

Lee, Chris

From: Houston, Bradley
Sent: Wednesday, March 9, 2022 4:43 PM
To: Kelsey, Rhonda
Subject: RE: Request for Feedback: M365 and DocuSign Data Retention Policies
Attachments: Appendix A.docx; Appendix B.xlsx

Hi Rhonda,

Responses in red, below. Please let me know if you have any questions about my answers or would otherwise like to discuss further.

Brad

Brad Houston, City Records Officer
Milwaukee Municipal Research Center
Zeidler Municipal Building Rm. B-1, Milwaukee, WI 53202
Phone: 414-286-5478

From: Kelsey, Rhonda
Sent: Wednesday, March 9, 2022 3:47 PM
To: Houston, Bradley <Bradley.Houston@milwaukee.gov>
Subject: RE: Request for Feedback: M365 and DocuSign Data Retention Policies

Hi Bradley,

I do have the following questions/concerns regarding the proposed DocuSign policy:

- 1) Are recommending that we save a copy of the certificate of completion as it relates to city contracts on the City's network or in the contract file folder itself?

The certificate should be maintained wherever you are maintaining the authoritative version of the contract. My recommendation has typically been to download the contract and the certificate as one document, which solves that problem quite neatly.

- 2) How long should the certificate be saved?

The certificate should be saved for the length of the retention of the records series to which it pertains. For contracts, this follows RRDA 13-E029, which has a retention of 10 years after expiration of the contract and destroy.

- 3) What is the risk if it is not saved? If the signatures are dated and signed on the contract itself – isn't that sufficient history in itself?

The answer to this question is based on how strict you want to be on signature authenticity. From a legal standpoint, an e-signature platform is designed to comply with the ESIGN law, which, among other provisions, requires that e-signatures demonstrate intent to sign, clearly identify the signer, and are maintained in a secure, integrity-preserving platform. DocuSign does this by providing an audit trail for the validity of the signature in the Certificate of Authenticity.

In other words, the Certificate proves that the document was actually signed and when, and that the signatures have not been “spoofed” by a third party later. If you’re comfortable keeping this audit trail in DocuSign itself, you’re within your rights to do so—but you do so at the risk of losing it if envelopes are purged later.

4) In addition, we do track the routing of contracts for signature internally. Based on this, I am trying to find the value in saving another piece of paper and or document to track the same information.

It’s a fair question if you’re already doing the tracking. I will say that a benefit of DocuSign is that it combines tracking with authenticity for each party in the signing process, though I admit that this can be difficult to configure for particularly complex transactions. As far as an extra piece of paper, the policy assumes that you are keeping this record in electronic form, so you only are going to be producing paper for your reference, rather than as an additional required step.

5) On page 3, the policy states that documents should not be saved on Share drives, do you mean Shared drives? Please clarify.

Correct. I should clarify that you CAN keep completed documents on shared drives, but it is not recommended from a records/information standpoint because of the potential to misplace unstructured data and the lack of retention or preservation controls on same. If you feel that your shared drive is structured well enough to make sure the record is accessible, authentic, and legible for the length of the contract, it is certainly an option to maintain documents there.

6) Where are the appendices referenced on pages three (3) and four (4)

Attached to this email (and this is a good reminder for me to send to Chris Lee to add these to the official file.) Both of these are examples; the onboarding document will be refined with the help of ITMD and the Data Governance group, and the report is a snapshot of envelopes sent between March and May 2021, so no longer terribly accurate in terms of how the platform is actively being used. I’ve asked Don Turner to send me a list of envelopes without titles so I can monitor department usage and identify possible intervention points while minimizing my exposure to PII.

7) After 14 days are you recommending that an envelope can be defined as completed and then destroyed?

Terminology here is a bit misleading—the “Purge Queue” is the DocuSign equivalent of the Recycle Bin, and THAT is emptied 14 days after depositing something there. So if your department DocuSign steward has determined that they no longer need an envelope because it has been signed and exported, or because it was voided, etc., when they hit “delete” they have 14 days to get an envelope back before it’s gone forever. There is no plan currently to apply automatic retention to envelopes in progress or to completed envelopes that are of ongoing use to the department.

Rhonda Kelsey

City Purchasing Director

City of Milwaukee Purchasing Division

200 East Wells St., Room 601

Milwaukee, WI 53202



From: Houston, Bradley <Bradley.Houston@milwaukee.gov>
Sent: Wednesday, March 2, 2022 9:39 AM
To: Allen, Jerry (contact) <jerry.allen@cmers.com>; Benson, Joshua <jbenso@milwaukee.gov>; Cleary, Beth <bcleary@milwaukee.gov>; Coggs, Spencer <scoggs@milwaukee.gov>; Cooney, Jim <Jim.Cooney@milwaukee.gov>; Crump, Lafayette <Lafayette.Crump@milwaukee.gov>; Dettmer, Karen <Karen.Dettmer@milwaukee.gov>; Edwards, Myra <medwards@milwaukee.gov>; Fessahaye, Makda <mfessa@milwaukee.gov>; FINGER, CHERYL <cfinger@milwaukee.gov>; Fleck, Nicole <nfleck@milwaukee.gov>; Henke, David A. <dhenke@milwaukee.gov>; Himle, Sheldyn <shimle@milwaukee.gov>; Jackson, Celia <cmjacks@milwaukee.gov>; Johnson, Joan <JRJohns@milwaukee.gov>; Johnson, Kirsten <Krjohns@milwaukee.gov>; Joos, Renee <rjoos@milwaukee.gov>; Kelsey, Rhonda <Rhonda.Kelsey@milwaukee.gov>; Klajbor, Jim <jklajb@milwaukee.gov>; Kruschke, Jerrel <jkrusc@milwaukee.gov>; LIPSKI, AARON <ALIPSK@milwaukee.gov>; Mahan, Steven <Steven.Mahan@milwaukee.gov>; Mazmanian, Michael <mmazma@milwaukee.gov>; Meyer-Stearns, Jennifer <jrmeyer@milwaukee.gov>; Mishefske, Thomas <tmishe@milwaukee.gov>; Montgomery, Kimberly <Kimberly.Montgomery@milwaukee.gov>; Owczarski, Jim <jowcza@milwaukee.gov>; Purvis, Nikki <npurvi@milwaukee.gov>; Roberts, Erica <errober@milwaukee.gov>; Robinson, Sharon <srobins@milwaukee.gov>; Rodriguez, Danielle <DRodri@milwaukee.gov>; Sawa, Aycha <asawa@milwaukee.gov>; Shambarger, Erick <Eshamb@milwaukee.gov>; Spencer, Tearman <tspencer@milwaukee.gov>; Thomas, Dan <dthoma@milwaukee.gov>; Tindall-Schlicht, Adam <adam.tindall.schlicht@milwaukee.gov>; Todd, Leon <letodd@milwaukee.gov>; Woodall-Vogg, Claire <cwooda@milwaukee.gov>; Yaccarino, Dennis <Dyacca@milwaukee.gov>; Zelazny, Dana <D.Zelazny@milwaukee.gov>; Zuniga, Jonatan <jzunig@milwaukee.gov>; Larsen, Nicole <nilarse@milwaukee.gov>
Subject: RE: Request for Feedback: M365 and DocuSign Data Retention Policies
Importance: High

Hello all,

Friendly reminder that if you or one of your staff has comments on either the DocuSign data retention policy or the M365 data retention policy, please get them to me by no later than **Friday, March 11, 2022**. Both policies have potential implications on the retention of records in DocuSign, Teams, OneDrive, and SharePoint for departments, so please do take a look at these and let me know if there is anything in either that you have concerns about.

The policy will be brought to the City Information Management Committee for their 3/17/22 meeting and from there referred to Common Council for passage as official city policy, so it is important that I have feedback from as wide a variety of departments as possible. Please let me know if you need me to re-send either document, or if you have any quick questions I can answer.

Thank you,

Brad Houston, City Records Officer
Milwaukee Municipal Research Center
Zeidler Municipal Building Rm. B-1, Milwaukee, WI 53202
Phone: 414-286-5478

From: Houston, Bradley
Sent: Thursday, January 6, 2022 10:49 AM
To: Allen, Jerry (contact) <jerry.allen@cmers.com>; Benson, Joshua <jbenso@milwaukee.gov>; Cleary, Beth <bcleary@milwaukee.gov>; Coggs, Spencer <scoggs@milwaukee.gov>; Cooney, Jim <Jim.Cooney@milwaukee.gov>; Crump, Lafayette <Lafayette.Crump@milwaukee.gov>; Dettmer, Karen <Karen.Dettmer@milwaukee.gov>; Edwards, Myra <medwards@milwaukee.gov>; Fessahaye, Makda <mfessa@milwaukee.gov>; FINGER, CHERYL <cfinger@milwaukee.gov>; Fleck, Nicole <nfleck@milwaukee.gov>; Henke, David A. <dhenke@milwaukee.gov>; Himle, Sheldyn <shimle@milwaukee.gov>; Jackson, Celia <cmjacks@milwaukee.gov>; Johnson, Joan

<JRJohns@milwaukee.gov>; Johnson, Kirsten <Krjohns@milwaukee.gov>; Joos, Renee <rjoos@milwaukee.gov>; Kelsey, Rhonda <Rhonda.Kelsey@milwaukee.gov>; Klajbor, Jim <klajb@milwaukee.gov>; Kruschke, Jerrel <jkrusc@milwaukee.gov>; LIPSKI, AARON <ALIPSK@milwaukee.gov>; Mahan, Steven <Steven.Mahan@milwaukee.gov>; Mazmanian, Michael <mmazma@milwaukee.gov>; Meyer-Stearns, Jennifer <jrmeyer@milwaukee.gov>; Miner, Steve <sminer@milwaukee.gov>; Mishefske, Thomas <tmishe@milwaukee.gov>; Montgomery, Kimberly <Kimberly.Montgomery@milwaukee.gov>; Owczarski, Jim <jowcza@milwaukee.gov>; Purvis, Nikki <npurvi@milwaukee.gov>; Roberts, Erica <errober@milwaukee.gov>; Robinson, Sharon <srobins@milwaukee.gov>; Rodriguez, Danielle <DRodri@milwaukee.gov>; Sawa, Aycha <asawa@milwaukee.gov>; Shambarger, Erick <Eshamb@milwaukee.gov>; Spencer, Tearman <tspencer@milwaukee.gov>; Thomas, Dan <dthoma@milwaukee.gov>; Tindall-Schlicht, Adam <adam.tindall.schlicht@milwaukee.gov>; Todd, Leon <letodd@milwaukee.gov>; Woodall-Vogg, Claire <cwooda@milwaukee.gov>; Yaccarino, Dennis <Dyacca@milwaukee.gov>; Zelazny, Dana <D.Zelazny@milwaukee.gov>; Zuniga, Jonatan <jzunig@milwaukee.gov>

Subject: Request for Feedback: M365 and DocuSign Data Retention Policies

Hello all,

Happy new year! Attached, please find two policies approved in principle by the City Information Management Committee at its December 9, 2021 meeting for your review, as well as a memo explaining the nature of the policies and feedback requested. Please review with your staff as appropriate and submit any questions or comments you have to me by **February 7** if at all possible.

Additionally, friendly reminder that, if you have not yet submitted to me your departmental records coordinator changes, please do so by 1/14/22.

Thank you in advance,

Brad Houston, City Records Officer
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