



ARA-8.12 - Management, Preservation and Storage of Electronic Records and Electronic Mail Correspondence (E-Mail)

Administrative Rules Adopted by City Council (ARC)

Policy category: [Archives & Records Management](#)

Policy number: ARA-8.12

Search Code, Charter, Policy

Keywords

Search

[ARA 8.12 Management, Preservation and Storage of Electronic Records \(full text of policy\)](#) 372.5 KB

A. Purpose

This policy gives City elected officials, the City Administrator, and agencies direction on complying with: Human Resources Administrative Rule 1.03 (Public Records Information, Access and Retention); Human Resources Rule 4.08 (Information Technologies); Auditor's Office Administrative Rule 3.04 (Employee Behavior and Expectations); and Code Chapter 3.76 (Public Records).

City Code provides in part:

3.76.050 Duties of Elected Officials, City Administrator, and Agencies.

City elected officials, the City Administrator, and agencies must:

1. Make and preserve records containing adequate documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency which are designed to furnish the information necessary to protect the legal and financial rights of the City and of persons directly affected by the agency's activities;
2. Ensure staff compliance with City records policies and procedures established by Archives & Records Management;

Although Code Section 3.76.010 B. refers to public records "regardless of physical form or characteristic," this rule focuses specifically on the management and preservation of records maintained in a digital or electronic form, including electronic mail correspondence (email). Since electronic records cannot be accessed, used, or stored without the aid of computer hardware, software, and storage media – all of which are subject to frequent obsolescence – special steps must be taken to preserve the

reliability, authenticity, and accessibility of electronic records for the duration of their retention period.

B. Policies

Each agency must establish procedures to identify which electronic records constitute evidence of the agency's organization, functions, policies, decisions, procedures, and essential transactions.

1. Not everything stored on a City computer or server meets the definition of a "record" for retention purposes. This policy is concerned with the management and preservation of records as described in Code Section 3.76.050, paragraph A. Agencies possess other electronically stored information that – although not a record as defined in Code Section 3.76.010 B. – is discoverable in the event of litigation or that may be subject to disclosure for a public records request. Consult the Office of the City Attorney for guidance on responding to litigation or to public records requests.^[1]
2. The focus of this policy is limited to those electronic documents, emails, or data collections that an agency or individual consciously regards as evidence of that agency's "functions, policies, decisions, procedures, and essential transactions of the agency."

Each agency must establish procedures to identify the record copy of its electronic records and assign recordkeeping responsibilities to specific positions.

1. Electronic records are easily copied and distributed. Once an agency establishes which electronic documents, data, and emails constitute evidence of its activities, it must then identify **which copy** is the one that will be maintained officially for retention purposes and assign responsibility for keeping it. This copy is known as the record copy.^[2]
2. Agency management must identify which position within the agency is responsible for maintaining each category of that agency's official City records. The individual that is responsible for a particular function, project, or program is required to maintain the official copy of all records, as well as internal and external email correspondence, both incoming and outgoing, related to that responsibility. If job responsibilities overlap or are shared as part of a work team, agency management must clearly delineate and assign specific responsibilities for maintaining electronic records and email correspondence and ensure that the assigned roles are understood.
3. This designation process is important because once the record copy has been identified and assignments have been made to preserve it, other copies (known as convenience copies) no longer need to be retained. As a responsible practice, agencies must establish procedures to remove convenience copies regularly from individual or network drives. Similarly, individuals not responsible for maintaining the record copy of sent or received emails may retain copies for informational purposes but should delete them as soon as possible. If the designated record copy is a paper record, it is acceptable to retain

an electronic version for easy access – but as soon as the need for frequent access diminishes, these electronic convenience copies should be purged. If steps are not taken to identify record copy emails and electronic records and assign retention responsibilities for them, the City may find that no one retains these records or that everyone retains them. Neither of these scenarios is acceptable.

Each agency must establish procedures to regularly review the information kept on its individual or network drives.

1. To ensure that City records are being properly managed and preserved, each agency must establish policies and procedures directing employees to regularly review their electronic records residing on agency computer hard drives and network drives.
2. The purpose of this review is to:
 - A. Identify which files and emails constitute official records that must be retained per the City retention schedule.
 - B. Migrate official City records to a suitable storage repository together with sufficient indexing information or taxonomy to allow for proper retention and future retrieval of the records.
 - C. Determine which files are convenience copies or do not constitute official records and remove them from City network drives/servers.

Each agency must establish procedures to ensure that electronic correspondence (email) is properly managed and retained.

1. Categorization of email records by subject matter content

It is not allowable under Oregon Administrative Rules to attach a single retention period to all emails (OAR 166-200-0200). Since the content of an email message can vary immensely – from a lunch invitation to a critical agency decision – the retention of email must be based on the content and context of the message and its attachments.

Not every email sent or received needs to be retained. The user must determine which of the following two categories the email falls under:

Transitory Information or Correspondence.

A. Transitory Information

Emails of short-term interest (90 days or less) that do not need to be retained once read or acted on if not necessary to satisfy legal, administrative, fiscal, tribal, cultural, or historical obligations of the City, as defined by ORS 192.005. Included are such records as:

- Routine requests for information or publications and copies of replies which require no administrative action, no

policy decision, and no special compilation or research for reply

- Originating office copies of letters of transmittal that do not add any information to that contained in the transmitted material
- Quasi-official notices including memoranda and other records that do not serve as the basis of official actions, such as notices of office parties, holidays or charity fund appeals, and other similar records
- Records documenting routine activities containing no substantive information, such as routine notifications of meetings, scheduling of work-related trips and visits, routine logistical information, and other scheduling related activities^[3]
- Listserv messages
- Reading materials
- Reference materials
- FYI email information that does not elicit a response
- Unsolicited advertising

Emails that fall under the *Transitory* category should be deleted from the email system by the user as soon as any operational or informational value has expired.

B. Correspondence

Emails that directly relate to City programs, management, or administration. These include but are not limited to formal approvals, directions for action, communications about contracts, purchases, grants, personnel, etc; and correspondence relating to a particular project or program.

Email messages that fall under the *Correspondence* category must be managed as an official City record in a suitable storage environment.

2. Emails as public records

Email messages that fall under the *Correspondence* category constitute public records and are subject to disclosure under Oregon Public Records Law. City employees are responsible for identifying and managing their job-related email correspondence in compliance with the City retention schedule and this set of policies as well as agency procedures.

If employees send or receive emails related to City business using a non-City computer or personal handheld device (such as cell phone or tablet), the emails, as well as the equipment itself, may be subject to search in the event of a public records request or litigation. If employees use non-City email accounts for correspondence related to City business, those communications are public records and subject

to discovery and/or disclosure.

3. Authenticity and Context of Email Records

Email messages must be maintained in a manner that preserves contextual information (metadata) and authenticity. An authentic email record should completely and accurately document the activity to which it pertains. It is unacceptable to save only the text in the body of the message and none of the sender/recipient information or attachments. Complete email records must include, at a minimum, all of the following elements, as applicable:

- Recipient(s), including any group list members
- Sender
- Subject Line
- Text of message itself
- Time and date sent
- Complete attachment(s), which should be included in full (not just indicated by file name)

4. Email accessibility and searchability

Email messages, including any attachments, must remain accessible and reproducible during their entire retention period. The messages must be searchable by multiple data elements, including sender, recipient(s), date sent or received, subject line, as well as by the text of the message itself and any attachments.

5. Working within the email application

It is each user's responsibility to identify and manage their job-related email records in compliance with City retention policy and agency procedures for maintaining record copy electronic records.

To prevent the loss of record copy emails, users must actively manage their incoming and outgoing correspondence. Email applications are intended to be used as message delivery systems, not record storage systems. Maintaining messages in the email application for a short time allows users to retrieve the message for reference or for replying or forwarding. However, no retention rules are applied to the messages and access is restricted to the holder of the email account. For these reasons, any emails that need to be retained for longer than 90 days must be actively managed.

Users should create subfolders within their Inbox that correspond to their job responsibilities. These subfolders can be organized by job function, project, location, or any other criteria that allows the user to identify the context of what is in the folder. When users either receive or send messages related to their responsibilities, they should file them in the appropriate folder. At least weekly, users must assess the

messages they have placed in their job-related subfolders and identify which email messages have a retention or reference value of longer than 90 days. These messages must then be migrated from the email application to a storage system that allows for the proper management of the record.

Agencies must establish procedures to ensure that electronic records are maintained in a storage environment that complies with authenticity, access, retrieval, retention and destruction requirements.

The Auditor's Office recognizes two compliant methods of managing City electronic records. They are described in Appendix I and Appendix II. Agencies must use one of these methods to comply with City recordkeeping requirements.

Summary of Responsibilities

Agency managers must ensure that employees are trained to identify and manage record copy electronic records, including emails, related to their job responsibilities, in compliance with this policy.

Each City employee is responsible for categorizing and maintaining electronic records related to their job responsibilities; and routinely cataloging those records using the appropriate storage method in use by the agency.

The Auditor's Office must provide regular training in electronic records and email management, including the use of approved electronic recordkeeping systems, or other storage methods.

The Auditor's Office must ensure continued preservation and access, in compliance with State requirements, to permanent-retention electronic records and emails within its electronic recordkeeping system.

Appendix I

City Enterprise Electronic Records Management System (Content Manager)

The Office of the City Auditor administers an electronic records management software system – known as Content Manager or Efiles – that meets reliability and authenticity standards, and applies retention requirements, security settings, access controls, structured context, and enterprise-wide searchability to appropriate records and emails within it.

Agencies that have access to the system and have received appropriate training from the Auditor's Office are to use Content Manager to manage all record copy City electronic records.

Implementation of the system within an agency is preceded by user training in public records responsibilities, basic records and email management principles, electronic filing system guidelines, and instruction on integrating the system with agency business practices.

Individual users are trained to integrate Content Manager with their existing email and desktop applications, so that record copy emails and other electronic documents can be easily filed within the system.

Appendix II

Approved Electronic Record Storage Procedures for Agencies Without Access to Content Manager System

Transitory or Convenience Copy Electronic Records

Convenience copies and non-record electronic documents should not be stored, but rather should be purged from network drives as soon as their reference value has expired. Agencies must establish procedures to monitor and regularly delete such information.

When users send or receive emails that are either transitory or for which they are not responsible for maintaining the record copy, they should delete them when the business need is eliminated.

Storage For Electronic Records With A Retention Period Shorter Than Five Years^[4]

1. Agency Business Applications

Certain agencies use specialized software applications for specific business functions, such as accounting, inventory control or project management. Agencies may store record copy City records with a retention period of less than five years within such a system provided that the system (with human intervention, if necessary):

- Is backed up daily
- Can retrieve the authentic record – with its contextual information and metadata intact – for the entire retention period
- Can identify, retrieve and delete records that have reached the end of their retention period
- Can document how these conditions are achieved (Note: these systems should not be used for storing emails unless they capture the complete, authentic message. It is not sufficient to simply cut and paste the text of the message into a text field within the application.)

2. Agency Network Drives

Agencies without access to the Efiles system may store record copy electronic records with a retention period of less than five years on network drives, provided that:

- The drive is backed up daily by Bureau of Technology Services.
- The agency maintains all software and hardware necessary to retrieve the record for its entire retention period.

- The agency establishes, monitors, and enforces the use of a classification system or taxonomy to file its electronic records. The classification system must be set up to preserve the business context in which the files were originally created, and each category within the system must correlate to the appropriate record series^[5] in the City retention schedule.
- The agency trains its employees in the use of the classification system for all record copy electronic records.
- The agency routinely identifies and purges records that have met their retention periods and submits annual reports of purged records to Archives & Records Management.
- The agency documents how these conditions are achieved. Agencies without access to Content Manager may also store emails on a network drive, provided they meet the conditions above and the emails are saved with an .msg file extension, which preserves the email in its native format. Record copy emails are not to be stored as .pst files. (Note: agencies and individuals are not to use the email application's "archiving" function to manage record copy emails because this function merely moves the emails to another unmanaged environment.)

3. Removable Media

Removable media, such as CDs, DVDs and flash drives are not appropriate for storing record copy City records. Agencies may not use them for that purpose.

Storage For Records with a Retention Period Five Years Or Longer

Agencies that intend to use agency business applications or agency network drives to store record copy electronic records with retention periods of longer than five years must contact Archives & Records Management for review and authorization of the planned system.

Permanent Records

Oregon law requires records with a retention period of 100 years or longer to be "retained in hard copy or on microfilm for the entire scheduled retention period"^[6]. Agencies that create permanent records must consult with Archives & Records Management to create a formal plan to manage these records.

Footnotes

[1] See Binding City Policy ARA-8.03 - Public Records Requests. Auditor's Office employees should consult the General Counsel of the Auditor's Office in the first instance.

[2]Record Copy – the single copy of a document, often the original, which is designated as the official copy to be preserved for the entire retention period

[3]This does not include Calendars, which do need to be retained per the retention schedule: permanently by elected officials, City Administrator, bureau heads, and other executive-level staff as determined by Archives & Records; and for 1 year by other City employees.

[4] Some retention periods are linked to a triggering event, such as the close of a contract term or the termination of an employee. When calculating how long a record needs to be retained, the time period leading up to the triggering event must be included. For example, if a particular kind of permit has a retention period of “3 years after expiration”, and the permit is in effect for 2 years, then the total “lifetime” of that record is 5 years.

[5]Record Series – a group of files or documents kept together (either physically or intellectually) because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, maintenance, or use.

[6] OAR 166-017-0045

Auditor’s Office Administrative Rule Information

Questions about this administrative rule may be directed to the [Archives & Records Management Division](#).

History

Ordinance No. 182637, passed by City Council April 1, 2009 and effective May 1, 2009.

Administratively renamed ARA-8.12 on December 6, 2022.

Adopted by the City Auditor on December 20, 2024, as interim rules, for a period of no greater than 180 days.

ARA 8.12 Management, Preservation and Storage of Electronic Records

A. Purpose

This policy gives City elected officials, the City Administrator, and agencies direction on complying with: Human Resources Administrative Rule 1.03 (Public Records Information, Access and Retention); Human Resources Rule 4.08 (Information Technologies); Auditor's Office Administrative Rule 3.04 (Employee Behavior and Expectations); and Code Chapter 3.76 (Public Records).

City Code provides in part:

3.76.050 Duties of Elected Officials, City Administrator, and Agencies.

City elected officials, the City Administrator, and agencies must:

1. Make and preserve records containing adequate documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency which are designed to furnish the information necessary to protect the legal and financial rights of the City and of persons directly affected by the agency's activities;
2. Ensure staff compliance with City records policies and procedures established by Archives & Records Management;

Although Code Section 3.76.010 B. refers to public records "regardless of physical form or characteristic," this rule focuses specifically on the management and preservation of records maintained in a digital or electronic form, including electronic mail correspondence (email). Since electronic records cannot be accessed, used, or stored without the aid of computer hardware, software, and storage media – all of which are subject to frequent obsolescence – special steps must be taken to preserve the reliability, authenticity, and accessibility of electronic records for the duration of their retention period.

B. Policies

Each agency must establish procedures to identify which electronic records constitute evidence of the agency's organization, functions, policies, decisions, procedures, and

essential transactions.

1. Not everything stored on a City computer or server meets the definition of a “record” for retention purposes. This policy is concerned with the management and preservation of records as described in Code Section 3.76.050, paragraph A. Agencies possess other electronically stored information that – although not a record as defined in Code Section 3.76.010 B. – is discoverable in the event of litigation or that may be subject to disclosure for a public records request. Consult the Office of the City Attorney for guidance on responding to litigation or to public records requests.¹
2. The focus of this policy is limited to those electronic documents, emails, or data collections that an agency or individual consciously regards as evidence of that agency’s “functions, policies, decisions, procedures, and essential transactions of the agency.”

Each agency must establish procedures to identify the record copy of its electronic records and assign recordkeeping responsibilities to specific positions.

1. Electronic records are easily copied and distributed. Once an agency establishes which electronic documents, data, and emails constitute evidence of its activities, it must then identify **which copy** is the one that will be maintained officially for retention purposes and assign responsibility for keeping it. This copy is known as the record copy.²
2. Agency management must identify which position within the agency is responsible for maintaining each category of that agency’s official City records. The individual that is responsible for a particular function, project, or program is required to maintain the official copy of all records, as well as internal and external email correspondence, both incoming and outgoing, related to that responsibility. If job responsibilities overlap or are shared as part of a work team, agency management must clearly delineate and assign specific responsibilities for maintaining electronic records and email correspondence

¹ See Binding City Policy ARA-8.03 - Public Records Requests. Auditor’s Office employees should consult the General Counsel of the Auditor’s Office in the first instance.

² Record Copy – the single copy of a document, often the original, which is designated as the official copy to be preserved for the entire retention period

and ensure that the assigned roles are understood.

3. This designation process is important because once the record copy has been identified and assignments have been made to preserve it, other copies (known as convenience copies) no longer need to be retained. As a responsible practice, agencies must establish procedures to remove convenience copies regularly from individual or network drives. Similarly, individuals not responsible for maintaining the record copy of sent or received emails may retain copies for informational purposes but should delete them as soon as possible. If the designated record copy is a paper record, it is acceptable to retain an electronic version for easy access – but as soon as the need for frequent access diminishes, these electronic convenience copies should be purged. If steps are not taken to identify record copy emails and electronic records and assign retention responsibilities for them, the City may find that no one retains these records or that everyone retains them. Neither of these scenarios is acceptable.

Each agency must establish procedures to regularly review the information kept on its individual or network drives.

1. To ensure that City records are being properly managed and preserved, each agency must establish policies and procedures directing employees to regularly review their electronic records residing on agency computer hard drives and network drives.
2. The purpose of this review is to:
 - a. Identify which files and emails constitute official records that must be retained per the City retention schedule.
 - b. Migrate official City records to a suitable storage repository together with sufficient indexing information or taxonomy to allow for proper retention and future retrieval of the records.
 - c. Determine which files are convenience copies or do not constitute official records and remove them from City network drives/servers.

Each agency must establish procedures to ensure that electronic correspondence (email) is properly managed and retained

1. Categorization of email records by subject matter content

It is not allowable under Oregon Administrative Rules to attach a single retention period to all emails (OAR 166-200-0200). Since the content of an email message can vary immensely – from a lunch invitation to a critical agency decision – the retention of email must be based on the content and context of the message and its attachments.

Not every email sent or received needs to be retained. The user must determine which of the following two categories the email falls under:

Transitory Information or Correspondence.

a. Transitory Information

Emails of short-term interest (90 days or less) that do not need to be retained once read or acted on if not necessary to satisfy legal, administrative, fiscal, tribal, cultural, or historical obligations of the City, as defined by ORS 192.005. Included are such records as:

- Routine requests for information or publications and copies of replies which require no administrative action, no policy decision, and no special compilation or research for reply
- Originating office copies of letters of transmittal that do not add any information to that contained in the transmitted material
- Quasi-official notices including memoranda and other records that do not serve as the basis of official actions, such as notices of office parties, holidays or charity fund appeals, and other similar records
- Records documenting routine activities containing no substantive information, such as routine notifications of meetings, scheduling of work-

related trips and visits, routine logistical information, and other scheduling related activities³

- Listserv messages
- Reading materials
- Reference materials
- FYI email information that does not elicit a response
- Unsolicited advertising

Emails that fall under the *Transitory* category should be deleted from the email system by the user as soon as any operational or informational value has expired.

b. Correspondence

Emails that directly relate to City programs, management, or administration. These include but are not limited to formal approvals, directions for action, communications about contracts, purchases, grants, personnel, etc; and correspondence relating to a particular project or program.

Email messages that fall under the *Correspondence* category must be managed as an official City record in a suitable storage environment.

2. Emails as public records

Email messages that fall under the *Correspondence* category constitute public records and are subject to disclosure under Oregon Public Records Law. City employees are responsible for identifying and managing their job-related email correspondence in compliance with the City retention schedule and this set of policies as well as agency procedures.

³ This does not include Calendars, which do need to be retained per the retention schedule: permanently by elected officials, City Administrator, bureau heads, and other executive-level staff as determined by Archives & Records; and for 1 year by other City employees.

If employees send or receive emails related to City business using a non-City computer or personal handheld device (such as cell phone or tablet), the emails, as well as the equipment itself, may be subject to search in the event of a public records request or litigation. If employees use non-City email accounts for correspondence related to City business, those communications are public records and subject to discovery and/or disclosure.

3. Authenticity and Context of Email Records

Email messages must be maintained in a manner that preserves contextual information (metadata) and authenticity. An authentic email record should completely and accurately document the activity to which it pertains. It is unacceptable to save only the text in the body of the message and none of the sender/recipient information or attachments. Complete email records must include, at a minimum, all of the following elements, as applicable:

- Recipient(s), including any group list members
- Sender
- Subject Line
- Text of message itself
- Time and date sent
- Complete attachment(s), which should be included in full (not just indicated by file name)

4. Email accessibility and searchability

Email messages, including any attachments, must remain accessible and reproducible during their entire retention period. The messages must be searchable by multiple data elements, including sender, recipient(s), date sent or received, subject line, as well as by the text of the message itself and any attachments.

5. Working within the email application

It is each user's responsibility to identify and manage their job-related email records in compliance with City retention policy and agency procedures for maintaining record copy electronic records.

To prevent the loss of record copy emails, users must actively manage their incoming and outgoing correspondence. Email applications are intended to be used as message delivery systems, not record storage systems. Maintaining messages in the email application for a short time allows users to retrieve the message for reference or for replying or forwarding. However, no retention rules are applied to the messages and access is restricted to the holder of the email account. For these reasons, any emails that need to be retained for longer than 90 days must be actively managed.

Users should create subfolders within their Inbox that correspond to their job responsibilities. These subfolders can be organized by job function, project, location, or any other criteria that allows the user to identify the context of what is in the folder. When users either receive or send messages related to their responsibilities, they should file them in the appropriate folder. At least weekly, users must assess the messages they have placed in their job-related subfolders and identify which email messages have a retention or reference value of longer than 90 days. These messages must then be migrated from the email application to a storage system that allows for the proper management of the record.

Agencies must establish procedures to ensure that electronic records are maintained in a storage environment that complies with authenticity, access, retrieval, retention and destruction requirements.

The Auditor's Office recognizes two compliant methods of managing City electronic records. They are described in Appendix I and Appendix II. Agencies must use one of these methods to comply with City recordkeeping requirements.

Summary of Responsibilities

Agency managers must ensure that employees are trained to identify and manage record copy electronic records, including emails, related to their job responsibilities, in compliance with this policy.

Each City employee is responsible for categorizing and maintaining electronic records related to their job responsibilities; and routinely cataloging those records using the

appropriate storage method in use by the agency.

The Auditor's Office must provide regular training in electronic records and email management, including the use of approved electronic recordkeeping systems, or other storage methods.

The Auditor's Office must ensure continued preservation and access, in compliance with State requirements, to permanent-retention electronic records and emails within its electronic recordkeeping system.

Appendix I

City Enterprise Electronic Records Management System (Content Manager)

The Office of the City Auditor administers an electronic records management software system – known as Content Manager or Efiles – that meets reliability and authenticity standards, and applies retention requirements, security settings, access controls, structured context, and enterprise-wide searchability to appropriate records and emails within it.

Agencies that have access to the system and have received appropriate training from the Auditor's Office are to use Content Manager to manage all record copy City electronic records.

Implementation of the system within an agency is preceded by user training in public records responsibilities, basic records and email management principles, electronic filing system guidelines, and instruction on integrating the system with agency business practices.

Individual users are trained to integrate Content Manager with their existing email and desktop applications, so that record copy emails and other electronic documents can be easily filed within the system.

Appendix II

Approved Electronic Record Storage Procedures for Agencies Without Access to Content Manager System

Transitory or Convenience Copy Electronic Records

Convenience copies and non-record electronic documents should not be stored, but rather should be purged from network drives as soon as their reference value has expired. Agencies must establish procedures to monitor and regularly delete such information.

When users send or receive emails that are either transitory or for which they are not responsible for maintaining the record copy, they should delete them when the business need is eliminated.

Storage For Electronic Records With A Retention Period Shorter Than Five Years⁴

1. Agency Business Applications

Certain agencies use specialized software applications for specific business functions, such as accounting, inventory control or project management. Agencies may store record copy City records with a retention period of less than five years within such a system provided that the system (with human intervention, if necessary):

- Is backed up daily
- Can retrieve the authentic record – with its contextual information and metadata intact – for the entire retention period
- Can identify, retrieve and delete records that have reached the end of their retention period
- Can document how these conditions are achieved (Note: these systems should not be used for storing emails unless they capture the complete, authentic message. It is not sufficient to simply cut and paste the text of the message into a text field within the application.)

⁴ Some retention periods are linked to a triggering event, such as the close of a contract term or the termination of an employee. When calculating how long a record needs to be retained, the time period leading up to the triggering event must be included. For example, if a particular kind of permit has a retention period of “3 years after expiration”, and the permit is in effect for 2 years, then the total “lifetime” of that record is 5 years.

2. Agency Network Drives

Agencies without access to the Efiles system may store record copy electronic records with a retention period of less than five years on network drives, provided that:

- The drive is backed up daily by Bureau of Technology Services.
- The agency maintains all software and hardware necessary to retrieve the record for its entire retention period.
- The agency establishes, monitors, and enforces the use of a classification system or taxonomy to file its electronic records. The classification system must be set up to preserve the business context in which the files were originally created, and each category within the system must correlate to the appropriate record series⁵ in the City retention schedule.
- The agency trains its employees in the use of the classification system for all record copy electronic records.
- The agency routinely identifies and purges records that have met their retention periods and submits annual reports of purged records to Archives & Records Management.
- The agency documents how these conditions are achieved. Agencies without access to Content Manager may also store emails on a network drive, provided they meet the conditions above and the emails are saved with an .msg file extension, which preserves the email in its native format. Record copy emails are not to be stored as .pst files. (Note: agencies and individuals are not to use the email application's "archiving" function to manage record copy emails because this function merely moves the emails to another unmanaged environment.)

⁵ Record Series – a group of files or documents kept together (either physically or intellectually) because they relate to a particular subject or function, result from the same activity, document a specific type of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, maintenance, or use.

3. Removable Media

Removable media, such as CDs, DVDs and flash drives are not appropriate for storing record copy City records. Agencies may not use them for that purpose.

Storage For Records with a Retention Period Five Years Or Longer

Agencies that intend to use agency business applications or agency network drives to store record copy electronic records with retention periods of longer than five years must contact Archives & Records Management for review and authorization of the planned system.

Permanent Records

Oregon law requires records with a retention period of 100 years or longer to be “retained in hard copy or on microfilm for the entire scheduled retention period”⁶. Agencies that create permanent records must consult with Archives & Records Management to create a formal plan to manage these records.

Auditor’s Office Administrative Rule Information

Questions about this administrative rule may be directed to the [Archives & Records Management Division](#).

Auditor’s Office Administrative Rule History

Ordinance No. 182637, passed by City Council April 1, 2009 and effective May 1, 2009.

Administratively renamed ARA-8.12 on December 6, 2022.

Adopted by the City Auditor on December 20, 2024, as interim rules, for a period of no greater than 180 days.

⁶ OAR 166-017-0045