



COLORADO DEPARTMENT OF REVENUE POLICY

Google Vault: Email and Other Electronic Message Retention

Policy Number

AOD-037

Owner

Records
Management

Approved By

Meghan Tanis
Deputy Executive
Director / Chief
Operating Officer

Effective Date

December 29, 2023

Current Version

2.0

Purpose

Implement industry best practices to reduce the quantity of sensitive information potentially at risk in the event of unauthorized access to CDOR's email system.

Scope

Applies to all CDOR users (e.g. employees, contractors, agency temps) of "Google Workspace Enterprise Plus" under the @state.co.us domain.

Definitions

Electronic Messages: Messages that relay information among users electronically. Email, instant messaging, Google Chats, Google Spaces, notes, tasks, and meeting invites are all forms of electronic messages.

Google Workspace Enterprise Plus: Cloud-based productivity and collaboration tools/products developed by Google. Google Workspace Enterprise Plus is comprised of Gmail, Meets, Calendar, Chat, Spaces, Contacts, Google Drives, and Google Vault. Google Docs, Sheets, Slides, Forms, and Sites are also included.

Google Vault: A web-based application for Google Workspace that can apply retention rules. This application can retain, search, and export data from email messages, Groups, files in Google Drive including Shared Drives, and conversations in Chat (if history is turned on). Google Vault also includes audit reports to monitor Vault administrator activities.

Litigation Hold: A term applied to the steps an organization must take to preserve potential evidence and to suspend its routine destruction of records and non-records including electronically stored information. A litigation hold is sometimes referred to as a legal hold.

Retention: For this policy, retention refers to the amount of time that email and other electronic messages are remained before they are automatically deleted by the system.

Policy

1. Employees are responsible for managing their office electronic messages in accordance with this policy. Both the author and the recipient of the electronic message must use their best judgment in determining whether to keep or archive an electronic record and, if it should be kept, which employee should retain it.
2. CDOR has implemented Google Vault with a two-year email retention policy and a "DONOTDELETE" label.
3. The two-year retention period applies only to Gmail. Email will automatically be removed from a user's mailbox two-years and one day from when the message was received, sent, or created. This includes all emails sorted into the labels listed on the left-hand side of the Gmail screen such as Inbox, Starred, Snoozed, Important, Sent, Scheduled, Drafts, Spam, Categories, etc. and all labels created by users.



4. If a user needs to retain an email for more than the two-year retention period, the user may do so by applying the “DONOTDELETE” label. Before relying on this label to protect an email from automatic deletion, review and understand the instructions on how to create and apply the “DONOTDELETE” label. These instructions can be found in Chapter 10 of the Records Management Manual, titled, “DOR OIT Systems Record Retention: Email.” WARNING! Emails stored in subdirectories created under a “DONOTDELETE” label are not retained beyond the two-year retention period unless the “DONOTDELETE” label is also manually applied to each email.
 - Do not abuse usage of the “DONOTDELETE” label by applying it to all emails. Reports can be run to determine usage of this label on individual Gmail accounts.
 - Do not forward your state email to a non-state email account in an attempt to avoid the retention period or conduct CDOR business from any email account other than the account assigned to you by the State’s Office of Information Technology (OIT). Forwarding your state email to a non-state email account could place the email at a much higher risk for unauthorized access and have other detrimental effects. Reports can be run to determine this type of activity.
 - Label email as “DONOTDELETE” if emails are needed for reference as part of a project or task that will not be completed within two-years. Once the initiative is completed, any non-record emails that are needed for reference can be saved as a PDF and stored on a network drive or Google drive. Then the “DONOTDELETE” label should be unapplied or simply delete all the emails associated with the initiative.
5. Under records management best practices and the statutory definition of records, email systems are not record repositories. Official records in an email system should be removed from the email system and placed in a designated record storage location per the section’s filing plan based on the SA-194 (records retention schedule).
6. Be mindful if any emails could be subject to a litigation hold and follow all instructions in any litigation hold notices you have received. For general questions concerning litigation holds, contact the division’s or section’s records custodian or the director of records management. For questions concerning a specific litigation hold notice, contact the assigned assistant attorney general listed in the litigation hold notice. For general information on the litigation hold process see Chapter 7 of the Records Management Manual. Chapter 7, *Litigation Holds and Records Management* can be found [here](#) on CDOR’s intranet.
7. Google Chats will automatically be deleted after 24 hours. Google Space messages will be deleted after 30 days if the creator/manager of the Google Space turns on history. If the history is off, the messages will be removed in 24 hours.
 - Google Chats and Google Spaces should only be utilized for transient messages which are personal in nature, of fleeting or no value, or otherwise not created or received in the course of state business.
 - If Google Chat or Space messages must be retained based on content, the user should save the information in another format, i.e., email, screenshot, etc.

Standard Operating Procedures

For additional information on email retention including instructions on how to effectively use the “DONOTDELETE” label, refer to Chapter 10 titled, “*CDOR OIT Systems Record Retention: Email and Other Electronic Messages*” in the Records Management Manual located [here](#) on the intranet under Administrative Offices Division/Records Management/Records Management Policy and Procedures.

Contacts

For questions and/or clarifications concerning the usage of this policy or records management, contact:
AOD – Records Management – Director of Records Management
Use AOD’s organizational chart on CDOR’s intranet to determine staff currently assigned to this position.

The disregard or violation of this policy by any Department employee may result in corrective or disciplinary action up to and including termination.



Revision History

Ver #	Date	Revised/Reviewed By	Activity/Changes
0.1	08/29/18	Steve Norman	Initial draft for review and comment.
0.2	10/02/18	Steve Norman	Incorporated changes from stakeholders.
0.3	01/23/19	Steve Norman	Incorporated changes from legal review.
0.4	02/14/19	Steve Norman	Final changes before release pending decision on retention period. Placed on indefinite hold.
0.5	06/22/21	Steve Norman	Resurrected with a two-year retention period.
1.0	07/15/21	Steve Norman	EC review complete – ready for release.
1.1	12/19/23	Policy Mgmt. Section	Updated for retention on Google Chat and Spaces for review and comment.
2.0	12/28/23	Policy Mgmt. Section	Incorporated comments received.