



**Natural Resources Board**

Chair

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**Records and Information Management Policy and Guidelines**

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## 1. PURPOSE

This policy is to ensure that all employees and appointees of the Natural Resources Board (hereafter, the “Board”) conform to state and federal laws and regulations regarding the management and disposition of records.

## 2. POLICY STATEMENT

It is the Board’s policy to comply with 1 V.S.A. Chapter 5, Subchapter 3 (often referred to as “Vermont’s Public Records Law”) and to adhere to the records management guidelines and best practices established by the Vermont State Archives and Records Administration (VSARA).

The Board shall manage all written or recorded information, regardless of physical form or characteristics, including electronic or digital records and data, in accordance with record schedules approved by the Vermont State Archivist. This includes all records and information created, received, managed, and/or stored in the Board’s content management systems and electronic storage locations. The Board shall not destroy any records created or received in the course of business unless destruction has been authorized through a record schedule described in this policy.

Consistent with the policies of the State of Vermont, the Board recognizes that:

[P]ublic records are essential to the administration of State and local government. Public records contain information that allows government programs to function, provides officials with a basis for making decisions, and ensures continuity with past operations. Public records document the legal responsibilities of government, help protect the rights of citizens, and provide citizens a means of monitoring government programs and measuring the performance of public officials. Public records provide documentation for the functioning of government and for the retrospective analysis of the development of Vermont government and the impact of programs on citizens. Public records in general and archival records in particular need to be systematically managed to preserve their legal, historic, and informational value, to provide ready access to vital information, and to promote the efficient and economical operation of government.

3 V.S.A. § 218(a). *See also* 1 V.S.A. § 315(a) (containing substantially similar provisions).

As a result, the Board adopts as its own the following two polices from 1 V.S.A. § 315:

- First, that the Board’s employees shall provide for free and open examination of records consistent with Chapter I, Article 6 of the Vermont Constitution and Vermont’s Public Records Act (1 V.S.A. §§ 315-320).
- Second, that all people have a right to privacy in their personal and economic pursuits, which ought to be protected unless specific information is needed to review the action of a governmental officer (1 V.S.A. § 315(a)). This means that public records that are exempt under Vermont’s Access to Public Records law may not be available for public inspection.

## 3. APPLICABLE LAW

- A. [Vermont State Constitution, Chapter 1, Article 6](#)
- B. [1 V.S.A. §§ 315-320: Public Records Act](#), including 1 V.S.A. § 317a: Disposition of Public Records
- C. [3 V.S.A. § 117: Vermont State Archives and Records Administration](#)
- D. [3 V.S.A. § 218: Agency/Department Records Management Program](#)
- E. [04 000 CVR 002: Uniform Schedule of Public Record Charges for State Agencies](#)
- F. [VSARA’s Forms & Procedures Resource Page](#)
- G. [10 V.S.A. Ch. 151: Act 250](#)
- H. [10 V.S.A. Ch. 201: Administrative Environmental Law Enforcement](#)
- I. [10 V.S.A. Ch. 220: Consolidated Environmental Appeals](#)

#### **4. BOARD RECORDS ROLES AND RESPONSIBILITIES**

The Board Chair shall designate a Records Officer to oversee the Board's records management program including the Board's Records and Information Management (RIM) Steering Committee (3 V.S.A. § 218). The Records Officer may appoint division Records Liaisons.

#### **5. RECORD SCHEDULES**

General and Agency-Specific Record Schedules (GRSs and SRSs, respectively), as approved by the Vermont State Archivist and issued to the Board by VSARA, govern the life cycle management, retention, and disposition of public records produced or acquired in the course of Board business. The most recent versions of the [Board's SRSs](#) are publicly available and posted online on VSARA's website.

#### **6. PUBLIC RECORDS REQUESTS (APPENDIX A)**

The Board provides access to records and information in accordance with the Public Records Act (PRA). All Board employees and appointees are required to be familiar with the PRA and the Secretary of State's rule Uniform Schedule of Public Records Charges for State Agencies (CVR 04 000 002) to ensure compliance and to be able to effectively advise and educate the public of the PRA when responding to public records requests and charges for copies.

Essential provisions of the PRA that all Board employees and appointees are required to know are outlined in Appendix A, including a standard certification for records and information that are exempt from public inspection and copying.

#### **7. RECORDS AND INFORMATION MANAGEMENT GUIDELINE (APPENDIX B)**

The Records and Information Management (RIM) Guideline incorporated into this policy as Appendix B shall be used for the systematic management of records within the Board. The Board's divisions are authorized to develop their own internal policies and procedures for applying SRSs. Under no circumstances shall any division's internal policies and procedures differ from the requirements specified in the SRS. Any internal policy or procedure for applying SRSs must be approved by the Board's Records Officer. In the event a division has not developed an internal policy, employees shall follow the RIM Guideline.

#### **8. INFORMATION TECHNOLOGY GUIDELINE (APPENDIX C)**

All information technology applications and programs used during Board business to produce or acquire written or recorded information, regardless of physical form or characteristics, shall support the Board's compliance with the PRA and the statewide RIM program.

The Information Technology Guideline incorporated into this policy as Appendix C provides a comprehensive listing of standard applications and programs approved for use by the Board. In the event an application or program used during Board business does not readily support the Board's ability to comply with the PRA and/or the statewide RIM program, it shall be noted in the Information Technology Guideline.

The Board's RIM Steering Committee shall maintain an accurate and current inventory of all applications and programs deployed by the Board.

#### **9. REVISION HISTORY**

This policy supersedes any Board policies, guidelines, procedures, and practices in existence prior to its

effective date that address records retention and management. The Board Chair reviewed and approved this policy on July 30, 2024. This policy amends the policy that the Board Chair reviewed and approved on May 11, 2021.

The next annual review date is July 30, 2025.

| <b>Date</b> | <b>Revision #</b> | <b>Modification</b>  |
|-------------|-------------------|--|
| 2019-11-21  | 1.0               | New policy approved by the Board Chair.  |
| 2020-03-10  | 2.0               | Revised to include updated SRS for transitory and new SRS for enforcement records. |
| 2020-04-13  | 3.0               | Revised to direct the audience to VSARA’s new Forms and Procedures page.           |
| 2021-03-09  | 4.0               | Revised to affirm agency election to not adopt a land use permit record schedule.  |
| 2021-05-11  | 5.0               | Revised to appoint new Records Officer.  |
| 2022-04-04  | 6.0               | Revised to correct Records Officer email address.                                  |
| 2024-07-30  | 7.0               | Revised to follow VSARA’s standardized template and add links to SRSs.             |
| 2024-09-19  | 7.1               | Revised to update email addresses and change Teams Automation status to live.      |
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## APPENDIX A: PUBLIC RECORDS REQUESTS

The following are essential provisions of the Public Records Act that underpin the Board’s response to public records requests.

In case of an emergency that arises in the workplace, pursuant to 1 V.S.A. § 316(j), which states that public agencies may make reasonable rules to prevent disruption of operations, to preserve the security of public records or documents, and to protect them from damage, Board divisions shall defer to incident management protocols in the Emergency Procedures Plan (EPP) for their respective buildings.

| Legal Requirement  | Citation  |
|--|---|
| A “public record” or “public document” means any written or recorded information, regardless of physical form or characteristics, which is produced or acquired in the course of Board business.   | 1 V.S.A. § 317                                    |
| Any person may inspect or copy any public record of a public agency during customary business hours.   | 1 V.S.A. § 316                                    |
| Motive is irrelevant to any person’s right to inspect or copy any public record of a public agency.  | <i>Finberg v. Murnane</i> , No. 91-485 (Vt. 1992) |
| Records must be promptly produced for inspection or copying. If the record is in active use or in storage, the Board must promptly certify this fact in writing and, in the certification, set a date and hour within one calendar week of the request when the record will be available.  | 1 V.S.A. § 318                                    |
| The Board may make reasonable rules to prevent disruption of operations, to preserve the security of public records or documents, and to protect them from damage.   | 1 V.S.A. § 316                                    |
| If a record does not exist, the Board shall promptly certify in writing that the record does not exist under the name given to the Board by the applicant or by any other name known to the Board.   | 1 V.S.A. § 318                                    |
| Certain public records are exempt from public inspection and copying.  | 1 V.S.A. § 317                                    |
| If the Board considers the record to be exempt from inspection and copying, the Board shall promptly so certify in writing. The certification shall: identify the records withheld; include the asserted statutory basis for denial and a brief statement of the reasons and supporting facts for denial; provide the names and titles or positions of each person responsible for denial of the request; and notify the person of his or her right to appeal to the Board Chair any adverse determination.  | 1 V.S.A. § 318                                    |
| The shall not withhold any record in its entirety on the basis that it contains some exempt content if the record is otherwise subject to disclosure; instead, the Board shall redact the information it considers to be exempt and produce the record accompanied by an explanation of the basis for denial of the redacted information.  | 1 V.S.A. § 318                                    |
| In responding to a request to inspect or copy a record, the Board shall consult with the person making the request in order: to clarify the request; and obtain additional information that will assist the public agency in responding to the request and/or facilitating production of the requested record for inspection or copying. The Board may request that a person seeking a voluminous amount of separate and distinct records narrow the scope of a public records request.  | 1 V.S.A. § 318                                    |
| If the Board has the equipment necessary to copy its public records, the Board shall utilize its equipment to produce copies. If the Board does not have such equipment, the Board is not required to provide or arrange for copying service; to use or permit the use of copying equipment other than its own; to permit operation of its copying equipment by other than its own personnel; to permit removal of the public record by the requesting person for purposes of copying; or to make its own personnel available for making handwritten or typed copies of the public record or document requested. | 1 V.S.A. § 316                                    |

| Legal Requirement  | Citation       |
|--|----------------|
| If a person making the request has a disability which requires accommodation to gain equal access to the public record sought, the person shall notify the Board of the type of accommodation requested. The Board shall give primary consideration to the accommodation choice expressed by the requestor but may propose an alternative accommodation so long as it achieves equal access. The Board shall provide accommodation to the person making the request unless the Board can demonstrate that accommodation would result in a fundamental alteration in the nature of its service, programs, or activities, or in undue financial and administrative burden. | 1 V.S.A. § 318 |

**1. Responding to Public Records Requests**

For routine land use permit record requests received at district offices, district employees shall continue to fulfill such requests as they always have, which is described in Section A below. For all other public records requests, employees and appointees shall consult with the Board’s Legal Counsel and Records Officer as necessary prior to responding to the requestor. Upon consultation, Board employees and appointees shall respond as directed.

Board employees who receive a Public Records Request:

- A. may respond to the public records request without further consultation with the Records Officer, General Counsel, or Associate General Counsel if:
  - i. the requested record(s) is publicly available on the Board’s website, including the Act 250 Database; **or**
  - ii. the requested record(s) located in a land use permit file is General in nature. If there is any question whether a document in the file is exempt in full or in part, contact the Records Officer, General Counsel, or Associate General Counsel for guidance; **and**
  - iii. the requested record(s) may be compiled and provided to the requestor within 3 business days of receiving the request according to 1 V.S.A. §§ 318(a)(1) [or, in extenuating circumstances, as prescribed in 1 V.S.A. §§ 318(a)(5)(A)-(C), up to but no longer than 10 business days] and without incurring a fee under 1 V.S.A. §§ 316(b)-(d); **and**
- B. should forward all **other** Public Records Requests to the Records Officer, Records Liaison(s), General Counsel, and Associate General Counsel as soon as possible and shall refrain from responding to the request until receiving instructions; **and**
- C. if designated to fulfill the request, and if the request is a “written request,” must log the request in the [Statewide Public Record Requests Database](#) (1 V.S.A. § 318a), completing the following fields listed in in the table later in this section.

**2. Model Responses**

**a. Responsive Records**

In the event records requested from the Board are available, the following response shall serve as a guideline and model for fulfilling a request to inspect or copy a Board record:

*Thank you for your request for [description of records request]. I certify that [insert unit] has conducted a diligent search and that to the best of my knowledge, information and belief, all responsive records for the above Public Records Request have been provided and that I have both asked the subject matter experts to identify*

any records related to an on-going investigation which may be relevant to exemption review and relayed any such context related to these records to [Board Legal Counsel / Board Records Officer].

Any concerns or requests for appeal may be brought to the attention of the Board Chair [First Name Last Name] at [act250.legal@vermont.gov](mailto:act250.legal@vermont.gov).

#### **b. Denial**

In the event records requested from the Board are clearly exempt from public inspection and copying pursuant to a specific statutory exemption, the following response shall serve as a guideline and model for denying a request to inspect or copy a Board record:

*Thank you for your request for [description of records request]. The records you request are exempt from public inspection and copying pursuant to [citation of statute,] which states: “[transcription of from statute].” On this basis, [Number] records are exempt because [brief statement of the reasons and supporting facts for denial].*

*The Board officer(s) responsible for this denial is/are [names and titles or positions of each person responsible for denial of the request]. Any concerns or requests for appeal may be brought to the attention of the Board Chair [First Name Last Name] at [act250.legal@vermont.gov](mailto:act250.legal@vermont.gov).*

#### **c. No Responsive Records**

In the event records requested from the Board do not exist, the following response shall serve as a guideline and model for not fulfilling a request to inspect or copy a Board record:

*Thank you for your request for [description of records request]. I certify that [insert unit] has conducted a diligent search and that to the best of my knowledge, information and belief, there are no responsive records for the above Public Records Request per 1 V.S.A. § 318(b)(4) under the name given to the Board or by any other name known to the Board.*

*Any concerns or requests for appeal may be brought to the attention of the Board Chair [First Name Last Name] at [act250.legal@vermont.gov](mailto:act250.legal@vermont.gov).*

### **3. Logging Requests in the Public Records Request Database**

Board employees responding to Records Requests must log each request in the [Statewide Public Record Request Database](#). Click on “New Requests” and then complete the following fields:

| <b>Field name/description</b>  | <b>Description</b>   |
|--------------------------------|--|
| <b>Status (Open or Closed)</b> | Use either “Open” or “Closed”; if a quick turnaround is expected, then simply choose “Closed.” If a request will take more than a day to fulfill, then choose “Open” and then when complete, use “Closed.” |
| <b>Date Received</b>           | Log the date you received the request, regardless of time of day received. You can add a note in the Comments if receipt was outside of SOV business hours.  |
| <b>Requestor First Name</b>    | Self-explanatory   |
| <b>Requestor Last Name</b>     | Self-explanatory   |
| <b>Requestor Email Address</b> | If no email address, leave blank.  |

| <b>Field name/description</b>   | <b>Description</b>  |
|---|---|
| <b>Requestor Contact Information (address and/or phone number)</b>  | If only email address, leave blank; or capture phone or mailing address, or both, if available. Add the name of the organization here.  |
| <b>State Entity</b>   | SOV entity receiving request; in this case, always NRB.   |
| <b>Request Description</b>  | Summarize the request or state something very specific. Use your best judgment about what a member of the public who knows nothing about the document request would find useful.  |
| <b>Action Taken (None, Fulfilled in Part, Fulfilled in Whole, Not Fulfilled, or Pending Requestor Response)</b> | Choose this response in the interim if more information needed: Pending Requestor Response.<br>Choose one of these three as a final action: Fulfilled in Part, Fulfilled in Whole, Not Fulfilled.   |
| <b>Second Level (None)</b>  | When denied because the record does not exist, use this to specify "Records Do Not Exist." When denied because the record is exempt, state "Exempt" and choose the applicable Statutory Exemption in the next field.                          |
| <b>Statutory Exemption</b>  | Choose from the drop-down list the applicable Statute when request fulfilled in part or not fulfilled because the requested record is exempt.   |
| <b>Date Closed</b>  | Log the date you provided the requested information to the requestor or closed the request because no data was available (no such record or records requested are "exempt")   |
| <b>Hours (enter whole hours; example: 2. Enter the actual hours spent to complete)</b>                          | Self-explanatory  |
| <b>Minutes (enter whole minutes. Example: 31 or 4. Enter actual minutes spent to complete)</b>                  | Self-explanatory  |
| <b>Amount billed (if no amount billed, enter 0.00)</b>  | Charge based on <a href="#">1 V.S.A. § 316</a> and " <a href="#">Uniform Charges Schedule</a> " (outside of photocopying fees, consult with the Board's Attorneys and Business Director whether a fee should be charged for any other action) |
| <b>Comments</b>   | Add useful information here that couldn't be captured in any of the other fields in this form.  |
| <b>Type of Request (Written, Verbal, Email)</b>   | Verbal can be defined as in-person or by phone.   |



## **APPENDIX B: RECORDS MANAGEMENT GUIDELINE**

The Records Management Guidelines incorporated into this Appendix shall be used for the systematic management of records and information with the Board under the direction of the Records Officer. Retention requirements stated in the Board's SRSs apply to records and information in all formats, including records created or received electronically.

### **1. Systematic Management**

Board employees must follow these guidelines as supplemented by division internal guidelines and best practices approved by the Records Officer. Where possible the Board will incorporate [State records management standards and best practices](#) to ensure records are safe from alteration, damage, and loss.

Copies of records made only for the convenience of reference or informational purposes may be discarded when no longer needed unless otherwise directed through a division/section office internal guidelines and best practices. Duplicates or copies of records shall not be retained longer than the original records. See SRS-1867.1000: Transitory Records.

### **2. Retention and Disposition**

Record and information retention and disposition are guided by agency specific record schedules (SRSs) issued to the Board by the Vermont State Archives and Records Administration (VSARA), and encompass business, legal, and long-term informational requirements for the efficient and economical management of the Board's records and information. The Board Records Officer in partnership with VSARA, legal counsel, and subject matter experts will develop record schedules for the retention and disposition of records not currently covered by the Board's SRSs.

Board employees and appointees must retain all Board records in the legal custody of the Board until retention requirements established by the Board's SRSs have been met.

### **3. Documentation of Records Disposition**

The custodian of the records shall retain documentation of record dispositions, to indemnify the Board against legal liability as well as provide an audit trail for successors. Documentation files should include:

- a. Date of record or information disposition
- b. Type of disposition (e.g. shredding, recycling, transfers to VSARA)
- c. Description of record or information (see relevant published record schedule)
- d. Dates of record or information
- e. Authorization (SRS, Disposition Order, or legal authority) permitting disposition

### **4. Litigation Holds**

If the Board is served with a discovery request for records or reasonably anticipates litigation, investigation, or audit, the Board's legal counsel and Records Officer will be informed. The Records Officer in collaboration with the Board's legal counsel shall take steps to immediately suspend destruction of any related records and/or data by notifying relevant division or section record holders. A model document preservation request is presented below.

Example litigation hold memo from the Board's staff attorney:

**CONFIDENTIAL MEMORANDUM  
ATTORNEY-CLIENT PRIVILEGED COMMUNICATION  
ATTORNEY WORK PRODUCT**

*This memorandum is to formally notify you to preserve all documents relating to [entity] and all documents that could potentially be relevant to a lawsuit involving [entity] and [record number, if applicable]. A litigation hold like this must be issued whenever litigation begins or is reasonably anticipated. Under those circumstances, courts require the preservation of documents that could be relevant to litigation and can impose serious sanctions if documents are not retained. We will be in touch within the next few weeks with additional details. In the meantime, please err on the side of caution and preserve all information you could possibly see as being relevant to the [applicable documents, process, or record number(s)] involving the following persons:*

•*[bulleted list of persons]*

*Please promptly implement this hold and continue it until you are notified by the legal department that it can be discontinued. Staff that have, or may have, relevant documents should be reminded of their obligations regularly, at least once every three months. If any relevant documents are subject to a routine destruction policy, it must be suspended.*

*Courts construe the term document very broadly to mean all kinds of information stored in any manner. As a result, the preservation obligation includes both traditional documents like Word files, paper documents, and emails, and information contained in any other medium, including text messages, voicemails, chats, photographs, video and audio recordings, databases, and file storage systems. The preservation obligation includes all types of electronically stored information created using any type of technology and includes documents and electronically stored information held both on- and off-site.*

*New documents created after this notice relating [entity] or any potential dispute involving [entity] must also be preserved. All information should be stored in its original, unaltered form. Emails and documents on individual hard drives are among the most difficult types of information to preserve, especially if employees with relevant information leave State employment. If any employees leave during this hold, their emails, and relevant documents contained on their hard drives, servers or file management systems, or in paper form, must be preserved. To the extent possible, such employees should be encouraged to identify relevant documents before their employment ends. It is important to preserve emails and correspondence even if they may eventually be protected from disclosure by a claim of privilege.*

*This hold must be communicated by you to all personnel in your office who have control of documents or data systems and to all personnel who may have relevant documents. This hold should also be communicated either to the individuals in charge of your information technology systems, or to the Agency of Digital Services if the Agency manages your technology systems.*

*If you are unsure about whether any particular information should be retained, please err on the side of caution and retain it. Please contact me with any questions about this memorandum or your obligations under it.*

When the litigation hold is lifted, the Records Officer and/or the Board’s legal counsel will notify the division or section record holders that the hold is no longer in place and the records may be dispositioned in accordance with the applicable SRS.

Litigation holds apply to all responsive records and information held by the Board, including written and electronic records, photographs, video, audio recordings (VoIP), and Teams chats held within a division or section’s records, or stored in off-site repositories including the Vermont State Records Center in Middlesex.

Responsive records and information should be stored in the original, or native, format in which the Board created or received them. Email should be exported from Outlook and saved in an easily accessible electronic file.

If, during the time of a litigation hold, employees leave their employment with the Board, the division director or most senior manager of the division/section shall take steps to preserve such records. The division director or senior manager shall contact the Records Officer for guidance.

The following definitions have been adopted by the Board and are applicable to SRSs issued to the Board and Board division internal guidelines and best practices.

| <b>Term</b>        | <b>Meaning</b>   |
|--------------------|--|
| Archives           | Retain indefinitely. These records are permanent and are eligible for transfer to the State Archives.              |
| Calendar Year Ends | Retain until the end of the calendar year.   |
| Completed/Closed   | Retain until the activity or process supported by the record is completed.   |
| Destroy            | Destroy by recycling or deleting. If the records are exempt from public access, destroy by shredding.              |
| Exempt             | Records shall not be provided for free and open examination pursuant to 1 V.S.A. §§ 315-320.                       |
| Expired            | Retain until the conditions or requirements supported by the record are satisfied and no further action is needed. |
| Obsolete           | Retain until the record is no longer needed administratively and is valueless.                                     |
| Superseded         | Retain until the record is superseded, updated, or revised.  |

## APPENDIX C: INFORMATION TECHNOLOGY GUIDELINE

The State of Vermont (SOV)'s Office 365 platform is administered by the Agency of Digital Services. Although Office 365 does not readily support the Board's ability to comply with the Public Records Act (PRA) and/or the statewide records and information management program, the management of some transitory records (SRS-1867.1000) is automated to the extent possible. Employees shall use Office 365 applications as prescribed in the matrix below.

| SOV O365            | OneDrive for Business  | Teams  | Exchange/Outlook  | SharePoint  | Azure  |
|---------------------|--|--|---|---|--|
| <b>Primary Use</b>  | Personal Work Drive  | Collaboration  | Communication   | Content Management  | Archival (local)   |
| <b>Features</b>     | <ul style="list-style-type: none"> <li>• User Workspace</li> <li>• Informal Storage</li> <li>• Edit/View/Share</li> <li>• Attachments</li> </ul> | <ul style="list-style-type: none"> <li>• Chat</li> <li>• Workspace</li> <li>• Meetings</li> <li>• Attachments</li> </ul>                         | <ul style="list-style-type: none"> <li>• Messaging</li> <li>• Calendaring</li> <li>• Managing tasks</li> <li>• Attachments</li> </ul> | <ul style="list-style-type: none"> <li>• Agency Intranet</li> <li>• Formalized Storage</li> <li>• Structured Access</li> <li>• Business Continuity</li> </ul> | <ul style="list-style-type: none"> <li>• Formalized Storage</li> <li>• Structured Access</li> <li>• Business Continuity</li> </ul> |
| <b>Intended Use</b> | Individual user workspace to support personal work routines such as drafting, notetaking and personal reference with limited need to share.      | Team workspace to support routine communications and activities of a team, including internal workflows and day-to-day operations and processes. | Communication platform for formal communications, whether routine or substantive, among users and internal and external parties.      | Office-wide platform for formalized storage of Office records and information with structured access and workflows for records management.                    | Storage application of convenience copies of permanent records infrequently accessed.  |
| <b>Schedule(s)</b>  | SRS-1867.1000 (Transitory Records)   | SRS-1867.1000 (Transitory Records) or SRS-1867.1103 (Operations/Managerial Records)  | Varies based on context/content   | Varies based on context/content   | Varies based on context/content  |
| <b>Retention</b>    | User manages in accordance with schedule with no automated retention.  | Users manage in accordance with schedules with no automated retention.   | User manages in accordance with schedule with no automated retention.   | User manages in accordance with schedules with no automated retention.  | Storage for convenience copies of contractually-scanned district files needed for routine business.                                |
| <b>Automation</b>   | None   | Default of 30-day retention for all messages within chats (excludes messages in private and standard Team channels).                             | (Pending)   | (Pending)   | None   |

| SOV O365            | OneDrive for Business  | Teams   | Exchange/Outlook  | SharePoint | Azure     |
|---------------------|--|---|---|------------|-----------|
| <b>Deactivation</b> | 30 days from date of separation with proper notice to supervisor.  | 30 days after six (6) months of inactivity with proper notice to Team owner.  | (Pending)   | (Pending)  | (Pending) |
| <b>Disposition</b>  | Records that have not met retention requirements in the schedule must be migrated by the user's supervisor within 30 days of deactivation. | Records that have not met retention requirements in the schedules must be migrated by Teams owner within 30 days of deactivation. | Records that have not met retention requirements in the schedules must be migrated by the user, with oversight by the supervisor, prior to separation date. | (Pending)  | (Pending) |

In addition to the matrix above, Board employees shall adhere to the following general guidelines when creating or receiving records using the SOV Office 365 Platform.

| Application                  | State of Vermont Office 365 Platform  |
|------------------------------|---|
| <b>Exchange/Outlook</b>      | <ul style="list-style-type: none"> <li>(Pending) Exchange/Outlook is a communication and calendaring application with a work email account that shall only be used for records and information created and received during Board business.</li> <li>(Pending) Messages created and received through Exchange shall be managed in accordance with their respective record schedules and only records that clearly fall under SRS-1867.1000 (Transitory Records) and possibly under SRS-1867.1103 (Operations/Managerial Records) shall be retained in only Exchange.</li> <li>(Pending) All other messages shall be relocated to an appropriate repository until record retention requirements have been met. For records and information appraised as permanent (archival) on a record schedule, contact the Vermont State Archives and Records Administration for digital preservation repository requirements.</li> </ul> |
| <b>OneDrive for Business</b> | <ul style="list-style-type: none"> <li>OneDrive for Business is a personal workspace and work drive that shall only be used for records and information created and received during Board business that clearly fall under SRS-1867.1000 (Transitory Records), including supervisory records (e.g. draft performance evaluations, copies of final evaluations that are on file with the Department of Human Resources, worksheets, notes, etc.).</li> </ul>   |
| <b>SharePoint</b>            | <ul style="list-style-type: none"> <li>SharePoint is a file storage and collaboration application that shall only be used for records and information received during Board business.</li> <li>(Pending) All records and information created or uploaded to SharePoint shall be managed in accordance with their respective record schedules.</li> <li>(Pending) If using SharePoint for records and information appraised as permanent (archival) on a record schedule, contact the VSARA for digital preservation requirements.</li> </ul>  |

| Application  | State of Vermont Office 365 Platform  |
|--------------|---|
| <b>Teams</b> | <ul style="list-style-type: none"> <li>• (Pending) Teams is a communication and collaboration application that shall only be used for records and information created and received during Board business that clearly fall under SRS-1867.1000 (Transitory Records) possibly under SRS-1867.1103 (Operations/Managerial Records).</li> <li>• (Pending) The Chat feature in Teams shall only be used for routine correspondence and shall be retained for no longer than 30 days.</li> </ul> |
| <b>Azure</b> | <ul style="list-style-type: none"> <li>• Azure is a file storage application for digital convenience copies of archival paper records.</li> <li>• (Pending) A pass-through to an archival platform managed by VSARA ensures permanent retention of digital records. State Archives preference is digital over paper.</li> </ul>   |

In addition to, but separate from, the Office 365 platform, Board employees shall adhere to the following guideline for other agency-wide external systems and platforms.

| Resource | Agency-Wide External Systems and Platforms  |
|----------|---|
| VoIP     | <ul style="list-style-type: none"> <li>• Voice over Internet Protocol (VoIP) transmits telephone calls over an Internet protocol (IP) network, such as the Internet, instead of the traditional public switched telephone network (PSTN) with an assigned work number.</li> <li>• (Pending) Messages created and received through VoIP shall be managed in accordance with their respective record schedule(s) and only records that clearly fall under SRS-1867.1000 (Transitory Records) and possibly under SRS-1867.1103 (Operations/Managerial Records) shall be retained only as voice mail associated with an assigned work number.</li> <li>• (Pending) All other messages shall be relocated to an appropriate repository until record retention requirements have been met. For records and information appraised as permanent (archival) on a record schedule, contact the Vermont State Archives and Records Administration for digital preservation repository requirements.</li> </ul> |