MEMORANDUM

Date: July 7, 2022

To: The Honorable Chair and Members
   Pima County Board of Supervisors

From: Jan Lesner
   County Administrator

Re: Administrative Procedure 27-5 Email Governance, Migration and Records Retention

The Information Technology Department (ITD) is in the process of migrating County employee emails to Exchange Online, a cloud-based system. This migration has been taking place department by department and is scheduled to be complete in August. The Board of Supervisor’s emails, and those of your staff, have not yet been migrated and the timing and details of such will be communicated by ITD in advance. ITD does not manage email systems for the County Recorder, County Attorney, and the Courts. ITD does manage the Sheriff’s email system, but their email migration will not take place until later this year.

As part of this email migration, additional storage is available at no cost to Pima County. Limited storage was one reason that employee emails were automatically deleted after 60 days, with the exception of those placed on litigation hold. With the completion of this migration to Exchange Online, employee emails will no longer be automatically deleted by ITD. Employees are still responsible for practicing proper records management, and retaining and deleting emails that are records according to their department’s record retention schedule. Calendar entries will be retained for a maximum period of three years before automatic deletion by ITD. Size limits for employee inboxes will be implemented and employees will be notified when they are approaching the limit. The attached updated Administrative Procedure 27-5 reflects these changes (clean copy and changes in legislative style).

On or before September 1, a message will be sent to all employees announcing the completion of the email migration to Exchange Online, and the fact that emails will no longer be deleted after 60 days. The message will also include helpful tips for email records management.

JKL/anc

Attachments

c: The Honorable Suzanne Droubie, Pima County Assessor
   The Honorable Beth Ford, Pima County Treasurer
   The Honorable Dustin Williams, Pima County Superintendent of Schools
   The Honorable Michael Stevenson, Presiding Constable
   Department Directors
   Carmine DeBonis, Jr., Deputy County Administrator
   Francisco Garcia, MD, MPH, Deputy County Administrator
   Mark Hayes, Interim Chief Information Officer, Information Technology Department
   Melissa Manriquez, Clerk of the Board
   Dan Jurkowitz, Civil Deputy County Attorney
   Kristen Irby, Deputy Director, Information Technology Department
   Eric Flohr, Clerk of the Board’s Records Manager
   Nicole Fyffe, Senior Advisor, County Administrator’s Office
I. PURPOSE

The purpose of this procedure is to establish standards for the governance and use of electronic mail (email) by Participants in the Pima County Information Technology (IT) Program who are provided access to Pima County email systems.

County email systems hosted on premise and in the cloud are intended to facilitate communications among Participants and other external business contacts to assist in performance of job functions. Usage of County Email System(s) is limited to County business. Each Participant has a responsibility to use an email system in a productive and acceptable manner. To achieve these objectives, those Participants utilizing County email systems shall adhere to and be bound by the requirements of this procedure.

II. DEFINITIONS

COUNTY ADMINISTRATOR - The County Administrator or designee.

ELECTRONIC MAIL (email) – Digital content that is created and disseminated (“mailed”) electronically from a sender to one or more recipients in and through the Pima County IT Program. This includes any content conveyed as an attachment to or embedded into an email message. Such content, whether sent or received, is considered to be the property of Pima County. Electronic calendars integrated into County Email Systems are included in consideration of email, as it is an email transaction that sets and removes calendar appointments.

EMAIL AS A RECORD – An electronic mail message created and/or received by Participants is a record if it documents the organization, functions, policies, decisions, procedures, operations, or other activities of the County, and must be maintained in accordance with the guidelines of the Pima County Records Program.
EMAIL SYSTEM – A system used and supported in the Pima County IT Program that includes, but is not limited to, all electronic systems, computing hardware, software including operating systems of computing hardware, electronic content stored in temporary and/or permanent files, and any related systems or devices used in the transmission, receipt, and storage of email and electronic calendar appointment management. This email system may reside on premise or in a cloud environment that is funded through the Pima County IT Program.

LITIGATION HOLD – The retention of records for ongoing or foreseeable official proceedings such as audits, lawsuits, and investigations. Email messages, attachments, and associated metadata shall be preserved in their native format for litigation holds.

PARTICIPANT(S) – Individual(s) afforded access to the Pima County IT Program to include employees and other preapproved persons who have signed Pima County Information Technology Program Acknowledgement (PCITPA) form(s) per Administrative Procedure 27-4.

PIMA COUNTY INFORMATION TECHNOLOGY PROGRAM – Comprised of all components of the IT Environment, IT Resources, Enterprise Applications, and Business Applications (as defined and the content therein as stated in BOS Policy D 27.1).

III. PROCEDURE

A. Departments shall obtain email accounts for Participants within their areas of responsibility by completing User Request Forms (URF) found in the Forms area of the IT Department (ITD) Intranet site. Completed forms are to be attached to Pima County Service Portal requests to create new accounts.

B. Email messages are retained indefinitely until Participant determines they are to be deleted or the maximum space allocated for each Participant mailbox has been reached (see paragraph D below). Calendar entries are retained for a maximum period of three years, subject to Participant mailbox size limits, before automatic deletion.

C. It is the responsibility of Participant to determine if an email message, based on its content, should be classified as a public record. Participants must correctly save records, based on content, for the appropriate retention/archive periods specified by Participant department or County. Email messages classified as a public record can be retained within the email system utilizing retention/archive rules, or saved into another storage system (e.g. OneNote, OnBase, Participant’s U drive, etc.). All other email messages should be deleted in a timely manner.

D. Size limits for Participant mailboxes may be implemented based on the recommendation of the IT Director and direction provided by the County Administrator.

E. The County will periodically monitor email to verify Participant conformance to this policy. Appointing Authorities may request access to monitor messages and files on County devices. Communications, including text, images, and attachments may be disclosed to law enforcement or other third parties without the consent of the Participant.

Requests to monitor user accounts:
A completed Email Monitoring Request Form (Attachment A) approved by the Appointing Authority shall be submitted to the IT Director. This form is found in the Forms area of the PCITD Intranet site.

F. Non-exempt employees shall not access their Pima County email outside authorized work hours.

G. Participants shall access their Pima County email only through authorized County devices and other connections as determined by the County Administrator. If a Participant is uncertain whether a connection has been approved for such use, he/she must contact the ITD Network Operations Center (NOC) for additional information before proceeding.
H. Official Pima County business shall not be conducted from a Participant’s private (non-County sponsored) email system. An email sent from a personal electronic mail account by a Participant conducting official Pima County business is in violation of this procedure and creates a record that is subject to public records laws. Additionally, other emails from the personal electronic mail account may become public under a discovery request when that account is impermissibly used for Pima County business.

I. Email records are subject to disclosure upon request pursuant to Arizona's Public Records law and under Administrative Procedure 4-4. No Participant has a reasonable expectation of privacy for any information found or transmitted on the County email system.

J. Departments shall complete a Separation of Access (SOA) Form for all Participants in the Pima County Information Technology Program whose email access must be temporarily or permanently disabled (for a variety of reasons). This form is found in the Forms area of the PCITD Intranet site. A completed form is to be attached to a Pima County Service Portal request to disable the email account along with other IT Program access.

IV. GUIDELINES

A. Appropriate usage of email and County Email System shall be considered relevant to performance of County business-related duties as follows:
   a. Is of the nature of County-related business which includes but is not limited to:
      i. Correspondence within County government;
      ii. Correspondence with entities doing business with or on behalf of Pima County;
   b. Scheduling of personal appointments in an associated electronic calendar as an effective extension of one’s overall job time management (lunches, meetings, etc.);
   c. Sharing of County event information;
   d. Sharing information within the department, with the approval of the Appointing Authority, regarding work-related social events and charitable activities.

B. Inappropriate usage of email and County Email System. Unacceptable and therefore prohibited uses of the IT Program email System include, but are not limited to:
   a. Using the system for personal gain, advancement of individual views that are unrelated to the performance of official County business, or solicitation of non-County business;
   b. Developing or retaining content which violates state or federal law including, but not limited to, violation of intellectual property and/or confidentiality laws;
   c. Attempting to influence the outcome of an election (Arizona Revised Statutes § 11-410);
   d. Using the system for political messages, unapproved charitable endeavors, solicitation of funds, advertisements, private business activities, or other unapproved non-County business-related purposes;
   e. Forwarding chain letters, stories, email petitions, warnings, pictures, programs or other non-County business-related materials;
   f. Except for legally privileged or confidential communications, transmission of sensitive/private information such as Social Security Numbers or employee/family member health information within the body of an email, or as an attachment, unless the email is encrypted such that only the intended recipient may de-encrypt the message.
   g. Transmitting confidential information regarding personnel matters, personnel decisions, progressive discipline, or grievances, within the body of an email, or as an attachment, to anyone who does not have a need to know.
   h. Distributing content which is discriminatory, harassing, or disruptive which includes, but is not limited to, content that is sexually explicit, derogatory or abusive; threatening images; cartoons, jokes, or inappropriate or profane language;
   i. Misrepresenting, obscuring or concealing the identity of sender or recipient, or routing of email or encrypting email with the intent to disguise, hide, or prevent detection of violation of this Procedure;
j. Using the County Email System for personal use, other than as described in section A.b above, without the prior written consent of the Participant’s Appointing Authority;

k. Any Email System usage that could create the appearance of inappropriate use. Note that what is offensive, harassing, disruptive, illegal or contrary to policy is determined on an objective not a subjective basis: i.e., it is not an excuse that neither the sender(s) nor the recipient(s) was offended or did not consider the contents harassing, disruptive, illegal or contrary to policy.

C. Shared Email Accounts: Participants may not intercept, record, receive, access, read or alter another Participant’s email without authorization. Sharing of individual email accounts or usage authentication credentials is prohibited; the exception being if Participants are sharing a generic email account for business purposes. An example is a common generic email account used by multiple Participants for handling requests that come from internal (to County government) and/or external customers, such as a generic Service Desk account which is monitored by several Participants.

D. Shared Electronic Calendar within Email System: Participants are free to share their Email System calendar to facilitate efficient time management and planning. This includes designating Participants the ability to set calendar appointments on behalf of another Participant.

E. Participant Email Signature: Email applications can be configured to automatically include an electronic signature containing a Participant’s identification and contact information in a message. Participants are encouraged to configure this feature of the Email System. However, Participants are reminded that email messages created, replied to, or forwarded are not personal messages, nor are they a public forum for expression of personal and private opinions. Any email sent from a Pima County email account shall not contain any extraneous statement, saying, symbol, or link to any matter that is not a formal Pima County statement, symbol, or link. Signatures may contain a Pima County symbol (such as the County seal) and links to Pima County web pages, but may not contain any personal opinion, personal quotation or non-County symbol, without the written approval of the County Administrator.

An email signature shall be modest in size and may contain a Participant’s:

a. Name  
b. Title  
c. Certifications  
d. Business phone numbers  
e. Address/location  
f. Department and Division name  
g. Pima County symbol, such as the County seal

An email signature may not contain the following:

a. Logos  
b. Quotes  
c. Electronic Business Card

V. RESPONSIBILITY

A. The County Administrator shall determine:

a. The Email System(s) to be used within Pima County departments  
b. The maximum amount of individual Participant email storage in an appropriate Email System(s)  
c. The maximum size of content attached to an email message  
d. The appropriate companion Business Application to the Email System which will filter incoming email content for inappropriate materials and "spam"

B. Departments will collect, maintain, and share correct email address information with other County departments to facilitate efficient addressing and delivery of email throughout the County Email System(s).
C. All Participants must be familiar with this Administrative Procedure as well as Administrative Procedure 27-4: Pima County Information Technology Program, and BOS Policy D 27.1: Pima County Information Technology Program in order to understand concepts and terminology. Participants are also required to annually acknowledge that they have read and understand the aforementioned Policy and Procedures.

D. Implementation of and adherence to this policy resides at all levels of the County. Adherence to all federal and state laws is a Participant's responsibility. Any Participant in the IT Program found in violation of this Procedure will be subject to appropriate corrective action, up to and including termination of employment or business relationship.

References:
- Board of Supervisors Policy D 27.1
- Administrative Procedure 4-4
- Administrative Procedure 4-5
- Administrative Procedure 27-4
EMAIL MONITORING REQUEST FORM

Complete and submit this form to Pima County Information Technology Department per the instructions (III C).
All records will be provided electronically unless otherwise specified.

INITIATION REQUEST DATE: ________________________  NUMBER OF MONITORING DAYS

☐ 30       ☐ 60       ☐ 90

EMPLOYEE INFORMATION

EMPLOYEE NAME _______________________  EIN _______________________  DEPARTMENT _______________________

AUTHORIZED INDIVIDUALS

Individuals authorized to release the monitoring: _______________________
Individuals authorized to obtain monitoring information: _______________________

PROBABLE CAUSE/REASON FOR MONITORING

ADDITIONAL INFORMATION REGARDING THIS MONITORING REQUEST

FORM COMPLETED BY _______________________  PHONE _______________________

At the end of the time period requested above email monitoring shall end, unless a new request is submitted to extend the monitoring period. Additionally, at the end of the monitoring period, any email records in excess of the County’s email retention period (60 days) shall be electronically removed and shall no longer be available.

APPOINTING AUTHORITY NAME/SIGNATURE ____________________________________________  DATE __________

To end email monitoring earlier than the time frame specified above, complete the following release:

AUTHORIZED PERSON (AS LISTED ABOVE) _______________________  DATE __________

2/19/2016

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Attachment A
Legislative Version
I. PURPOSE

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EMAIL SYSTEM – A system used and supported in the Pima County IT Program that includes, but is not limited to, all electronic systems, computing hardware, software including operating systems of computing hardware, electronic content stored in temporary and/or permanent files, and any related systems or devices used in the transmission, receipt, and storage of email and electronic calendar appointment management. This email system may reside on premise or in a cloud environment that is funded through the Pima County IT Program.

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A. Departments shall obtain email accounts for Participants within their areas of responsibility by completing User Request Forms (URF) found in the Forms area of the IT Department (ITD) Intranet site. Completed forms are to be attached to Online Service Catalog Pima County Service Portal requests to create new accounts.

B. Email messages are retained for a period of sixty (60) calendar days, indefinitely until Participant determines they are to be deleted or the maximum space allocated for each Participant mailbox has been reached (see paragraph D below), after which they are electronically removed from the email system, unless the user account has been placed on Litigation Hold by the County Attorney or Appointing Authority. Calendar entries are retained for a maximum period of three years, subject to Participant mailbox size limits, before automatic deletion.

C. It is the responsibility of Participant to determine if an email message, based on its content, should be classified as a public record. Participants must correctly save records, based on content, for the appropriate retention/archive periods specified by Participant department or County. Email messages classified as a public record can be retained within the email system utilizing retention/archive rules, or saved into another storage system (e.g. OneNote, OnBase, Participant’s U drive, etc.). All other email messages should be deleted in a timely manner.

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F. Non-exempt employees shall not access their Pima County email outside authorized work hours.

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a connection has been approved for such use, he/she must contact the ITD Network Operations Center (NOC) for additional information before proceeding.

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   c. Attempting to influence the outcome of an election (Arizona Revised Statutes § 11-410);
   d. Using the system for political messages, unapproved charitable endeavors, solicitation of funds, advertisements, private business activities, or other unapproved non-County business-related purposes;
   e. Forwarding chain letters, stories, email petitions, warnings, pictures, programs or other non-County business-related materials;
   f. Except for legally privileged or confidential communications, transmission of sensitive/private information such as Social Security Numbers or employee/family member health information within the body of an email, or as an attachment, unless the email is encrypted such that only the intended recipient may de-encrypt the message.
   g. Transmitting confidential information regarding personnel matters, personnel decisions, progressive discipline, or grievances, within the body of an email, or as an attachment, to anyone who does not have a need to know.
   h. Distributing content which is discriminatory, harassing, or disruptive which includes, but is not limited to, content that is sexually explicit, derogatory or abusive; threatening images; cartoons, jokes, or inappropriate or profane language;
i. Misrepresenting, obscuring or concealing the identity of sender or recipient, or routing of email or encrypting email with the intent to disguise, hide, or prevent detection of violation of this Procedure;

j. Using the County Email System for personal use, other than as described in section A.b above without the prior written consent of the Participant’s Appointing Authority;

k. Any Email System usage that could create the appearance of inappropriate use. Note that what is offensive, harassing, disruptive, illegal or contrary to policy is determined on an objective not a subjective basis: i.e., it is not an excuse that neither the sender(s) nor the recipient(s) was offended or did not consider the contents harassing, disruptive, illegal or contrary to policy.

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E. **Participant Email Signature:** Email applications can be configured to automatically include an electronic signature containing a Participant’s identification and contact information in a message. Participants are encouraged to configure this feature of the Email System. However, Participants are reminded that email messages created, replied to, or forwarded are not personal messages, nor are they a public forum for expression of personal and private opinions. Any email sent from a Pima County email account shall not contain any extraneous statement, saying, symbol, or link to any matter that is not a formal Pima County statement, symbol, or link. Signatures may contain a Pima County symbol (such as the County seal) and links to Pima County web pages, but may not contain any personal opinion, personal quotation or non-County symbol, without the written approval of the County Administrator.

An email signature shall be modest in size and may contain a Participant’s:

- Name
- Title
- Certifications
- Business phone numbers
- Address/location
- Department and Division name
- **Pima County symbol, such as the County seal**

An email signature may not contain the following:

- Logos
- Quotes
- Electronic Business Card

V. **RESPONSIBILITY**

A. The County Administrator shall determine:

- The Email System(s) to be used within Pima County departments
- The maximum amount of individual Participant email storage in an appropriate Email System(s)
- The maximum size of content attached to an email message
- The appropriate companion Business Application to the Email System which will filter incoming email content for inappropriate materials and “spam”
B. Departments will collect, maintain, and share correct email address information with other County departments to facilitate efficient addressing and delivery of email throughout the County Email System(s).

C. All Participants must be familiar with this Administrative Procedure as well as Administrative Procedure 27-4: Pima County Information Technology Program, and BOS Policy D 27.1: Pima County Information Technology Program in order to understand concepts and terminology. Participants are also required to annually acknowledge that they have read and understand the aforementioned Policy and Procedures.

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References: Board of Supervisors Policy D 27.1
Administrative Procedure 4-4
Administrative Procedure 4-5
Administrative Procedure 27-4
EMAIL MONITORING REQUEST FORM

Complete and submit this form to Pima County Information Technology Department per the instructions (III C). All records will be provided electronically unless otherwise specified.

<table>
<thead>
<tr>
<th>INITIATION REQUEST DATE:</th>
<th>30</th>
<th>60</th>
<th>90</th>
</tr>
</thead>
</table>

**NUMBER OF MONITORING DAYS**

**EMPLOYEE INFORMATION**

<table>
<thead>
<tr>
<th>EMPLOYEE NAME</th>
<th>EIN</th>
<th>DEPARTMENT</th>
</tr>
</thead>
</table>

**AUTHORIZED INDIVIDUALS**

Individuals authorized to release the monitoring:

Individuals authorized to obtain monitoring information:

**PROBABLE CAUSE/REASON FOR MONITORING**

**ADDITIONAL INFORMATION REGARDING THIS MONITORING REQUEST**

At the end of the time period requested above email monitoring shall end, unless a new request is submitted to extend the monitoring period. Additionally, at the end of the monitoring period, any email records in excess of the County’s email retention period (60 days) shall be electronically removed and shall no longer be available.

<table>
<thead>
<tr>
<th>APPOINTING AUTHORITY NAME/SIGNATURE</th>
<th>DATE</th>
</tr>
</thead>
</table>

To end email monitoring earlier than the time frame specified above, complete the following release:

<table>
<thead>
<tr>
<th>END DATE</th>
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<table>
<thead>
<tr>
<th>AUTHORIZED PERSON (AS LISTED HEREIN)</th>
<th>DATE</th>
</tr>
</thead>
</table>

2/19/2016