

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	3
SECTION 1: BACKGROUND INFORMATION	4
THE NATIONAL ARCHIVES AND PERMANENT RECORDS	4
EMAIL MANAGEMENT.....	4
SECTION 2: RECORDS MANAGEMENT GUIDANCE	5
THE PRESIDENTIAL MEMORANDUM AND DIRECTIVE.....	6
NARA BULLETIN 2013-02, THE CAPSTONE APPROACH.....	6
SECTION 3: DISPOSITION AUTHORITY FOR EMAIL RECORDS.....	8
SECTION 4: CAPSTONE GRS DEVELOPMENT.....	9
CHALLENGES	9
TARGETED FOCUS GROUP	10
GOVERNMENT-WIDE REVIEW	10
INTERNAL TESTS.....	11
STRUCTURE OF THE CAPSTONE GRS	11
THE CAPSTONE GRS FAQ	13
VERIFICATION AND APPROVAL PROCESS	13
NEXT STEPS	14
APPENDIX A: THE CAPSTONE GRS.....	A-1
APPENDIX B: FAQs ABOUT THE CAPSTONE GRS	B-1
APPENDIX C: VERIFICATION FORM	C-1
APPENDIX D: NARA APPRAISAL REPORT.....	D-1
APPENDIX E: TARGETED FOCUS GROUP ATTENDEES	E-1
APPENDIX F: GOVERNMENT-WIDE REVIEW COMMENTERS.....	F-1

EXECUTIVE SUMMARY

This white paper helps explain the process and decisions leading to the development of a General Records Schedule (GRS) for Email Managed under a Capstone Approach, as well as providing additional contextual information and detail not included in the typical appraisal report. The Capstone Approach offers agencies the option of using a more simplified and automated approach to managing email that allows for the categorization and scheduling of email based on the work and/or position of the email account owner.

The benefits of the Capstone approach are:

- Increasing the amount of email of permanent value transferred to NARA,
- Reducing the burden on individual end-users within agencies,
- Reducing reliance on print-and-file practices, and
- Allowing for systematic destruction of temporary email based on an approved NARA disposition authority, reducing the amount of email that has no further value being stored by agencies.

SECTION 1: BACKGROUND Information

The National Archives and Permanent Records

NARA's [mission](http://www.archives.gov/about/info/mission.html)¹ is to provide public access to Federal Government records in our custody and control. Public access to Government records strengthens democracy by allowing Americans to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

The Archivist of the United States determines which federal records warrant permanent preservation and should be transferred to the National Archives for preservation and public access. The decision as to which records are permanent is made through the [scheduling](http://www.archives.gov/records-mgmt/policy/records-schedule-review-process.html)² and [appraisal](http://www.archives.gov/records-mgmt/initiatives/appraisal.html)³ process. Agencies cannot destroy Federal records without the approval of the Archivist of the United States. The Federal Records Act gives the Archivist the authority to determine the retention and disposition of federal records (44 U.S.C Chapters 21, 29, and 33). Authority for the transfer of records with archival value into NARA's legal custody is outlined in 44 U.S.C. Chapters 21 and 29.

Not all records possess permanent archival value. NARA estimates that less than five percent (5%) of records across the Federal Government require permanent retention and should be transferred to the legal custody of the National Archives. NARA determines that most federal records have temporary value and authorizes agencies to destroy them when they are no longer needed for agency business needs, or when legal or public accountability interests have generally expired. A temporary determination by NARA, however, still requires agencies to maintain those temporary records for an amount of time that allows the agency to fulfill their obligations. All Federal records have value and must be kept for some period of time; however, few records have permanent value.

Email Management

Email often meets the definition of a federal record as provided in the Federal Records Act (44 U.S.C., § 3301), which includes:

“... all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.”

Management of email, however, has remained a challenge to most, if not all, federal agencies. In what is often referred to as “traditional records management,” the email management burden is typically placed on each end-user to make a record or nonrecord decision and to determine retention and final disposition under existing records schedules based on the content of the message, on an email-by-email basis. Further, end users may need to determine whether cross-

¹ <http://www.archives.gov/about/info/mission.html>

² <http://www.archives.gov/records-mgmt/policy/records-schedule-review-process.html>

³ <http://www.archives.gov/records-mgmt/initiatives/appraisal.html>

filing individual emails with other records (such as case files) is required. The end-user must also manage nonrecord⁴ email, including those of a personal nature.

Using a traditional records management method, and often due to the lack of effective and affordable electronic records management systems, many agencies adopted a “print-and-file” policy. This policy typically instructs users that electronic records – including email – are to be printed into hard-copy (paper) for official filing. This paper version becomes the official recordkeeping version. This process requires manual intervention by the user, who has to determine whether each email is a federal record, and then determine the appropriate disposition authority and filing location for each email record.

Until recently, NARA supported this practice even as it encouraged agencies to adopt electronic recordkeeping systems, for example through the endorsement of the DoD 5015 standard⁵. The increasing designation of electronic records as the record copy, as well as the growing exponential volume of email that federal agencies are responsible for managing, made this practice untenable as an email strategy. This has led to resource allocation issues: 1) a risk that permanently valuable email is not being appropriately captured and transferred to NARA, and 2) a risk that temporary email is being destroyed too soon or kept far too long.

In 2007, Congress began holding hearings on email records management by the White House and federal agencies. Congress passed legislation requiring email records be managed electronically.

Recently, the press reported several high profile instances of alleged or actual email mismanagement, further highlighting the email management challenge; most notably from the Internal Revenue Service (IRS)⁶, Centers for Medicare & Medicaid’s Services (CMS)⁷, and the Environmental Protection Agency (EPA).⁸ These stories further demonstrate the need for a more practical method for managing and preserving email in the Federal Government.

SECTION 2: RECORDS MANAGEMENT GUIDANCE

Over the past decade, NARA has conducted studies, provided email management guidance,

⁴ *Nonrecord materials* are those Federally owned informational materials that do not meet the statutory definition of records (44 U.S.C. 3301) or that have been excluded from coverage by the definition. Excluded materials are extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit. *Personal files* (also called *personal papers*) are a type of nonrecord material and are documentary materials belonging to an individual that are not used to conduct agency business. Personal files are excluded from the definition of Federal records and are not owned by the Government. (36 CFR 1220.18)

⁵ The [DoD 5015.02-STD, signed 25 April 2007](#), defines the basic requirements, based on operational, legislative and legal needs, that must be met by records management application (RMA) products acquired by the Department of Defense (DoD) and its Components. It defines requirements for RMA's managing classified records and includes requirements to support the Freedom of Information Act (FOIA), Privacy Act, and interoperability.

⁶ Bump, Philip. “[Here’s How the IRS lost emails from key witness Lois Lerner.](#)” *The Washington Post*, June 16, 2014.

⁷ Viebeck, Elise. “[ObamaCare office may have lost emails sought in oversight probe.](#)” *The Hill*, August 7, 2014.

⁸ Desjardins, Lisa. “[Environmental Protection Agency tells Congress it lost emails too.](#)” *CNN*, October 3, 2014.

revised regulations for electronic records management, and explored alternative ways of managing email. Policies and guidance released by NARA are available to the public at NARA's [Email Management](#)⁹ webpage and specific tools may be found in NARA's [Records Management Toolkit](#).¹⁰

In response to direction from senior NARA management in 2010, NARA formed the Email Management 2.0 working group. This group, led by NARA's Office of the Chief Records Officer, developed new guidance that aligns with other major records management initiatives under development. It was through this group that the Capstone Approach was researched, developed, and promulgated as guidance.

The Presidential Memorandum and Directive

With the signing of the [Presidential Memorandum on Managing Government Records](#)¹¹ by President Obama on November 28, 2011, and the subsequent issuance of the [Managing Government Records Directive](#)¹² (M-12-18) on August 24, 2012, by the Office of Management and Budget (OMB) and NARA, a new emphasis was placed on electronic records management.

Specific to email management, Section 1.2 of M-12-18 states, in part, that “[b]y December 31, 2016, federal agencies must manage all email records in an electronic format.” This requirement essentially does away with the traditional print-and-file policies and requires agencies to implement new approaches to manage their email electronically. Some agencies have had success with automated products and solutions, such as software that can automatically determine email content based on keyword searches and assign disposition accordingly. Although technology for fully automated email management is improving, other solutions for email management are required in the interim.

NARA Bulletin 2013-02, The Capstone Approach

Based on the efforts of the NARA Email Management 2.0 group, and the requirements of the M-12-18, NARA released Bulletin 2013-02, [Guidance on a New Approach to Managing Email Records](#)¹³ on August 29, 2013 (known as the “Capstone Bulletin”). NARA Bulletin 2013-02 introduced new guidance to assist agencies in meeting the requirements of Section 1.2 of M-12-18.

In addition to the requirements of M-12-18, NARA created this guidance to aid agencies in dealing with the overwhelming volume of email records and to ensure that NARA receives the permanently valuable email of federal agencies. Even though email has been in wide-spread use in federal agencies for over two decades, NARA has not received significant amounts of

⁹ <http://www.archives.gov/records-mgmt/email-mgmt.html>

¹⁰ All products are available on NARA's website, <http://www.archives.gov/records-mgmt/toolkit/#list>

¹¹ <http://www.whitehouse.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>

¹² <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

¹³ <http://www.archives.gov/records-mgmt/bulletins/2013/2013-02.html>

electronically-managed email through traditional records scheduling policies or traditional records management practices.

The Capstone Bulletin established an additional means of managing and scheduling email records where final disposition is determined by the role or position of the account user, rather than the content of each individual email. This allows email disposition to be carried out in a systematic way, where email within accounts designated as permanent (or other individual emails categorized as permanent, regardless of account status) are transferred to the legal custody of the National Archives, and email within accounts designated as temporary are eligible for eventual destruction. This eliminates the email-by-email review by individual end-users within agencies.

The Capstone approach can generally be summarized with the following points:

- Email is managed in an electronic format in compliance with Section 1.2 of M-12-18.
- Final disposition is based on the role or position of the end-user, not the content of each individual email record.
- Email of senior officials could be scheduled as permanent, eventually being transferred to the legal custody of NARA.
- Email of other federal employees could be scheduled as temporary, with authority for eventual destruction.
- Capstone affords flexibility, allowing agencies to design an approach that fits their technology, business needs, and culture.
- Use of the Capstone approach is not mandatory; agencies may develop other solutions that comply with Section 1.2 of M-12-18.

Agencies are encouraged to manage their email records through a Capstone approach. In addition to creating an agency policy on email and an implementation plan, a Capstone approach is further strengthened by:

- Use of automated solutions to block email from specific domains or email addresses from capture (for example, personal email from the accounts of family members account, material that is clearly personal in nature and not a federal record),
- Use of automated solutions to block duplicates (such as email blasts) from capture, and
- Allowing for manual management; for example, allowing end-users time to apply traditional records management before system capture begins (for example, applying other disposition authorities, or deleting nonrecord material).

NOTE: It is important to note that the implementation of a Capstone approach for the management of agency email does not negate other recordkeeping responsibilities. As outlined in the Capstone Bulletin, agencies may still have a need to cross-file certain email with other records, such as case files or subject files. Agencies will remain responsible for ensuring that all other records, including program and project files, are still scheduled and managed appropriately. NARA will continue to receive other permanent record series from federal agencies outside the Capstone approach.

Between September 2013 and February 2014, NARA provided training to federal agencies on the Capstone Bulletin and the Capstone approach. This effort led to the creation of other resources to assist agencies. These resources are available on NARA's [Email Management webpage](#).¹⁴

SECTION 3: Disposition Authority for Email Records

The guidance provided in the Capstone Bulletin gives agencies guidance on how to develop a Capstone approach that meets their business needs. It does not, however, provide disposition authority for email records. NARA disposition authority, as with any other federal records, is required when using a Capstone approach.

As highlighted above, prior to the release of the Capstone Bulletin, agencies would rely on a multitude of disposition authorities to manage their email. An email related to a personnel matter, for example, would be disposed of in accordance with personnel-related authorities. An email related to a specific project would be disposed of in accordance with the disposition authority related to those project files. One user's entire body of email would often require use of multiple disposition authorities for proper management. Individual end-users were often not equipped with the resources (including knowledge of disposition authorities) to properly manage their email. This increased the risk of either loss of email through improper disposition or the retention of all email for much longer than actually required by current authorities, unnecessarily expends agency resources and puts additional disclosure burdens on the agency.

The Capstone Bulletin allows agencies to propose a disposition schedule where email becomes its own records series, similar to that of correspondence, with specific disposition instructions for entire bodies of email. Email of senior officials, for example, could be approved for permanent retention, while email of all other officials could be approved for temporary retention. NARA's role in approving disposition authorities under the Capstone approach would be twofold: identify senior officials' accounts for permanent retention and determine the appropriate retention for temporary email to meet agency business needs and assure rights and accountability.

¹⁴ <http://www.archives.gov/records-mgmt/email-mgmt.html>

SECTION 4: CAPSTONE GRS DEVELOPMENT

Acknowledging that the majority of federal agencies had an interest in adopting a Capstone approach, NARA next turned its focus to the development of a General Records Schedule (GRS) to provide disposition authority for email records managed under such an approach.

NOTE: The Capstone GRS provides disposition authority for agencies implementing a Capstone approach; it does not provide disposition authority for other email records management strategies. Agencies implementing a Capstone approach must adhere to the definitions provided in this GRS, including the definition of Capstone officials. If an agency cannot adhere to the definitions in the Capstone GRS, they must submit an agency-specific schedule.

The goal of the Capstone GRS is to help agencies meet the requirements of M-12-18. This GRS will allow them to focus on implementation and the management of their email rather than the process of seeking disposition authority from NARA. For NARA, from a government-wide perspective, this GRS will support NARA's oversight responsibilities by reducing subjectivity and increasing consistency in the determination of Capstone officials. The Capstone GRS will establish a baseline understanding of roles and disposition of email across the government. This will reduce the risk of improper implementation.

Development of the Capstone GRS began in May 2013, with the creation of a NARA intra-agency working group. The group consisted of individuals who have a stake, or are subject matter experts, in NARA processes and government-wide records management policy.

The development team, comprised of senior NARA staff in the Office of General Counsel, the Office of the Chief Records Officer, and NARA's Research Services, drafted the GRS and created a supplemental FAQ to provide further guidance to aid in schedule implementation.

Challenges

One of the challenges in developing the Capstone GRS was creating a definition of "Capstone officials"—the definition had to identify those officials whose accounts warrant permanent retention; contain recognizable official positions that would allow for maximum application to various federal agency organizational structures, and ultimately ensure increased transfers of permanently valuable email to NARA.

The efforts to craft this definition resulted in two goals: 1) reduce the possibility of multiple, conflicting interpretations within an agency by developing a clear and understandable definition;

and 2) increase consistency by ensuring that the same type or level of accounts were identified for permanent retention across the Federal Government.

An additional challenge concerned the appropriate retention length for temporary email. The development team had to balance the realities of limited technological resources within federal agencies with the need to maintain temporary email long enough to meet agency business and to assure rights and government accountability. Ultimately, item 011 was crafted for the majority of temporary email within a given agency, with a minimum retention of 7 years. Item 012 was developed as an exception to item 011, allowing for earlier disposition for email in accounts that fall into a very narrow definition of clearly administrative and/or routine duties.

Targeted Focus Group

A targeted focus group was held on May 16, 2014, to solicit feedback from eight agencies on a draft version of the GRS and FAQ developed by NARA staff. The focus group included records management, legal, and information technology officials from several agencies and the discussion focused on the clarity and implementation of the product, including feedback on item descriptions and retention periods, and resulted in changes to the draft GRS.

The focus group illustrated that:

- There was an interest in NARA developing a GRS for Capstone email records.
- Agencies wanted a clear and precise definition of Capstone (permanent) officials, with little room for subjectivity.
- Agencies wanted flexibility in managing temporary accounts, especially for email accounts of very low-level staff performing administrative duties.

Government-wide Review

NARA solicited additional comments on the revised GRS and FAQ drafts via government-wide review in July and August 2014. NARA received comments from numerous agencies. NARA employees also submitted comments during this review period. The number of comments totaled nearly 140. The GRS Development Team adjudicated the comments and made substantial changes to the GRS and FAQ.

Findings from this review included:

- There was an interest in NARA developing a GRS for Capstone email records.
- Agencies required further information about implementation of not only the GRS but also the Capstone approach in general (which were added to the FAQ).
- The definition of Capstone officials needed to be as specific as possible. Earlier versions of the definition were too subjective to ensure proper implementation.
- Flexibility for the temporary email retention was necessary.
- Based on the comments received, NARA should consider a “verification and approval” process for those using this GRS.

Internal Tests

At several points during development of the Capstone GRS the definition of Capstone officials within item 010 (see appendix A) was tested against the organizational structure of several selected agencies. The primary goal was to illustrate whether there could be multiple, inconsistent interpretations of the definition of Capstone official and therefore identify potential issues and risks with these interpretations. Worksheets were created and development team members utilized agency organization charts, [PLUM book](#)¹⁵ entries, and other resources to apply the definition against these agencies. A secondary goal was to increase consistency to ensure that the same type and/or level of accounts could be identified for all agencies utilizing the Capstone GRS. This led to a significant revision of the definition presented in the current draft. The development team saw this as a major step in refining the GRS to ensure proper implementation.

While finalizing this definition, members of the development team acknowledged that more email will likely be transferred as permanent than would have been under application of traditional records management. For example, Capstone may include the email of officials by virtue of their role or position, but who otherwise may not have any other permanent records associated with that role or position. NARA believes this is an appropriate trade-off to ensure that the permanently valuable email is transferred into its legal custody.

Structure of the Capstone GRS

The final draft of the Capstone GRS accounts for all the previously mentioned factors in three separate items:

Item 010: Provides disposition authority for the email of senior officials (i.e., Capstone officials). The item includes a definition of Capstone officials broken down into nine categories and identifies those positions that are required for inclusion when an agency is using this GRS. Please refer to the draft Capstone GRS (Appendix A) for further description of these categories.

The nine categories were created after considering all comments, and after significant review of agency organizational structures. Although the implementation of this GRS may not assure that all permanently valuable email is transferred to NARA, or prevent non-permanently valuable email from being transferred, the Capstone GRS development team felt confident that this definition appropriately identifies permanent Capstone roles and/or positions.

Item 011: Provides disposition authority for the email of all other officials not included in either item 010 or 012. This item is intended to be used for the majority of email managed within a given agency. It sets a minimum retention of 7 years. The item does, however, authorize a longer retention based on agency business needs.

¹⁵ Every four years, just after the Presidential election, the United States Government Policy and Supporting Positions, commonly known as the PLUM Book, is published, alternately, by the Senate and the House. The PLUM Book is used to identify presidentially appointed positions within the Federal Government. <http://www.gpo.gov/fdsys/pkg/GPO-PLUMBOOK-2012/content-detail.html>

Although some large agencies have expressed concern about the cost of retaining very large volumes of temporary email for seven years, NARA believes that a baseline, seven-year retention for the preservation of temporary email records is appropriate. This will not only meet agency business needs, but also ensure adequate and proper documentation of the policies and transactions of the Federal Government. The preservation of these records for this period of time should generally provide for the adequate defense of the Federal Government in litigation. This presumptive retention period is consistent with most statutes of limitations to pursue matters against the United States, which is generally six years. Additionally, this retention period aligns to recordkeeping requirements set forth by Congress, such as the seven-year retention for audit-related records established in the financial reforms of Sarbanes-Oxley, and with the IRS's seven-year retention period for personal tax records, which is tied to the six-year statute of limitations for criminal violations of the tax code (26 U.S.C., § 6531). These examples, along with others, have led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records.

Item 012: Provides disposition authority for a very small subset of email. NARA developed this item based on feedback received during the agency focus group and during government-wide review. It acknowledges that there is a group of employees in purely administrative or support positions that receive email related to very specific, administrative and/or routine duties. Additional guidance is provided in the FAQ to assist agencies in using this item appropriately. It is expected that the majority of temporary email accounts within an agency should be disposable under item 011, which has a minimum retention of 7 years, rather than under item 012.

The draft also includes instruction and guidance on *culling*¹⁶ within the introduction of the GRS and further within FAQs 19 - 22. Culling was incorporated into the guidance as a result of both internal and external comments, specifically:

- Agencies wanted the flexibility to allow users (or IT administrators) to cull personal and/or nonrecord material. Some agencies expressed concern of personal email being released as part of the permanent record.
- NARA custodial units wanted to reduce the amount of duplicate material and nonrecord material found in transfers of permanent records.

Culling aligns with the requirements of the Federal Records Act, and is a principle of good records management. The Federal Records Act directs that nonrecord material be managed by the agency, and purged when no longer needed; NARA's approval is not required to destroy such materials ([36 CFR 1225.18\(c\)](#)). Culling assists in assuring that clearly nonrecord material is not transferred with permanent records.

Although NARA determined that culling is not mandatory due to the technological limitations of

¹⁶ *Culling*, in the context of Capstone implementation, is the act of removing or deleting material prior to disposition. This may include deletion of email blasts (such as agency-wide communications), spam, personal email (records belonging to an individual and not related to agency business), and/or transitory email (records of short term interest or that have minimal documentary or evidentiary value).

some email systems, culling is desirable to the greatest extent practicable. NARA email management resources include guidance on the use of automated tools within email applications that could, for example, exclude email from specific email addresses and/or specific domains from capture. The flexibility within the Capstone approach allows for manual, automated, or a hybrid of both manual and automated culling.

Although NARA's culling expectations will potentially reduce the volume of nonrecord material transferred, NARA accepts that some amount of personal, duplicate, and nonrecord material will likely be transferred as part of the permanent record. FAQs 20 through 22 further document the importance of culling, and NARA's role in culling after permanent email records have been transferred to NARA.

The Capstone GRS FAQ

To assist in the implementation of the Capstone GRS, NARA developed the Capstone GRS FAQ. The final draft of the Capstone GRS FAQ includes 23 questions that further explain additional resources available, general implementation, verification requirements, differences between items, transfer of permanent accounts, culling, and acceptable formats. The FAQ should be used in conjunction with the GRS.

Verification and Approval Process

To further address implementation challenges, the development team concluded that a "verification and approval" process is necessary for those agencies utilizing this GRS. This verification and approval process will allow NARA oversight of the identification of positions and ensures they are identified consistently across the Federal Government. Several agencies have also expressed a desire to have some form of NARA approval of their Capstone officials prior to implementing Capstone and the Capstone GRS. A verification and approval process will increase an agency's confidence in implementing Capstone appropriately while ensuring NARA is fulfilling its oversight responsibilities.

This verification process will require agencies implementing this GRS to submit a NARA form (number pending), *Verification for Implementing GRS 6.1*, to receive approval prior to implementation of any items of this GRS (see Appendix C). The form serves as either a list of permanent Capstone officials for implementation of item 010, or a list of positions excluded from implementation of items 011 and 012.

The instructions for the verification form define the nine categories of senior officials provided in the definition of Capstone (permanent) accounts in item 010. These definitions acknowledge that different agencies often use different titles for similar positions and are meant to assist agencies in properly identifying those senior officials within their agency that correlate to each category.

The NARA development team is still refining the process of verification and approval. Procedures will be released with the formal transmittal of the Capstone GRS.

Next Steps

NARA will be publishing the draft GRS in the Federal Register for public comment in April 2015. NARA will also hold a public meeting in May 2015 to address any comments or concerns interest groups or the public may have regarding the draft GRS. All comments received either through the Federal Register publication process, or the public meeting, will be adjudicated. Final GRS transmittal is planned for September 2015.

APPENDIX A: THE CAPSTONE GRS

GENERAL RECORDS SCHEDULE 6.1: EMAIL MANAGED UNDER A CAPSTONE APPROACH

This schedule applies ONLY to Federal agencies that implement a Capstone approach as described in this GRS. When implementing this GRS, agencies should consult the FAQs about GRS 6.1, Email Managed under a Capstone Approach. Agencies are reminded that this GRS should not be implemented in isolation, and should be supplemented with agency-wide policies and training, as well as incorporated into agency records management implementation tools, such as manuals and file plans. Agencies adopting a Capstone approach should also consult other resources available from NARA related to email management, specifically the Capstone approach. These resources are available on NARA's [email management page](#) and are summarized in the introduction to the FAQ.

Agencies must not implement this GRS until approval of [NARA form XXXX \(NA-XXXX\), Verification for Implementing GRS 6.1](#). Additional information, including a link to the form, may be found in FAQ 3 and in the instructions accompanying the form.

GRS Scope

Email can be managed at an account level, at a mailbox level, in personal folder files, or other ways. This GRS applies to all email, regardless of how the email messages are managed or what email technology is used. Email, in the context of this GRS, also includes any associated attachments. This GRS may apply to records affiliated with other commonly available functions of email programs such as calendars/appointments, tasks, and chat.

Each agency is responsible for determining the scope of implementation when using Capstone, including:

- The range of implementation in an organization (agency-wide, specific office, etc.);
- The range of implementation regarding email technology and system platforms;
- The parameters for inclusion of day forward/active and/or legacy/inactive email; and
- The extent of inclusion of classified email.

Brief information on the scope of an agency's Capstone implementation is also required on the NARA form XXXX (NA-XXXX), *Verification for Implementing GRS 6.1*.

Agencies are also responsible for defining (and documenting through policy) the official recordkeeping version of email to be managed under a Capstone approach, especially when email is captured or retained in multiple locations (e.g., an email archive vs. the live system). All other versions of email can be considered nonrecord, the retention of which should be addressed in agency email policy.

that NARA is able to provide adequate oversight of the implementation of this GRS by reducing subjectivity and ensuring consistency in implementation across agencies.

Additional changes consisted of separating the original single temporary item into two items with different retention lengths. NARA acknowledges with this addition that there may be a group of employees in purely administrative or support positions that do not need to be retained for agency business needs for as long as other temporary email. The description for permanent Capstone Officials was also refined to provide clarity and greater scope of applicability to the various structures and positions present in Federal agencies. This new definition was further tested using a sampling of agencies to determine if the desired permanent accounts would be captured across various types of agencies. The definition was further refined and narrowed based on these results. This did not drastically alter the definition.

Appraisal of this GRS

The appraisal for this schedule was derived from, and aligns with, the NARA Email Management 2.0 project conducted between 2011 and 2013, and which led to the issuance of Bulletin 2013-02. Hence, this appraisal was less focused on the content of individual email messages, and based more on the responsibilities and roles of typical senior-level Government officials. In a sense, therefore, this was an appraisal of the functions of specific roles and positions within the Federal Government, rather than appraisal of specific content. Significant focus was paid to the definition of Capstone officials (the permanent accounts) provided in item 010 in order to develop a minimum list that would capture and be representative of the wide range of agencies and differing organizational structures. Focus was placed on those positions high enough within an agency to ensure that the email captured represents policy formulation, mission implementation, and other discussions or actions of high importance within an agency. Several sources were consulted in the development of this definition, including the Government Manual, the United States Government Policy and Supporting Positions (PLUM) Book, a sampling of agency organization charts, a sampling of founding legislation, existing schedules for other records related to policy-making, and direct feedback from agency personnel.

NARA believes that this schedule for the following items meets our policy, authority under laws and regulations, and mission. Please see *White Paper: The Capstone Approach and Capstone GRS* for more information on Capstone appraisal and the appraisal process.

Overall Recommendation

We recommend approval of this schedule.

APPRAISAL

Item 0001: [010] Email of Capstone Officials

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that remains after any culling activities for all positions and roles that meet the definition provided within the item description.

Proposed Disposition: Permanent

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Documents significant actions of Federal officials. Email of high-ranking officials includes details on policy development, decisions, implementation, and other mission-related actions and documentation.

- * High potential research value.
- * Permanent email of Capstone officials compliment and correlate to other records series scheduled as permanent in Federal agencies and residing in the holdings of NARA. Some of this email may be duplicative of some records in those other series; however, capturing these officials ensures that NARA is receiving a comprehensive collection of permanently valuable email from high-ranking roles or positions in the Federal Government, which NARA may not otherwise receive.

Adequacy of Proposed Transfer Instructions: Adequate. The 15 year transfer is proposed due to the sensitive nature of most senior level email communications, and to align with the typical transfer time for permanent records pursuant to Research Services' guidance. The caveat related to declassification allows for longer retention prior to transfer for those agencies that have classification authority, and classified email.

Media Neutrality: Not approved. Records are exclusively electronic.

Item 0002: [011] Email of Non-Capstone Officials: All Others Except Those in Item 012

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that remains after any culling activities and for all positions and roles not covered by items 0001 [010] or 0003 [012]. This item, therefore, is the default item for email that does not fit into the definitions provided in items 0001 [010] or 0003 [012], and will include email that, although it does not have permanent value, is required for agency business use, including assurance of accountability.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Does not document significant actions of Federal officials. Email of senior officials, including those primarily responsible for policy formulation, will be captured in item 0001 [010].
- * Little to no research value. The positions and roles covered under this item are not typically associated with policy creation or other high-level actions, or in cases where they are, the documentation is also captured within the accounts of higher officials covered by item 0001 [010].
- * Per NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone], records are still required to be filed in case files and in other recordkeeping systems when appropriate, so records of a more substantive and/or significant nature will be captured in other scheduled series at agencies.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. Based on feedback received during the targeted focus group, this item sets a minimum retention of 7 years, but authorizes agencies to implement a longer retention based on business and legal needs. NARA believes that a baseline, seven-year retention for the preservation of temporary email records is appropriate, not only to meet agency business needs, but also to ensure adequate and proper documentation of the policies and transactions of the Federal Government. The preservation of these records for this period of time should generally provide for the adequate defense of the Government in litigation or the vindication of rights by a plaintiff in the event the Government has infringed on such rights. This presumptive retention period is consistent with most statute of limitations to pursue matters against the United States, which is generally six years, with recordkeeping requirements set forth by Congress, such as the seven-year retention for audit related records established in the financial reforms of Sarbanes-Oxley, and with the IRS's seven year retention period for personal tax records, which is tied to the six year statute of limitations for criminal violations of the tax code. These examples, along with others, have led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records. This Capstone GRS does, however, allow agencies to elect a shorter retention using item 012 (3 years) for very specific roles and positions. Questions in the FAQ provide additional guidance on agency's determining the appropriate

period for email based on their own unique business and legal needs, and the importance of creating policy and training around Capstone. This includes when it may be appropriate to use this item instead of item 0003 [012] for temporary positions and roles.

Media Neutrality: Not approved. Records are exclusively electronic.

Item 0003: [012] Email of Non-Capstone Officials: Support and/or Administrative Positions

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that is not related to positions or roles covered by item 0001 [010] (permanent accounts), but which relates to non-supervisory and routine and/or administrative positions and functions within an agency.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Does not document significant actions of Federal officials. Email of senior officials, including those primarily responsible for policy formulation or other high-level actions, will be captured in item 0001 [010]. Email that is temporary, but related to more substantive functions in the agency, must be managed under item 0002 [011].
- * Little to no research value. The positions covered under this item are associated with non-supervisory, administrative and/or routine activities.
- * Per NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone], records are still required to be filed in case files and in other recordkeeping systems when appropriate, so records of a more substantive and/or significant nature will be captured in other scheduled series at agencies.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability.

The GRS sets a minimum retention band of 3 years based on feedback received during the targeted focus group. Agencies at this meeting were able to identify certain accounts/positions that will contain substantially nonrecord and duplicative email, or email related to routine business actions (such as customer service based operations, etc.), which may be appropriate for a lower retention period. NARA agrees and acknowledges with this item that there may be a group of employees in these types of roles and/or positions that do not need to be retained for agency business needs for as long as temporary email in item 0002 [011]. However, NARA believes that email from these types of roles and/or positions should be retained for at least a minimum of 3 years to ensure adequate and proper documentation of the policies and transactions of the Federal Government. Questions in the FAQ provides additional guidance on agency's determining the appropriate period for email based on their own unique business and legal needs, and the importance of creating policy and training around Capstone.

Media Neutrality: Not approved. Records are exclusively electronic.

Sean A. Curry
Appraiser

Meredith L. Scheiber
Appraiser

APPENDIX E: TARGETED FOCUS GROUP ATTENDEES

Central Intelligence Agency

Department of Defense, Department of the Navy

Department of Defense, Office of the Secretary of Defense

Department of Labor

Department of Labor, Bureau of Labor Statistics

Department of State

Department of the Interior, Office of the Secretary

Social Security Administration

APPENDIX F: GOVERNMENT-WIDE REVIEW COMMENTERS

Central Intelligence Agency

Department of Agriculture, Food and Nutrition Services

Department of Commerce

Department of Defense, Department of the Navy

Department of Defense, Office of the Secretary

Department of Education

Department of Justice, Federal Bureau of Investigation

Department of Labor, Bureau of Labor Statistics

Department of Veterans Affairs

Social Security Administration

U.S. Commodity Futures Trading Commission