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Case Study 1:
Working with Stakeholders to Create/Influence Policy
North Carolina TOMES Project

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Background

The mission of the State Archives of North Carolina (SANC) is to collect, preserve, manage and provide access to information that protects citizen rights, documents North Carolina history and culture, promotes transparency, and encourages stewardship of government records. Our vision is to be a national leader in providing quality guidance on information stewardship in North Carolina and in creating simplified and integrated access to authentic information. This vision is outlined in North Carolina's General Statutes 132 and 121, which describe our dual purposes within the state: to provide guidance concerning the preservation and management of government records to state, county, city, and state university officials; and to collect, preserve, and provide access to historically significant archival materials relating to North Carolina.

SANC's electronic records program began in 2001 with the transfer of 5 GB from the administration of Governor Jim Hunt, which was primarily made up of data from the governor's decommissioned e-mail servers. In 2007, the North Carolina Digital Repository was formally established with the purchase of dedicated storage space as part of the Electronic Mail Capture and Preservation (EMCAP) grant, an NHPRC grant in which North Carolina partnered with Pennsylvania and Kentucky to begin investigating the management of email. In the 10 years since its establishment, the North Carolina Digital Repository, a joint program of SANC and the State Library of North Carolina (SLCN), has continued to grow, having collected nearly 80 TB of electronic records and archival material to date, and that volume grows as information is increasingly created and stored in a digital environment. Throughout the development of the repository, SANC and SLNC have developed policies and procedures to support its growth and governance.

Additionally, Governor Pat McCrory signed Executive Order 12 on May 21, 2013, which ordered a five-year retention for all state agency emails. In 2015, SANC received a three-year grant from NHPRC for Transferring Online Mail with Embedded Semantics (TOMES). TOMES partners SANC with the Utah State Archives and Records Services and the Kansas Historical Society to build off the success of EMCAP to achieve the following deliverables:

- Identify archival e-mail accounts based on Capstone methodology;
- Produces a cross platform .pst to EAXS XML parser;
- Publish an NLP dictionary designed to flag named entities unique to government at the state and local level;
- Develop training materials for internal and external stakeholders;
- Process at least 10 e-mail accounts designated as containing permanently valuable; and correspondence based on Capstone roles.

This paper will focus on the goal of developing a Capstone role-based program for e-mail retention within state government. While the TOMES grant is working to test a few accounts, the larger plan is to develop and institutionalize a comprehensive system of identifying accounts with permanently valuable e-mail.

Methodology

The primary goal of TOMES is to provide solutions to state government agencies that are feasible to implement. Due to the volume of e-mail that most state employees receive daily, the review of individual e-mails and categorizing them based on content and archival value is not a feasible or realistic solution. To that end, the TOMES seeks to develop a way of identifying Capstone positions and transferring them to the custody of the Archives. The Digital Services Section (DSS) staff at SANC worked with the Government Records Section (GRS) staff to identify those Capstone positions. The Government Records Section includes the Records Analysis Unit (RAU), which works with state agencies to develop records retention schedules and disseminate records management best practices. RAU staff looked at the Capstone identification forms developed by the National Archives, and adapted them into a series of three forms that would meet the needs of state government. The first form collected information about high-level, senior officials in the agency. The second form identified positions that routinely use e-mail to document core agency functions that directly support the agency's goals and mission. The third form identified positions that create official records documenting agency policies and decisions.

Each form included appraisal criteria for the different types of positions we felt would create archival records, the position name, position number, the information on the person currently in the position, and the information on employees in the position for the previous five years. The forms were sent to state agency Chief Records Officers (CROs) in advance of the annual CRO meeting with the Archives. The first form was based solely on agency hierarchy. Using known organizational charts, the records analysts provided CRO's with basic information on higher level administrative positions that we wanted to capture. A few weeks later, form two was sent, followed by form 3 a few weeks after. By the CRO meeting, all the forms had been distributed, which gave CROs the opportunity to use the meeting for questions about the forms

and grant. The analysts also continued to follow up with CRO's through e-mail and individual meetings to get the completed forms and answer any questions. In some cases, the analysts facilitated meetings between the CRO's and members of the TOMES team to clarify the goals of the grant and our timeline.

The data gathered was then entered into spreadsheets by agency, with a sheet in each to record previous holders of the positions for the past five years. This workflow has been repeated once, before the 2017 CRO meeting. We anticipate an annual CROs review, as well as the development of a workflow and form for ad hoc changes to Capstone positions.

Challenges

One of the main challenges to identifying Capstone positions was buy-in from agencies. In the first year, most agencies returned the first form, but significantly fewer agencies returned the second, and almost none returned the third. For some agencies, this was simply due to a low level of interest from their CRO. However, a few agencies were very unwilling to participate in the program. One agency had their general counsel call the analyst, digital archivist, and systems integrations librarian at the archives to voice their concerns, particularly regarding attorney client privileged information that may be contained in their emails. Another agency sent a letter to the State Archivist, informing her that they would not be participating in the program, and questioned our assertion that e-mail is a public record, and that the archives had the authority to collect their records. We also found that some agencies were more willing to participate after face-to-face meetings with their analysts to discuss the project and learn more about what we hoped to achieve. The analysts frequently heard concerns about losing control of their e-mail data once it is turned over to the State Archives. While many agencies want solutions for automatic e-mail capture, automated processes also ask agencies to cede control over that e-mail. In a medium that allows for the co-mingling of confidential and non-confidential information, concerns about security and confidentiality in state government are common, and agencies were reluctant to give up control of the records.

There have also been challenges in trying to automate the process of tagging Capstone positions using unique position numbers. The Department of Information Technology (DIT) has been eager to implement Capstone, as it would allow them to clear up storage space and delete non-archival email after its retention had been met. Currently, all state agency e-mail is on a legal hold, because there is not a good system in place to ensure that archival records are being transferred to SANC. The promise of being able to ensure the transfer of archival e-mail and destroy records as per the retention set by Executive Order 12, clearing storage and saving the state money has certainly helped the grant team get buy-in from DIT. However, creating a functioning automated system has presented several challenges. In working with DIT, communicating our needs and workflows has at times proven challenging. While there are obvious advantages to a Capstone approach for DIT in theory, the challenge of working with a large bureaucratic agency to translate that theory into practice has proved difficult. DIT, like other agencies, is concerned about security and confidentiality of e-mail transfers. Additionally,

because position numbers have proven to be the best way to identify positions by a unique identifier, we have had to explain our needs to groups that we had not anticipated working with for this project, such as human resources (HR) staff. SANC staff are continuing to meet with DIT and HR staff to meet this goal.

Once we began analyzing the data we did receive from state agencies, there was a question of how to use that data to appraise the positions as actually creating and receiving archival resources. At first, the team discussed loading some of the inactive accounts from forms 2 and 3 and appraise them by looking at the content of those accounts, but it became quickly apparent that, since individuals do not use their e-mail the same way, that the approach would not be helpful. However, GRS staff have begun to look at job descriptions for the position numbers, and to determine the scope and function of the position in the organizational structure of the agency. By appraising the position in the context of the agency, the analysts will be able to identify positions who also would conduct business primarily via email, such as approving plans, or issuing permits.

A final challenge that has been encountered is how to make the Capstone approach sustainable in state government. Continued involvement by individual agency personnel is needed to maintain up-do-date position numbers. However, there can be a high rate of turnover in state government, due to administration changes, retirements, and separations. To maintain agency involvement over time, GRS staff and the TOMES team must continually provide education and outreach to agencies to maintain buy-in. This requires a lot of time and energy, especially since, as mentioned earlier, analysts found that they were most successful in getting buy-in from agencies when they met with CRO's in person.

Lessons Learned
Throughout the TOMES project, communication has continued to be the most important takeaway. Particularly with DIT staff, where digital archivists and IT specialists may be separated by a common language, we have learned that the best way to get buy-in from stakeholders to affect policy is to communicate clearly about what you want, including the timeline of your project and how the project will affect them. Effective advocacy also means communicating how the project and new policy will benefit their operations frequently, and in different forums.

Ironically, we've learned that e-mail is not necessarily the best way to communicate with stakeholders about our needs, nor is it the most efficient way to manage a project. We have implemented tools, like Teamwork software, to manage our project and track progress. This has helped all team members, across sections and institutions, understand what is needed from them and when. Non-email interactions have been far smoother and more productive than a series of e-mails, whether it is a phone call, where questions can be answered quickly and unfamiliar terms explained, or an in-person meeting where we can share and understand our colleagues' concerns. It has also involved more staff in the grant than we anticipated when we wrote it. To communicate our goals, we have needed all hands-on deck to succeed.

We have also learned that a project like TOMES can be used to keep conversations going with agencies about electronic records in general. Until we can automate the tagging of Capstone positions, it is important to keep our project in the front of the minds of CROs so that our information remains up-to-date and position numbers are routinely identified as archival. To that end, we have found that reminding them at least annually before the CRO meeting is a useful way to keep e-mail archiving on their radar. Additionally, these annual reminders give records analysists a chance to introduce the TOMES project to new CROs, and potentially get buy-in from agencies where the former CRO was not as cooperative.

TOMES has illustrated the importance of building relationships with mid-level DIT personnel, such as unified communications and programmers for the personnel database to maintain progress on the goal. Communication with high level people within the agency is important, but turnover in those positions is high. Solid relationships with technical and mid-level staff have helped us tremendously in continuing to advocate for the project, even after an administration change, and delivering on our idea of tagging position numbers.

Future Work
The team in NC is continuing to work with DIT to create solutions to connect BEACON, the NC human resources platform, to e-mail archiving and Office365. It is hope that these solutions will have ramifications for managing records in other cloud-based Office365 tools, like OneDrive, where currently the materials stored there are deleted once an employee leaves state government. We are also trying to capitalize on this framework to provide a governance model for other DIT tools. Our hope is to develop an automated trigger to be sent to the archives when a Capstone position is vacated, so that the digital archivist can use the eDiscovery module in Office365 to locate and download the official's e-mail account.

There is also development of several workflows with GRS. SANC and DIT will be developing a workflow for the transfer of Capstone accounts once the employee leaves their position, including who will trigger the transfer. Currently there is some question if this will come from DIT or the state agency. New Capstone identification forms are also being developed for ad hoc edits that happen between annual CRO meetings. This form will be a simplified version of the Capstone identification form so that CROs will not have to identify which form they need for simple, one-time updates. Once the form is complete, we will be developing workflows for their use and its tracking.

Summary
TOMES has allowed SANC to reach out to agencies across state government to begin solving the problem of e-mail archiving in state government. By building relationships, and harnessing existing ones, we have been able to gather information on the structure of state agencies and identify Capstone positions. We have particularly found that analysts' conversations with agencies regarding Capstone have created the opportunity to have broader discussions regarding electronic records management and transfer to the archives. Additionally, our work on automated tagging of Capstone accounts has lead us to build relationships with DIT staff and

help us articulate our special use case, and what exactly our division does. We hope that these relationships will continue to be fruitful as we continue to develop our electronic records program and continue to be a special use case within state government for technology. We continue to work with agencies to harness technological solutions to create a sustainable e-mail archiving policy.