

PTM <i>Policy Manual</i>	Section:	Information Technology
	Policy #:	IT CWI 12-2024 V1
	Subject:	CMS Web Interface Electronic Communication Retention Policy
CROSS-REFERENCES:		
IT Security and HIPAA Compliance Policy		
CWI Electronic Communications Policy		

PURPOSE & OVERVIEW

The Electronic Communication Retention Policy is intended to help employees working on CMS Web Interface (CWI) abstraction determine what information sent or received by e-mail or other electronic means should be retained, where it should be retained, and for how long.

POLICY GUIDELINES

The information covered in these guidelines includes, but is not limited to, information that is either stored or shared via electronic messaging and communication technology including e-mail, instant messaging, collaboration tools like Microsoft Teams, PTM P.DAT system, text messaging, etc. (Electronic Communications). Electronic Communications can be on PTM maintained and controlled Electronic Communication systems, PTM Communication and Information Systems (PCIS) or on user maintained and controlled Electronic Communication systems such as text messaging.

Types of Electronic Communications

Most Electronic Communications is created primarily for routine communication or information exchange. These Electronic Communications should be considered transitory without lasting value and should be:

1. Read and promptly deleted; or

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2. Read and retained on the Electronic Communication system for no longer than the default retention period or until their usefulness has ended (whichever occurs first), and then promptly deleted.

Examples of transitory Electronic Communications include;

- Notices about meetings or events
- Internal request for information
- An inquiry about department programs or scheduling issues
- Announcements, etc.

When the contents of an Electronic Communications exhibit one or more of the following characteristics, it should be classified as having lasting value:

1. Has operational value (required by a department to perform its primary function)
 - a. Administrative actions taken or planned
 - b. Reports or recommendations
 - c. Policies, procedures, guidelines, templates
 - d. Retention required by customer contract
 - e. Retention needed to deliver services
2. Has legal or evidential value (required to be kept by law)
 - a. Falls within a litigation hold or internal investigation
3. Has fiscal value (related to financial transactions)
 - a. Required for financial reporting and audits
4. Has historical significance (of long-term value to document past events)
 - a. May arise from exceptional age and/or some significant historical event
5. Has vital value (critical to maintain to ensure operational continuity after a disruption or disaster)
 - a. Vital records or information may fall into any one of the above value categories.

Electronic Communication Retention Policies

Electronic Communications that have lasting value should:

- Be moved to the location in a PCIS and
- Not be stored within an individual user's Electronic Communication storage such as folders, file directories or text messages.

If the Electronic Communication contains a file attachment that is considered to have 'lasting value', the attachment can also be saved to the appropriate storage location on PCIS.

Our policy is that for data stored in PCIS PTM will make reasonable efforts to maintain this data based on the contract with the PTM client. If not specified, PTM will make reasonable efforts to maintain this information for ten (10) years. Electronic Communications that do not have lasting

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value should be deleted as soon as possible and when possible, will be automatically deleted after eighteen (18) months.

To implement this policy PCIS will, when possible, be configured to automatically delete Electronic Communications retained for more than eighteen (18) months. This auto-delete policy applies to Electronic Communications within all folders (inbox, folders, sent file folders, draft file folders, etc.) and storage locations in PCIS such as e-mail and Microsoft Teams.

PCIS will also, when possible, be configured to automatically delete Electronic Communications that have been marked for deletion by users but are still sitting in their “deleted items” or similar folders or storage areas for more than seven (7) days.

Backups of Electronic Communications

PTM maintains backups from PCIS, through the cloud-based system vendor or directly. These backups will not be kept for over eighteen (18) months.

Responsibility for Retention of Electronic Communications with Lasting Value

The burden of determining whether a specific Electronic Communication has lasting value falls with the department responsible for that particular class or series of records – typically the originator or custodian of those records. Other recipients should not retain Electronic Communications longer than required for their respective job purposes. When the need no longer exists, the information should be destroyed.

Questions about proper classification (transitory or lasting value) of a specific Electronic Communication, record or piece of information should be directed to the employee’s supervisor or the Corporate Compliance Officer.

Litigation Holds

When litigation is pending or threatened against PTM or its employees, the law imposes a duty upon PTM to preserve all documents, records, and Electronic Communications that pertain to the issues. A litigation hold directive must be issued to the legal custodians of those documents.

A litigation hold directive overrides this Electronic Communications retention policy, as well as any retention schedules that may have otherwise called for the transfer, disposal, or destruction of relevant material, until the hold has been cleared.

Electronic Communications accounts of separated employees that have been placed on litigation hold status must be maintained by the IT Department until the hold is released.

No employee or other PTM staff who has received a litigation hold directive may alter or delete Electronic Communications that falls within the scope of that hold. Those staff are required to

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provide access to or copies of any Electronic Communications regardless of location including downloaded or moved to some other storage account or device.

Roles and Responsibilities

All users are expected to:

1. Regularly check for new Electronic Communications,
2. Routinely move Electronic Communications with lasting value to the correct location in the PCIS, and
3. Delete transitory Electronic Communications as quickly as possible.

The IT Department is responsible for:

1. Administering the Electronic Communications retention process
2. Responding to questions regarding these guidelines
3. Providing the required end user training and helpdesk support
4. Managing Electronic Communications implementations of litigation holds
5. Suspending automatic deletion processes, as necessary to preserve specific Electronic Communications, records and information that fall within the scope of the litigation hold and that reside on PTM systems.

Questions about these guidelines should be addressed to the PTM Compliance Officer.

To ensure the default retention can be maintained, when possible, e-mail and similar Electronic Communication archiving has been disabled and, when possible, systems will be scanned regularly to ensure adherence to these policies.

Department management and supervisors are responsible for:

1. Providing records retention guidance to staff within their respective departments.

Originators and custodians of Electronic Communications, records, and information that have lasting value are responsible for:

1. Appropriately identifying and retaining such Electronic Communications in accordance with this policy; and
2. Seeking assistance from their respective department director or manager when unsure about how to categorize specific types of Electronic Communications.

Employees who have been notified by management of a litigation hold are responsible for:

1. Preserving all Electronic Communications and information that fall within the scope of the hold that they have downloaded and/or stored locally.

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Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Policy Revisions

This policy is subject to revision in response to changes in technology or PTM operational initiatives.

Process Owner	Chief Information Officer
Department	Information Technology
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APPROVED BY: CHIEF OPERATING AND INFORMATION OFFICER, MANAGER OF CMS WEB INTERFACE PROGRAMS, MANAGER OF IT OPERATIONS, AND IT SYSTEM ADMINISTRATOR	12-01-2021