

BPA Policy 236-14

Overview of Communication Tools

Compliance and Governance

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236-14.1 Purpose & Background

- A) This policy provides an overview for the agency’s communication tools that are capable of storing information assets in electronic form.
- B) BPA uses multiple electronic systems as communication tools to support its business functions. Because these systems are capable of storing data (see BPA Policy 236-12 Overview of Electronic Information Systems), IGLM has identified the electronic systems and devices listed in this policy as having the primary function of communicating rather than storing, maintaining, and managing data and recorded information. This policy ensures that all information assets created, captured or received by these technologies are stored and managed in compliance with the business objectives listed in BPA Policy 236-1 Information Governance & Lifecycle Management, and with applicable laws and regulations.

236-14.2 Policy Owner

The Vice President of Compliance Audit and Risk has overall responsibility for this policy. The Agency Records Officer within Agency Compliance and Governance develops, implements, and manages this policy on behalf of the Vice President of Compliance, Audit, and Risk.

236-14.3 Applicability

- A) This policy sets requirements for the use of BPA’s communication tools.
- B) The focus of this policy is on electronic systems and devices whose primary function is communicating or transferring rather than storing, maintaining, and managing data and information assets. This policy applies to the communication tools listed below:
 - 1) Email
 - 2) Electronic scheduling tools (e.g., Outlook Calendar, Tasks, Contacts, etc.)
 - 3) Collaboration tools (e.g., Office Communicator, Instant Messaging, Live Meeting, etc.)
 - 4) PDAs, Digital Cameras, and other portable devices
 - 5) Voicemail, videoconferencing, and voice recordings
 - 6) Web records and social media
 - 7) Faxes, printers, and scanners
- C) Policies specific to each type of system will be detailed in BPA Policy 236-200 series. In addition to these communication tools, there are other systems capable of storing data and recorded information. Policies for those systems are contained in BPA Policy 236-12 Overview of Electronic Information Systems. All communication tools are subject to BPA’s Code of Conduct, BPAM 1110 Use of Government Equipment, and BPA Information Technology Architecture (BITA).

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236-14.4 Terms, Definitions & Acronyms

A) As used in this policy, the following terms and definitions apply:

- 1) **Communication Tools:** Electronic systems and devices whose primary function is communicating or transferring information, rather than storing, maintaining or managing data and information assets (e.g. email, digital cameras, fax machines, PDAs, printers, and scanners).
- 2) **Discovery:** Disclosure of pertinent facts and information by parties to a legal action or proceeding.
- 3) **Electronic Information:** Recorded information in electronic format (requiring computer technology to retrieve or access); digital content. This definition includes both the content of the information asset and its associated metadata.
- 4) **Electronic Information System (EIS):** Computerized/digital means for collecting, organizing, and categorizing information to facilitate its preservation, retrieval, use, and disposition.
- 5) **Federal Record:** All recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them. Materials made or acquired solely for reference, extra copies of documents preserved only for convenience of reference, and stocks of publications are not included. - see Federal Records Act, 44 USC §3301.
- 6) **Information Asset:** Recorded information that has business value for BPA and must be managed throughout its lifecycle.
- 7) **Metadata:** Structured information about any recorded information such as date and time the recorded information was created, the author, organization or other data. This also includes descriptions of content, structure, data elements, interrelationships, and other characteristics of the data, information, and records as well as information asset profiles or indexing data.
- 8) **Native Format:** The form and medium (whether digital or physical) in which recorded information was originally created or received.
- 9) **Personal Storage Table (PST):** A personal file folder in Microsoft Outlook.
- 10) **Physical Media:** Any means for capturing recorded information in either human-perceivable format (e.g. paper, charts, books, etc.) or machine-readable, non-digital format (e.g., film, microfiche, video/audio tape, etc.)

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- 11) **Recorded Information:** Documents, information, and data — including writing, drawing, graphs, charts, photographs, sound recordings, images, and other data or data compilations — stored in any medium from which content can be obtained directly or, if necessary, after conversion into another usable form.
- 12) **Short-Term Record:** Information assets that may provide some evidence of the agency’s organization, functions or activities, but is in an incomplete or draft form. Short-term records have a retention period of no more than two years.
- 13) **Structured Electronic Information System (SEIS):** Electronic information systems (EIS) used by BPA to collect/maintain data or records in a structured format, typically a database. As part of the System Lifecycle (SLC) process, the IGLM team reviews and approves these systems for use at BPA. Electronic Recordkeeping Systems (ERKS) are a sub-set of SEIS that meet additional records compliance requirements.
- 14) **Transitory Recorded Information:** Recorded information with no continuing business value. This may also include recorded information made or acquired solely for reference, extra copies of documents preserved only for convenience, and stocks of publications. Transitory recorded information has a retention period of no more than ninety days.
- 15) **Web Records:** Federal records created in the course of conducting agency activities over web sites, which may include: HTML-encoded pages; records generated interactively on a web site; comprehensive lists of URLs referenced by a web site’s hyperlinks; web site design records; copyrighted web content and records documenting the use of such materials; web site program operation records; web site system software-related records; web site logs and statistical compilations; web site maps; and commercial-off-the-shelf (COTS) software configuration files. -see NARA Guidance on Managing Web Records

B) As used in this policy, the following acronyms apply:

- 1) **BITA:** BPA Information Technology Architecture
- 2) **EIS:** Electronic Information System
- 3) **IGLM:** Information Governance & Lifecycle Management
- 4) **IM:** Instant Message
- 5) **PDA:** Personal Digital Assistant
- 6) **PII:** Personally Identifiable Information
- 7) **PST:** Personal Storage Table
- 8) **SEIS:** Structured Electronic Information System

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236-14.5 Policy

- A) The communication tools described in this policy have the capability of storing information assets. However, because they are not effective in ensuring the integrity, security, and long-term availability of information assets, they shall not be used to maintain and manage Federal records. Moreover, information assets stored on communication tools are subject to the discovery process in litigation and can present challenges in appropriately placing legal holds, gathering, reviewing, and producing these information assets. All information assets stored on communication tools are considered either transitory or short-term and should either be disposed as such or, if a Federal record, moved into an Electronic Information System according to the prioritization outlined in BPA Policy 236-12 Overview of Electronic Information Systems (EIS) for maintenance and management.
- B) Organizations should regularly review their communication tools for information assets requiring disposition or migration to an EIS. Migrating information assets off an organization's communication tools includes assigning naming conventions and metadata that will identify the type of information assets being stored and includes retention periods.

236-14.6 Policy Exceptions

- A) Exceptions to this policy may be necessary based on legitimate business needs, legal or compliance requirements. Any exceptions must be documented, reviewed, and approved by the Office of Record, IGLM and IT.
- B) BPA allows for limited personal use of IT equipment (see BPAM 1110 Use of Government Equipment). Any recorded information created or received on agency communication tools that could be considered personal files must be deleted as soon as possible.

236-14.7 Responsibilities

- A) **Agency Records Officer:** Manages the IGLM program and develops, issues, and enforces policies for managing BPA's information assets through their lifecycle to ensure compliance, reduce risk, and improve operational effectiveness and efficiency.
- B) **IGLM Office:** Coordinates the overall IGLM program. Provides guidance and assistance to all BPA organizations with lifecycle management, and coordinates required records reviews, evaluations, and reports.
- C) **Information Technology Office:** Manages and maintains BPA's communication tools to ensure the integrity, security, and availability of information assets.
- D) **The Talent Sustainment Office:** Manages appropriate language governing voice recordings in Reasonable Accommodation agreements and ensuring that such recordings are properly disposed of under section 236-14.8.E.4.

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- E) **Managers/Supervisors:** Ensures the communication tools used by their organization are managed in a consistent manner to ensure the integrity, security, and availability of information assets.
- F) **BPA Employees/Contract Personnel:** Manages information assets throughout its lifecycle by appropriately using BPA’s communication tools in a consistent manner to ensure integrity, security, and availability.

236-14.8 Standards & Procedures

A) Email:

- 1) Because email is integral to the way in which the agency performs its business functions, special considerations are necessary to appropriately manage, maintain, and dispose of information assets in this medium. This section provides an overview: BPA Policy 236-260 Email Systems, provides details, procedures, and guidance to users for managing email. It also provides IGLM system administration standards and technical requirements for email, including the Exchange servers.
- 2) Email is managed based on content; if the content of an email, including its attachments, meets the definition of a Federal record it must be maintained for the full retention period and appropriately disposed of once the retention period is over. In order to accomplish this, Federal records are moved as soon as practical out of the email system in their original (“native”) format. Any such email must be moved to an organization’s EIS i.e., an approved Structured Electronic Information System (SEIS), SharePoint site or a shared drive. Transitory recorded information or short-term records in email may be managed and disposed of solely within the email system. The BPA email system shall not be used to maintain Federal records.

B) Electronic Calendaring and Organization Tools:

- 1) BPA uses Microsoft Outlook, which includes electronic tools to help employees manage and organize their day-to-day work: Calendar, Contacts, Tasks, Notes, and Journal. In addition to these extensions to the email system, BPA offers alternative calendaring and organization tools with another EIS. Information assets entered into these systems are considered short-term records, with the exception of the calendars of senior officials (see paragraph 3 below). Attachments to appointments or tasks are treated as convenience copies; if an attachment meets the definition of a Federal record it is maintained separately in a preferred EIS.
- 2) The general rule for Calendar entries and schedules is to comply with the mailbox default retention policy (see 236-14.8.A.2). However, calendar entries cannot be tagged by users to modify the retention period. As short-term records, the information should not reside in the email system beyond two years from the occurrence of the scheduled calendar date. In the case of recurring meetings the system will not show the meeting as expired until the end-date of the last occurrence. BPA discourages the practice of creating repeating calendar entries in

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excess of 2 years. Multi-year recurring meetings have the effect of retaining information past the appropriate retention periods.

- 3) The exception to the general rule is for the Outlook calendars of senior officials at BPA. A senior official is defined as a BPA executive in the Senior Executive Service including the Administrator, Deputy Administrator, Chief Operating Officer, Chief Administrative Officer and all Executive Vice Presidents, and Vice Presidents identified on the [BPA Organizational Chart](#).
- 4) **Task, Note, and Journal** entries comply with the mailbox default retention policy (see above). Tasks are similar to calendar entries where recurring tasks are possible. A recurring task expires based on the last occurrence date. However, task entries cannot be tagged by users to modify their retention periods. As short-term records, the information should not reside in the email system beyond two years from either the date the entry was created, or the scheduled due date, whichever is later.
- 5) **SharePoint and EIS calendars** are treated as short-term records unless calendar entries in these systems are identified as Federal records through the SEIS scheduling process. If a calendar system is used to store Federal records, that system must be described and scheduled as any other SEIS using form BPA F1324.02e.

C) **Collaboration Tools:** BPA uses instant messaging and online meeting tools (such as Microsoft Office Communicator and Microsoft Live Meeting) to assist employees in collaborating with each other. These applications are capable of recording data and information. Therefore, they are managed as follows:

- 1) **Instant Messaging:** Instant messaging (IM) is considered transitory recorded information and should not be used in such a way as to create Federal records. If an IM user determines that content is a Federal record, it must be migrated from Office Communicator into an EIS suitable for Federal records.
- 2) **Live Meeting:** Because Live Meeting allows for real time sharing and revision of information assets, Live Meeting users must ensure that short-term or Federal records created in this medium are immediately migrated from Live Meeting into an EIS suitable for Federal records.

D) **Portable Digital Devices:**

- 1) **Portable Devices (including PDAs, Smart Phones, etc.)** should be used primarily for communication and should maintain only the minimum information assets needed to perform work responsibilities. These devices pose a security risk because of the potential for loss or theft when they are taken offsite, particularly if a device contains Personally Identifiable Information (PII). IT shall not issue such devices without proper encryption and authentication mechanisms. Users must ensure devices are locked when not in use.

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- 2) **Digital Cameras:** The main purpose of digital cameras is the capture and storage of data in visual formats; however, cameras should be used primarily as a means to capture data and not for storing that data. Move images and data to an agency EIS suitable for maintaining short-term or Federal records and then delete them from the cameras.

E) Voicemail, Video Conferencing and Voice Recordings

- 1) **Voicemail:** Voice mail messages should be immediately deleted (if transitory recorded information) or, if a short-term or Federal record, transcribed and then deleted from the voicemail system. Transcription into electronic format is preferred; the transcription should be maintained in an EIS. Transcription to physical media requires maintaining it in an appropriately managed file system, organized according to content.
- 2) **Videoconferencing:** Video conferencing should either be immediately deleted (if it is transitory recorded information) or captured in an accessible native format and stored in an agency EIS suitable for maintaining Federal records.
- 3) **Voice Recordings:** To the extent that voice recordings of conversation (e.g., Help Desk, Power Scheduling, Transmission Scheduling, etc.) are authorized by law, regulation or BPA policy, they shall be considered Federal records and must be maintained according to the retention schedule for records of the underlying function in accessible, native format and stored in an agency EIS suitable for maintaining Federal records.
- 4) **Voice Recordings — Reasonable Accommodation:** Oral conversations, meetings or other activities may be recorded for reasonable accommodation purposes if included as part of a signed Reasonable Accommodation Agreement between an employee/contractor and BPA. The Talent Sustainmnet organization is responsible for such agreements. Reasonable Accommodation voice recordings are treated as Transitory Recorded Information and must be disposed after the employee/contractor has made use of the recording content or within 90 days of the recording, whichever is sooner.

F) Web Records, Social Media, and Web 2.0

- 1) Content provided through these technologies should only be convenience or reference copies of Federal records. The organization responsible for the underlying Federal record (the Office of Record) retains accountability for managing those records.
- 2) BPA Policy 236-281 Web Records – BPA.gov [*to be drafted*] provides details, procedures, and guidance as well as IGLM system administration standards and technical requirements for BPA’s public Web site, www.bpa.gov. For the purposes of this policy, BPA’s internal SharePoint sites are not considered web records.

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- 3) Organizations that use other external Web sites (e.g., Google Maps) to support or enhance business operations must ensure that any Federal records created as a result are migrated to an agency EIS suitable for maintaining Federal records. External web sites are not to be used to store, maintain or manage Federal records.
 - 4) The Public Affairs Office has responsibility for policies on using or providing information through social media (see BPAM 1140 Use of Social Media/Web 2.0 Tools). With the approval of the Public Affairs Office, certain organizations may make use of specific social media in support of their business functions (e.g., professional online community sites). Users of these sites must be approved and trained to identify and maintain Federal records that may result from their online activities.
- G) Imaging Equipment (Faxes, Printers, and Scanners):** Information assets may be captured and saved on imaging equipment as part of its functionality. All information assets on imaging equipment are considered transitory with a maximum retention of 90 days. While each system has built-in capacity limitations that result in the automatic deletion of the information assets, users should regularly clear the equipment’s cache to ensure compliance with the 90-day retention policy.

236-14.9 Performance & Monitoring

- A) The IGLM team within Agency Compliance and Governance is the responsible organization for the performance standards and monitoring plans contained in this chapter.
- B) **Performance Standards**
 - 1) Reduction in total content found on communication tools.
 - 2) Reduced duplication, and increased accessibility of information assets by authorized users.
- C) **Monitoring Plans**
 - 1) Regular review of permissions for access to communication tools.
 - 2) In collaboration with IT stakeholders, regular compliance reviews of the management of information assets on communication tools including migration of data and recorded information off the communication tools to appropriate EIS for maintenance and disposition.
 - 3) Monitoring through use of information technology.

236-14.10 Authorities & References

- A) 18 USC 2071: Criminal sanctions for unauthorized removal/destruction of Federal records

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- B) 44 USC 3102: Establishing agency programs for management of, effective controls over, and appropriate disposal of records of temporary value
- C) 44 USC 3105: Establishing safeguards against removal/loss of Federal records
- D) 36 CFR 1220-1239: Federal Records Management, general
- E) 36 CFR 1236.20: NARA regulations on email
- F) DOE Order 0243.1A: DOE Records Management Directive (guidance)
- G) DoD 2015.2: Standard for systems maintaining Federal records
- H) BPAM 1101: Information Technology Policies
- I) BPAM 1110: Business Use of BPA Information Technology Services
- J) BPAM 1140: Use of Social Media/Web 2.0 Tools
- K) BPA Policy 236-1: BPA IGLM program authorization

236-14.11 Review

The IGLM team within Governance and Internal Controls is the responsible organization for this policy. This policy is reviewed on a three-year cycle beginning in 2015. All IGLM Manual policies are reviewed when revisions are introduced to BPA Policy 236-1 Information Governance and Lifecycle Management or other policies governing information management. Editorial updates to the policy and attachments may be made without IGOT and Policy Working Group review and approval.

236-14.12 Revision History

Version	Issue Date	Description of Change
2012-1	2012-11-05	Published completed original chapter, cmfrost.
2013-1	2013-09-03	Published revisions to "Voicemail, Videoconferencing and Voice Recordings", cmfrost.
2015-1	2015-06-30	Migration to new BPA policy format.

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