (as noted in the Background section of this Directive)? Some emails sent to you from outside sources are not Federal Records and are extraordinarily unlikely to have probative value in litigation. Common categories of these emails consist of outside newsletters, unsolicited promotional material, etc. While these emails are still archived to eERDMS, the OCIO and the SOL are developing a process to categorically identify and delete these emails from the eERDMS archive to improve search results and manage storage requirements. This effort, however, does not impact how you should manage your email within BisonConnect. You should continue to keep email and email attachments in BisonConnect that are necessary for ongoing operational needs as well as any that are subject to preservation holds.

Who does this policy affect? All DOI Staff, except those in the Bureau of Indian Education.

Who should you contact with questions related to managing electronic messages?

Questions on this policy should be first directed to the Responsible Records Officer at <https://www.doi.gov/ocio/policy-mgmt-support/information-and-records-management/records/contacts>.