

**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

### **7-1: Introduction**

The Office of the Chief Information Officer (OCIO) maintains an electronic mail (email) system connected to the Department's Local Area Networks, both in Headquarters and in the field, to satisfy messaging and workflow collaboration requirements. This system allows users to conduct government-related business by exchanging electronic communications, including attachments, to improve customer service and to reduce or replace paper exchanges.

Email is an integral part of doing business, enabling rapid delivery of vital programs, services, and information. Increasing dependence on and use of email results in a compelling need to protect HUD resources through constant and improved monitoring, administration, user training, and awareness.

### **7-2: Purpose**

This document complies with current federal policy related to email systems and record retention. It also informs users of procedures to ensure consistent availability, efficient performance, and secure access.

### **7-3: Rescission**

This policy replaces the previous version, Revision 1, Change 3, from June 2003.

### **7-4: Applicability**

This policy applies to all HUD employees and contract personnel granted use of HUD's email system, regardless of where these persons are located.

This policy refers to HUD's email system, including email messages, file attachments, calendar entries, tasks, notes, conversations, and any other dated item associated with a user's profile, collectively referred to herein as "email data."

### **7-5: Effective Implementation Date**

This policy is effective upon the issuance date of this policy.

### **7-6: Policy**

#### **A. Authorized Use**

HUD's email system is intended to conduct government business. Use of the email system should be in conformance with HUD policies herein and in Chapter 8 and Appendix 6 of HUD Handbook 2400.1 Limited Personal Use of

**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

Government Office Equipment, including any related guidance on the use of government equipment for personal purposes. Users of the system are responsible for adhering to this policy.

The email system also provides online calendaring and scheduling, task tracking capabilities, and the ability to run authorized applications and databases to include automatic notifications and reminders. These are all authorized uses of HUD's email system.

Employees should check their email, including subfolders, regularly as part of their duties. While recipients are not held accountable for the content of email data, they should notify OCIO of unauthorized use as identified below.

Users are reminded that regardless of password control measures, all email messages and resulting attachments are the property of the Department. As such, all email data may be released to the public subject to the Freedom of Information Act (FOIA). Management has the same rights to inspect email as they do with hard copy documents by submitting a written request to General Counsel to access an employee's email data. Such requests can be fulfilled without notification to the affected employee.

These uses of the Department's email system are unauthorized:

- Email data sent for conducting any illegal activities, including making and/or aiding in carrying out threats against persons or federal property.
- Email data that contain any profane, obscene, sexist, or racist materials or other materials that could be offensive, unless necessary for professional actions.
- Email data that contain any language, information, or file attachments that, in any manner, solicit or imply solicitation of any product or procedure that may result in personal gain or profit for the sender and/or any of the addressees.
- Forwarding business-related email from the HUD email system to a personal account (see Section 7-6.D.5). This includes agents used to transfer email to private accounts outside of the HUD environment without authorization from OCIO.
- Mass mailings sent to multiple mailing lists throughout the Department using HUD's Global Address List (GAL), except as required in Section 7-6.E.2.
- Propagation of chain letters or broadcasts of inappropriate messages, as identified above and/or in Chapter 8 of HUD Handbook 2400.1, to lists or individuals by way of other comparable resource-intensive addressing mechanisms.

**U.S. Department of Housing and Urban Development  
Information Resources Management Policy  
Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

- Subscriptions to external newsgroups, bulletin boards, or other public forums, except where necessary for professional actions.
- Matters directed toward any fundraising, lobbying, or partisan political activities.

Unauthorized use of the Department's email system by any of the above means may result in a warning from OCIO staff, including notification of the supervisor and suspension of the originator from the email system and further corrective measures to include possible disciplinary or adverse actions. During a temporary restriction, the employee will be instructed on alternative means of completing work assignments. Said suspension from the email system will remain until the user's immediate supervisor confirms in writing to the appropriate OCIO manager that he/she has taken appropriate action and provided instruction to the user on the proper use of the Department's email system. At such time, the user's immediate supervisor may authorize the reinstatement of the user's email privileges. Repeated offenses by a user may result in loss of use or limitations on the use of equipment or systems, adverse actions, criminal penalties, and/or users being held financially liable for the cost resulting from damages due to improper use.

**B. Privacy**

As required by the Privacy Act of 1974, federal agencies must protect an individual's right to privacy when collecting personally identifiable information (PII). Any information that could potentially identify a specific individual should be encrypted before sent in email data. Failure to do so may result in personnel actions. PII includes, but is not limited to, social security numbers, date and place of birth, mother's maiden name, and biometric records.

For more information about email encryption, see [hud@work](mailto:hud@work) and the 2016 joint memo from the Senior Agency Official for Privacy and the Chief Information Officer, *Protecting Privacy with Encryption*.

**C. Records Management**

OCIO establishes specific automated and scheduled procedures for regularly archiving the email system of "outdated" data in accordance with Chapter 11 Records and File Management of HUD Handbook 2200.1. All email is archived except for the Deleted Items folder. Archived email data is stored for seven years to allow all employees to access historical emails needed to perform HUD's business. This seven-year retention policy applies to both current and former HUD email account holders. When an individual departs HUD, their email will similarly be retained in compliance with this policy.

A record is any documentary material, regardless of physical form, that is made or

**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

received by HUD for the transaction of public business, and appropriate for preservation by HUD, or its legitimate successor, as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities, or because of the value of the information it contains (44.U.S.C. 3301).

**1. Email Records**

Draft documents circulated on email systems may be records if they meet the criteria of a record as described above. However, note that not all emails are records.

Both originators and recipients of email messages are responsible for determining if their email is a record. A transmission has record value if it is the only place that transmits information fitting the definition of a record stated above.

Once the originator and/or recipient determines that an email is a record, he/she must retain a copy of the message (do not delete), including sender/recipient(s) of message, date, and subject line. This copy may be an electronic copy under an approved electronic record retention schedule.

**2. Email Records in Personal Accounts**

Official agency business should first and foremost be done on official HUD information systems. Use of non-HUD systems to conduct agency business may lead to the mismanagement of agency records and/or the unauthorized disclosure of agency information.

The Federal Records Act (FRA) prohibits the creation or sending of a federal record using a non-HUD email account unless the individual creating or sending the record either: (1) copies their HUD email account during initial creation or transmission of the record, or (2) forwards a complete copy of the record to their HUD email account within 20 calendar days of the original creation or transmission of the record. These requirements ensure that any use of a non-HUD information system does not affect the preservation of federal records for FRA purposes, or the ability to identify and process those records if requested under FOIA, the Privacy Act, or for other official business (e.g., litigation, congressional oversight requests).

HUD strongly discourages the use of personal email for sending or receiving agency records, but to the extent such use occurs, the individual creating or sending the record from a non-HUD email system must copy their HUD email account during transmission or forward that record to their HUD email account within 20 calendar days of creation or sending. Once the message is

**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

sent or forwarded to HUD email, the user must save the record (do not delete). Further, the record should be removed from non-HUD email systems unless there is a specific obligation, such as a litigation hold, to maintain the files on all systems on which they appear.

### **3. Records in Text Message and Other Electronic Mediums**

HUD discourages the use of text messaging on a mobile device for sending or receiving substantive (or non-transitory) agency records. However, HUD recognizes that some agency staff perform time-sensitive work that may, at times, require the creation of substantive (or non-transitory) records in the form of text messages for emergency or environmental notification purposes. In those limited instances, staff must continue to save and manage any text message records related to their work. In such a situation, staff must either: (1) copy the record to their HUD email account during initial creation or transmission of the record, or (2) forward a complete copy of the record to their HUD email account within 20 calendar days of the original creation or transmission of the record.

Similarly, users of text messaging, instant messaging, or other transient messaging technologies on HUD information systems are responsible for ensuring that messages that result in the creation of substantive (or non-transitory) federal records are saved for FRA purposes and placed in a recordkeeping system. For example, if a text message on a HUD mobile device is received or sent that qualifies as a substantive (or non-transitory) federal record, it must be saved into an approved recordkeeping system. To comply with this requirement, it should be forwarded into the HUD email system to be saved in an approved recordkeeping system. When forwarding the text message from the mobile device to the HUD email system, staff should include the time, date, subject, and sender/recipient of the message.

### **4. Capstone Email**

HUD will manage email under the National Archive and Records Administration's (NARA's) Capstone Approach. This approach acknowledges that the email records of senior agency officials document high-level policy and operational decisions and includes significant and historically valuable communications of the agency.

OCIO captures all email data from the accounts of agency Capstone officials, including secondary accounts and/or accounts maintained by assistants, as identified as part of Federal Identity, Credential, and Access Management. Email records of designated Capstone officials, and officials under the delegations of authority, are placed on litigation hold to be permanently

**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

retained and transferred to NARA. HUD's Capstone officials include these individuals, each of their deputies, and each of their staff assistants in both official and acting capacities:

- Secretary
- Deputy Secretary
- Chief Operating Officer
- Senior Advisor to the Secretary
- Chief of Staff
- Deputy Chief of Staff
- Federal Housing Administration Commissioner/Assistant Secretary for Housing
- Assistant Secretary for Community Planning and Development
- Assistant Secretary for Fair Housing and Equal Opportunity
- Assistant Secretary for Public and Indian Housing
- Assistant Secretary for Congressional and Intergovernmental Relations
- Assistant Secretary for Policy, Development and Research
- Assistant Secretary for Public Affairs
- Director, Office of Healthy Homes and Lead Hazard Control
- Director, Office of Departmental Equal Employment Opportunity
- President, Government National Mortgage Association
- Federal Housing Administration Comptroller
- General Counsel
- Chief Administrative Officer
- Chief Financial Officer
- Chief Human Capital Officer
- Chief Information Officer
- Chief Procurement Officer
- Inspector General
- Regional Administrator

## **5. E-Discovery**

When there is a "reasonable anticipation of litigation," email and other data must be preserved until final resolution of the legal matter per the Federal Rules of Civil Procedure. The Office of General Counsel or Office of Departmental Equal Employment Opportunity (ODEEO) will: (1) issue litigation holds to custodians notifying them to not delete, alter, or modify data related to a specific legal matter, and (2) submit data collection requests to preserve the necessary data. Preservation of electronically stored information such as email for potential litigation will be retained until a final resolution or closure letter is issued from ODEEO, the Associate General

**U.S. Department of Housing and Urban Development  
Information Resources Management Policy  
Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

Counsel, Regional Counsel, or his/her designee.

The e-Discovery preservation obligations supersede record retention schedules. If there is a litigation hold, electronically stored information (along with paper records) must be preserved until the litigation hold is lifted by the issuer or his/her designee. OCIO will work with OGC to ensure the preservation of email data subject to litigation hold.

#### **D. Technical Procedures**

##### **1. Mailbox Size**

Users must know that storage space is not an infinite commodity. The email system, therefore, cannot be expected to retain every message for an indefinite period. The size limit of a user's primary mailbox is 50 gigabytes. Users are responsible for deleting all messages they no longer need to retain.

Archived email data is stored separately and does not contribute to the size. Users should expect that outdated messages will automatically be archived as part of HUD's regularly scheduled and automated maintenance. These archived messages will be relocated to the Archive mailbox and remain accessible to users.

Users will automatically receive an email message notifying them they are approaching the designated size limit on their email account. At that time, users should contact the Help Desk for assistance in reducing the size of their mailbox.

##### **2. Message Size**

It is necessary to limit the size of individual email messages to ensure that the email system is not over-burdened. The current message size limitation is 35 megabytes for both incoming and outgoing messages, including attachments and other message data in addition to message text. Remember that header information may be as large as three megabytes. Employees should contact OCIO to send an email with attachments exceeding the maximum file size for alternative transmission.

##### **3. User Identification**

The standard naming convention for a user's primary email account is first name, middle initial, last name. Every effort will be made to standardize user names across computer systems. Whenever possible, the name used for the email system will be the same as the name used for payroll systems to ensure

**U.S. Department of Housing and Urban Development  
Information Resources Management Policy  
Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

that all employees receive approved mass organizational mailings.

**4. File Attachments**

In accordance with periodic security reviews and enhancements within HUD's network and in keeping with industry standards on virus protection and detection, attachments with certain file extensions (e.g., .exe, .vbs, and .pif file types) will be rejected via HUD's email system. Users should periodically check HUD's intranet for a current list of unauthorized file extensions.

**5. Forwarding Mail**

Auto-forwarding incoming email to a personal or other email address outside of HUD is not permitted due to retention and litigation requirements. Forwarding individual emails should be done judiciously as business requires and not include employees' personal email accounts or PII.

**E. Mass Mailings**

**1. Distribution Lists**

Departmental distribution lists may be used for authorized messages to a specific group of users. This situation generally occurs when a group contains specific personnel in multiple program areas, divisions, or branches. Departmental distribution lists reside in the HUD GAL and can only be created by the email administrator. Owners of Departmental distribution lists are expected to use this resource judiciously, in accordance with Section 7-6.A, and are responsible for keeping the lists current.

Prior to sending a message to a distribution list, users will check the member listing to ensure that it will only reach the intended audience. Owners of Departmental distribution lists, or a designee, must review their mailing lists at least quarterly and update the member listing as necessary. Except as required for broadcast email messages as described in Section 7-6.D, the GAL will not be used for sending mass mailings.

To request a new Departmental distribution list or a change to an existing list, contact the Help Desk.

Users can create personal distribution lists from their contacts for their own use. Users are expected to use this resource judiciously and in accordance with Section 7-6.A.

**2. Broadcast Email Messages**



**U.S. Department of Housing and Urban Development**  
**Information Resources Management Policy**  
**Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

Broadcast email messages are those that are sent by management to all or subsets of HUD employees to ensure awareness of HUD-sponsored, business-related, or mandatory events. Authorization from the Office of Public Affairs is required to transmit broadcast email messages except for OCIO messages related to IT maintenance and upgrades. These messages should be kept brief and in compliance with Section 7-6.A.

**F. Removing Separated Employees**

Separating employees must follow established procedures as part of their clearance process. Through this process, information is provided to the email administration staff sufficient to remove the separating employee's email access and account. If management must access the separated employee's email data, they must submit a written request to OCIO.

**G. Generic Mailboxes**

Generically-named mailboxes provide a mailbox that is specific to a program, project, or group rather than specific to a user. These mailboxes provide a central repository that can be accessed by designated users and provide a central mailing address for customers.

Generically-named mailboxes will be established if there is a demonstrable need. Each generic mailbox must have an owner identified with an email address. Generic mailboxes are subject to all policies and procedures stated throughout this policy including user maintenance, message size limitations, and message integrity. Where possible, the specific user will be held accountable for unauthorized use of the mailbox or, where appropriate, the owner or all users. Generically-named mailboxes will be deactivated if the mailbox is not maintained in compliance with established policies and procedures or is no longer being used.

Users in Headquarters should contact their program area's Office Technology Coordinator to submit a request for a generic mailbox. Users in the field should contact their IT Director staff.

Generic mailboxes generally do not have an Archive mailbox; therefore, email data is retained for seven years or until 99 gigabytes, whichever comes first, unless the generic mailbox is subject to a litigation hold.

**H. Remote Access**

The ability to remotely access HUD's email data is supported by the Department for authorized users. HUD's email data can be accessed via remote access, an Internet browser, or personal device in accordance with HUD Handbook 625.1

**U.S. Department of Housing and Urban Development  
Information Resources Management Policy  
Chapter 7: Electronic Mail Policy**

**HUD Handbook 2400.1 REV-1, CHG-6**

---

Telework Policy, the Fair Labor Standards Act, and OCIO's Bring Your Own Device Policy.

**7-7: Authorities and References**

This policy ensures compliance with these statutes, directives, and guidance:

- Bring Your Own Device Policy (HUD Handbook 2400.1);
- Clinger-Cohen Act of 1996 (40 U.S.C 11315);
- Creation and Maintenance of Federal Records (36 CFR 1222);
- Disposition of Federal Records (36 CFR Chapter XII Subchapter B);
- E-Government Act of 2002 (44 U.S.C. Chapter 36);
- Fair Labor Standards Act (29 U.S.C. 201-219);
- Federal Information Security Management Act of 2002 (44 U.S.C. 3541);
- Federal Records (36 CFR 1220);
- Federal Records Act of 1950 (44 U.S.C. Chapter 31);
- Form HUD-22018 (03/2010) Office of the Chief Information Security Officer Rules of Behavior for Remote Access;
- Freedom of Information Act (5 U.S.C. 552);
- General Records Schedules (National Archives);
- HUD Records Disposition Schedule (HUD Handbook 2225.6);
- Limited Personal Use of Government Office Equipment Policy (HUD Handbook 2400.1, Chapter 8 and Appendix 6);
- Privacy Act of 1974 (5 U.S.C. 552a);
- Protecting Privacy with Encryption (HUD Memo 8/1/2016);
- Records Disposition Management (HUD Handbook 2228.1); and
- Records Disposition Scheduling for Automated Systems (HUD Handbook 2229.1).