

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

CIO 1828.2
October 27, 2021

GSA ORDER

SUBJECT: Email Retention Policy

1. Purpose. This policy provides guidance for implementing and managing the records retention of General Services Administration's (GSA) email messages and attachments as required by [OMB M-19-21, Managing Government Records Directive](#), and the [Federal Records Act, as amended](#).
2. Background.
 - a. OMB M-12-18, *Managing Government Records Directive (rescinded and now incorporated into OMB M-19-21)* provided that "[b]y 2016, Federal agencies will manage both permanent and temporary email records in an accessible electronic format."
 - b. GSA scheduled two types of email records based on the role of the email account user. The schedule was submitted to the National Archives and Records Administration (NARA) in November 2016 and approved by the Archivist of the United States on May 30, 2017.
 - c. This Order provides guidance on how determinations are made regarding the retention and management of e-mail.
 - d. This Order does not eliminate the requirement that employees maintain complete recordkeeping files with the inclusion of records created or received in email.
3. Cancellation. This Order cancels and supersedes [OAS 1828.1, Email Records Management Policy](#), dated March 9, 2018.
4. Revisions. The following updates have been made:
 - a. Updated to reflect versioning and the moving of the Records Management Program from the Office of Administrative Services to the Office of the Chief Information Officer;

b. Revised name from Email Records Management Policy to Email Retention Policy to reflect the purpose more clearly;

c. Clarified that this order does not eliminate the requirement that employees maintain complete recordkeeping files with the inclusion of records created or received in email; and

d. Updated outdated links and references.

5. Applicability. This Order applies to all GSA employees, political appointees, contractors, and other individuals who possess a GSA-supported email account or a GSA-supported shared account associated with that individual. In addition, this applies to group accounts and organization accounts not specifically associated with individuals.

a. The Office of Inspector General (OIG) is exempt from this Order. The OIG has set up its own email records management policy, using the same GSA records schedule for its email system.

b. This Order applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the Contract Disputes Act.

c. This Order does not supersede any elements of GSA Directive [CIO 1820.2 Records Management Program](#). This Order does not eliminate the requirement that employees maintain complete recordkeeping files with the inclusion of records created or received in email.

6. Explanation of the GSA Email Records Schedule. GSA manages email records based on the role of the email account user rather than on the content of each email record.

a. High-Level Officials. GSA positions which have one or more of the following roles are considered High-Level Official positions:

(1) Approves final financial plans, strategic plans, policies, and/or program plans for the agency, or a program office within the agency

(2) Approves high-level decisions at the agency or a program office within the agency such as:

(a) Financial decisions such as allocating budgets, transferring funds and resources, obligating funds, and changing previously approved budgets and funding levels, or

(b) Program planning decisions related to goal and mission setting. Also included are approving the creation of new organizational units, changes to programs, and discontinuing services and programs that GSA previously supported.

(3) The Office of Human Resource Management (OHRM) determines which positions are defined as a High-Level Official when a new position is created or reclassified.

(4) The following positions have been designated as High-Level Official positions, (whether one is acting or permanently in the position):

- (a) Administrator;
- (b) Deputy Administrator;
- (c) Heads of Services and Staff Offices (HSSOs) and their Deputies;
- (d) All other Senior Executive Service (SES) and Senior Leadership (SL) level employees; and;
- (e) All Schedule C employees.

(5) A list of individuals designated as High-Level Officials and their email account information is sent to NARA and GSA IT to update email retention rules for those email account holders.

b. Email Records Retention. The following records retention schedules apply:

(1) High-Level Officials. Sent and received email and associated attachments for High-Level Officials are considered “permanent” records. These records will be decommissioned after 15 years, and then transferred to NARA electronically for retention.

(2) All Other GSA Employees and Contractors. Sent and received emails and associated attachments will be retained for 7 years and destroyed at the end of each fiscal year at the end of the 7th year. If users feel that any email needs to be kept longer than 7 years, they must take action to save a copy of that email in a system outside of GSA’s email system. To save email, users can convert them to PDF and store them on Google Drive for personal reference. See more at this link:

<https://insite.gsa.gov/employee-resources/information-technology/do-it-yourself-self-help/google-g-suite-apps/google-gmail/gsa-email-management/saving-email-to-pdf>

(3) Litigation Holds. Email records held for litigation or investigative purposes will be retained until the investigation is completed. At the end of the fiscal year, when the litigation hold is lifted, email records greater than 7 years or 15 years, as applicable, shall be destroyed or transferred to NARA. Otherwise, email records that have not reached their 7 or 15 year retention requirement, as applicable, after the litigation hold is lifted, will be retained, destroyed, or transferred to NARA as scheduled.

(4) Business Reference Use Extension. Users are reminded and encouraged to regularly review email retained for business reference use to determine if there is still a business need to retain the email or if it may be destroyed. If a user feels that specific

email needs to be preserved longer than the 7 or 15 years (for High Level Officials), then that user may retain specific email for business reference use. GSA users can find details about how to retain specific email for business reference use at this link:

<https://insite.gsa.gov/employee-resources/information-technology/do-it-yourself-self-help/google-g-suite-apps/email-with-gmail/gsa-email-management-process>

7. Exceptions. Exceptions to this policy must be in the form of a federal regulation or a presidential executive order. If there are positions that are considered exempt from this policy, such exemption must be approved by the Email Records Governance team. The Email Records Governance team is composed of representatives from OHRM, the Office of General Counsel, and GSA IT (appointed by the heads of these offices as necessary) and will be convened and managed by the Agency Records Officer to confirm and document the decision to exempt the position from this policy. The Agency Records Officer shall be contacted at records@gsa.gov to start such a review.

8. Authorities.

- a. [44 U.S.C. Chapters 21, 29, 31, and 33](#)
- b. [36 CFR Chapter XII](#), Subpart B – GSA Records Management Responsibilities
- c. [36 CFR Chapter XII](#), Subparts B and C – Electronic Records Management
- d. [OMB M-12-18, Managing Government Records Directive](#)
- e. [OMB M-19-21, Transition to Electronic Records](#)
- f. [CIO 2160.2B CHGE 4 GSA Electronic Messaging and Related Services Policy](#)

9. Signature.

/s/ _____
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