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PREPARE PROJECT

Email Management: Roles and Responsibilities

The responsibilities for the management of email records are distributed throughout the enterprise of government. Email applications (e.g. servers and clients) are typically administered by information technology professionals. Email users are often tasked with organizing their communications into folders, classifying them by subject matter or level of importance, or otherwise organizing and describing them. Legal counsel are often tasked with reviewing electronic communications for privileged and confidential information. And lastly, records managers are tasked with making disposition and retention decisions. Simply put, the responsibility for managing email is a massive undertaking of governance.

One important part of managing this governance is to outline, as specifically as possible, the tasks necessary to ensure that email records meet all of their legal, administrative, and other requirements. Second to this, but as important, is the assignment of those tasks to specific roles within the enterprise. Roles do not necessarily need to be assigned to the same officials at the same agencies; indeed, some agencies may have dedicated records managers who can take on many of these responsibilities, while others may need to assign these roles to directors, counsel, administrators, and other staff.

It is essential that roles and responsibilities are defined clearly and consistently. Governance of email depends on the many officials involved in its lifecycle knowing for what they are accountable. Much like other public records, the employee is often the primary custodian of the record and the one most responsible for its care-taking. These employees need clear and concise guidance on how to execute their responsibilities; merely outlining what needs to be done, with no pathway for accomplishing it, is not adequate.

There are some responsibilities applicable to *all* custodians of email:

- Adhere to the requirements of all laws that govern the classification, sharing, retention, and disposition of public records
- Do not destroy emails unless specifically authorized to do so by law or regulation
- Protect and preserve essential public records in one's custody and control
- Establish a consistent procedure for managing one's own email (consistency within individual accounts greatly aids understanding and interpretation later)



Responsibilities (Tasks)

To properly manage email (which all governments must do), the tasks that make the management of email successful must be assigned to accountable individuals and organizations, or the public risks losing essential information.

Responsibilities related to email fall into two primary categories: those of the intellectual custodian and those of the physical custodian.

- Intellectual responsibilities are related to the contextualization or understanding of email records, and thus include those tasks that create, describe, organize, classify, modify, and ultimately destroy email.
- Responsibilities for physical custodians include the management of storage environments, preservation of form, maintenance of physical and digital infrastructure, and provision of access to emails.

While these two sets of tasks are interrelated, ultimately, they need not be performed by the same organizations, assuming that all involved clearly understand which tasks are assigned to which employees.

This distinction is necessary in a government context due to the diffuse nature of email governance, especially as it pertains to vendor/contractor services that are often present in technology-related processes. Many state and territorial governments use large vendors such as Microsoft and Google to support many of the tasks of physical custodianship of email, while leaving governments the intellectual control of the content and metadata. Given the number of individual employees involved in these processes (including those using email, managing servers, managing service-level agreements and contracts, and so on), it is valuable to clearly define employee responsibilities related to email management.

A list of potential responsibilities or tasks related to the management of email at an enterprise level include:

- Uses (sends and receives) email
- Organizes email into meaningful intellectual groupings
- Applies classification or taxonomies to sets of email (most likely through labels)
- Reviews email for sensitive, confidential, or otherwise private information
- Classifies email according to established data standards
- Destroys email when its legal requirements (including retention) have been satisfied
- Maintains software (applications, platforms, systems) to send, receive, and manage email
- Maintains hardware (networks, servers, etc) on which email and related applications are deployed
- Searches email records (for a variety of reasons)
- Provides access to other users' emails for public disclosure (public records and FOIA requests), legal proceedings (e.g. discovery), and administrative proceedings (e.g. human resources actions)



Roles

Tasks should always be assigned to those employees who are best-positioned to make the most informed decisions, and who have the proper authority to make those decisions.

Roles can create consistency throughout generally inconsistent and disparate service areas, which aids greatly in the long-term governance of information.

No matter which systems are in place in our public agencies, many tasks and decisions related to the management, preservation, retention, and classification of email and related information are going to be distributed throughout the government. For example, the task of preserving and managing inactive records often falls to statewide archival or records management services; management of active records, on the other hand, has typically fallen to the record creators and users.

Tasks should always be assigned to those employees who are best-positioned to make the most informed decisions, and who have the proper authority to make those decisions; this is effective records management.

Roles are common groupings of tasks that can be overlaid atop individual positions to create enterprise-wide consistency to the approach of managing email records. Every public agency may have a slightly different way of organizing its subdivisions and assigning its tasks; creating standard roles that can be assigned to positions of appropriate authority can save time and promote efficiencies in training and workflows.

Roles are valuable because they simplify the process of communicating responsibilities to employees. Training can be conducted for all employees with the same role (e.g. email user), and many platforms have the ability to create role-based permissions and authorities, allowing fine-tuning and assignment of responsibilities. Furthermore, roles can create *consistency* throughout generally inconsistent and disparate service areas, which aids greatly in the long-term governance of information.

There are no perfect ways to assign tasks to individual roles; statute, regulation, and policy will be determining factors in deciding which tasks can be handled by the same roles, and which roles can be assigned to each. Below are some examples of roles that may be defined in your enterprise:

- **User.** Day-to-day classification, organization, and sharing of email. Typically assigned to end-users (e.g. the named account-holders). In government, many employees are issued an email account as part of their computing environment.
- **Email Server Administrator.** Maintains and operates the email server. Establishes roles, responsibilities, and Standard Operating Procedures (SOPs) for user behavior within this system.
- **Supervisor.** Enforces department, agency, or enterprise email policies among staff. Ensures that established email policies, including classification, organization, usage, and retention, are followed. Ensures email is retained during employee separation.
- **Reviewer/Redactor.** Reviews email content and metadata for confidential information: Personal Identifiable Information (PII), Personal Health Information (PHI), privilege, inspection exemptions. Creates redacted versions of public records.
- **FOIA Officer/Public Records Request Manager/Public Information Officer** (or similar titles). Receives and triages public information requests. Searches for information related to incoming queries. (Optional) Searches for and redacts sensitive information. Packages sets of records for public distribution. Distributes information packages to requestors.
- **Records Manager.** Establishes retention schedules and other policies related to the retention of email. Develops taxonomies or other SOPs for the sorting and classification of email. Coordinates email transfers. Destroys inactive email that has satisfied its retention requirements.



Combining Roles and Requirements

Developing governance for email necessitates the thoughtful assignment of tasks to roles. Not all employees have the degree of technical expertise to accomplish certain tasks; others might lack the necessary authority to do so. Applying roles is likely to be part of an *operational implementation* rather than a high-level policy. Use roles and responsibilities in agency, department or unit email management procedures, handbooks, and manuals.

Some questions should be asked during this process:

- Are roles defined strictly (perform only the tasks assigned) or loosely (perform at least the tasks assigned)?
- Do roles overlap (an individual might have several roles) or are they exclusive (one role per individual)?
- Are tasks assigned to roles required, suggested, optional, or anywhere in between?
- Are individuals who are expected to take on certain roles *able* to perform those roles?
- Are there any external requirements (e.g. authorized access, technical training) that are prerequisites for performance in a role?

About CoSA

The Council of State Archivists (CoSA) is a nonprofit membership organization of the state and territorial government archives in the fifty states, five territories, and District of Columbia. Through collaborative research, education, and advocacy, CoSA provides leadership that strengthens and supports state and territorial archives in their work to preserve and provide access to government records. CoSA facilitates networking, information sharing, and project collaboration among its member organizations to help state and territorial government archives with their responsibilities for protecting the rights and historical documents of the American people.

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