

# Capstone: A New Approach to Managing Email Records

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## **AGENCY WORKSHOP**

**NATIONAL ARCHIVES AND RECORDS ADMINISTRATION  
OFFICE OF THE CHIEF RECORDS OFFICER  
SEPTEMBER 12, 2013**

# Section I: Introduction and Welcome



# Capstone: Agenda

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- Section I: Introduction and Welcome
- Section II: New Approach to Managing Email Records
- Section III: Where to Start
- Section IV: Legal Considerations
- Section V: Capstone Approach Scope
- Section VI: Implementation Factors
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## Section II: New Approach to Managing Email Records

# Section II: New Approach to Managing Email Records

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## Current Situation

- Very few agencies manage their email records electronically.
  - Most agencies rely on a print-and-file strategy for email.
  - Several agencies are already capturing and storing emails in some type of repository, even if not for recordkeeping purposes.
- Use of some DOD 5015.2-STD certified systems can be no less burdensome than “print and file” because they may still require employees to “click and file” individual email.
- Loss of permanent electronic email.

# Section II: New Approach to Managing Email Records

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## The Challenge

- All Federal email must be managed in accordance with the Federal Records Act.
  - Traditionally, user intervention is necessary to ensure that email records are retained for as long as required.
- Volume of email has made compliance difficult.
  - Of greatest concern to NARA is ensuring that email records appraised as permanent are preserved by agencies and transferred to NARA.
  - Agencies also have an interest in ensuring that email is maintained for a sufficient period of time to conduct their business.

## Section II: New Approach to Managing Email Records

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### Managing Government Records Directive

- Managing Government Records Directive, Goal 1.2, requires agencies to manage all email electronically by December 31, 2016.
- Directive Action A2 requires NARA to create new email guidance:

“By December 31, 2013, NARA will issue new guidance that describes methods for managing, disposing, and transferring email.”

## Section II: New Approach to Managing Email Records

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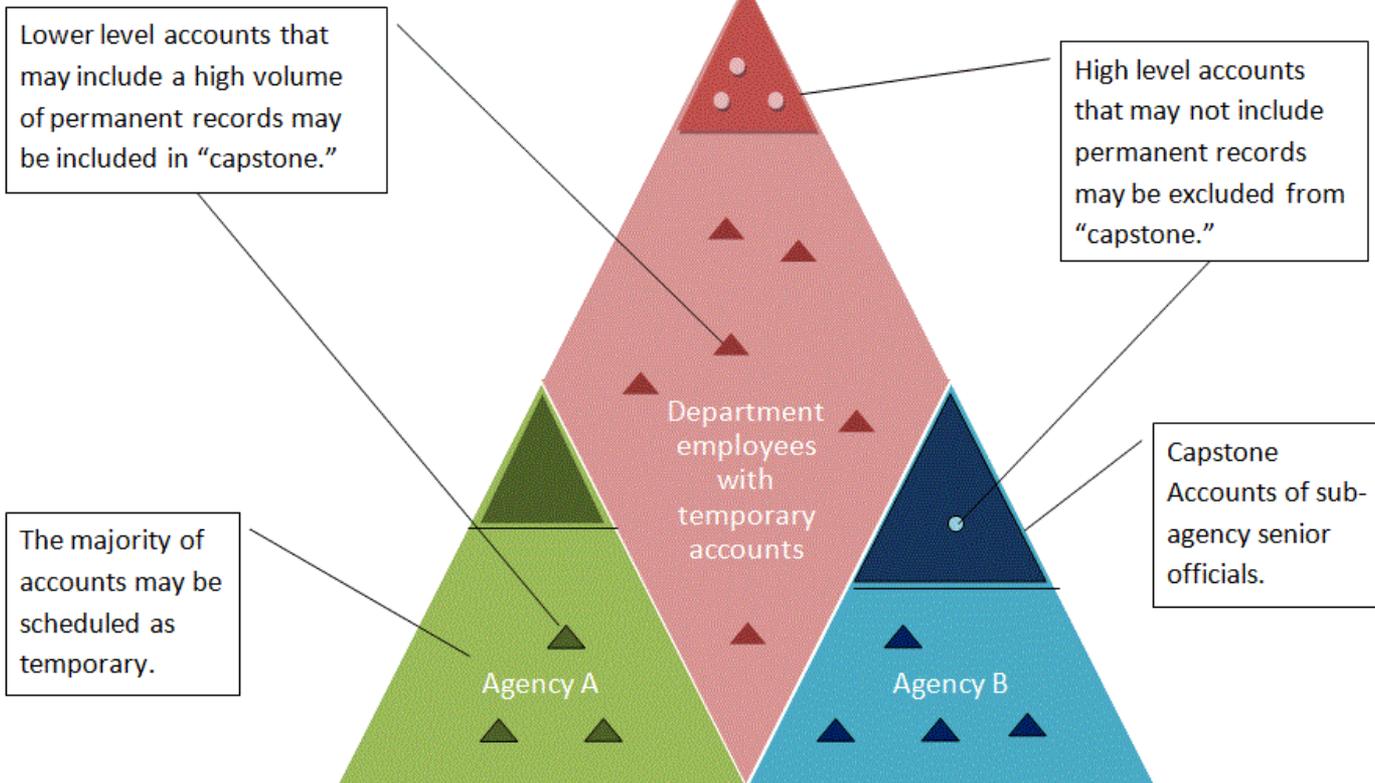
### Solution—Capstone Concept

- Reduce the use of item by item filing to make email management easier for end users.
- Manage email records at the account level.
- Leverage the agency's existing technology rather than requiring the purchase and use of specific technology.
- Allow for the disposition of clearly temporary accounts, while identifying and capturing permanently valuable email accounts.

# Capstone Accounts

Example: Capstone implementation at a Department with two sub-agencies

## Capstone accounts of Department AB



# Section II: New Approach to Managing Email Records

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## Capstone Bulletin—Overview

- Capstone is not a software application, it is an approach.
- Capstone provides an additional option for managing email records.
- Capstone is not mandatory.

# Section II: New Approach to Managing Email Records

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## Capstone Bulletin—Overview

- Capstone is flexible, and allows for various implementation approaches.
  - Allows for the systematic transfer of email accounts scheduled as permanent.
  - Allows for the systematic disposal of entire email accounts scheduled as temporary.

## Section II: New Approach to Managing Email Records

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### Capstone Bulletin—Overview Continued

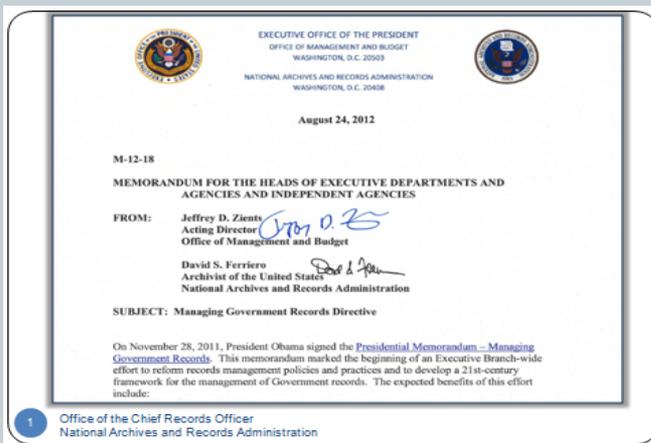
- Agencies may remove transitory, nonrecord, and/or personal messages.
- Emails can be managed at the account level, rather than on an individual message basis.
  - Work of the end-user determines status of the account.

# Section II: New Approach to Managing Email Records

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## 1. What is the Purpose of this bulletin?

- Lays out NARA's new approach to managing email and its relationship to:
  - Presidential Memorandum on Managing Government Records and
  - OMB/NARA M-12-18 Managing Government Records.



# Section II: New Approach to Managing Email Records

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## 2. What is the Capstone approach?

- Simplified approach to email management based on work or position of account holder.
- Capstone accounts are scheduled as permanent.
- Other accounts may be scheduled as temporary.
- Agencies may remove transitory, nonrecord, and/or personal messages depending on their needs.

## Section II: New Approach to Managing Email Records

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### 3. What are the benefits of the Capstone approach?

- A Capstone approach may:
  - Provide a practical approach to managing legacy email accounts.
  - Cut down on print and file and related approaches.
  - Capture permanent email for transfer to NARA in an electronic format.
  - Leverage existing technologies in order to help agencies meet Goals 1.1 and 1.2 of the Directive; agencies will manage all permanent electronic records in an electronic format by 2019 and manage all email electronically by 2016.

## Section II: New Approach to Managing Email Records

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### 4. What should an agency consider before deciding to use the Capstone approach?

- Bulletin provides a list of questions.
- If an agency decides to use a Capstone approach; agencies must:
  - Determine which accounts they want to designate as permanent and schedule or apply existing authorities accordingly.
- Agencies are encouraged to consult with their NARA Appraisal Archivists to determine the appropriate strategy for managing email records created in their agency.

# Section II: New Approach to Managing Email Records

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## 5. Does Capstone change agencies' recordkeeping responsibilities?

- The approach can reduce the burden on end-users.
- Agencies still must:
  - Schedule records
  - Protect integrity and authenticity
  - Maintain access and usability
  - Determine if email records should be filed with related records
  - Capture and maintain metadata



## Section II: New Approach to Managing Email Records

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### 6. How do agencies identify Capstone email accounts?

- Based on agency business processes that create or receive permanently valuable email.
- Does not have to be limited to high-level agency officials.
- Bulletin includes a list of possible officials, suggests use of the “Plum Book,” “U.S. Government Manual,” but does not require either.

## Section II: New Approach to Managing Email Records

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### 7. Must agencies use a specific technology to implement Capstone?

- Capstone implementation is NOT dependent on a specific technology.
- Agencies may leverage existing technologies, including current email applications.
- Agencies must have policies, procedures, and training to fully implement Capstone.

# Section II: New Approach to Managing Email Records

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## 8. How does NARA's Pre-accessioning policy apply to Capstone?

- Pre-accessioning is encouraged for all permanent electronic records, including email accounts captured using a Capstone approach.



# Section II: New Approach to Managing Email Records

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## 9. What other NARA resources are available?

- Provides a list of references for our agency customers; especially:
  - Records Express: The official blog of the Office of the Chief Records Officer at NARA
  - Toolkit for Managing Electronic Records



### Records Express:

<http://blogs.archives.gov/records-express/>

## Section II: New Approach to Managing Email Records

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### 10. Whom should I contact for more information?

- The agency's NARA Appraisal Archivist (see Bulletin for further information).



## Section III: Where to Start



# Section III: Where to Start

- Each Agency should:
  - Begin discussing if Capstone is right for them, especially in regards to M-12-18, section 1.2; agencies will manage all email in an electronic format by December 31, 2016.
  - Determine the resources and tools available to assist with Capstone approach decision-making.
  - Determine the stake-holders needed for Capstone discussions and decisions.



## Capstone Planning Checklist

This checklist will assist agencies with planning and implementing a Capstone approach at their agency.

There are various ways to implement a Capstone approach. Agencies should develop an implementation plan for a Capstone approach that meets their business and legal needs. Federal agencies are encouraged to consider Capstone as an approach that may help them meet the requirements of section 1.2 of the Managing Government Records Directive (M-12-18), which states that agencies will manage all email electronically by December 31, 2016.

### Current Email Management Program

My agency's current email management:

- yes  no Practices and policies are compliant
- yes  no Storage capacity is affected by legacy email
- yes  no Legacy email is managed
- yes  no Solution meets our business needs and requirements
- yes  no Solution complies with M-12-18

If you answered "no" to any of the above, then a Capstone approach should be considered.

### Agency Stake-Holder Involvement

Which agency stakeholders listed below should be involved in the planning and implementation of a Capstone approach?

- SAO for Records Management
- Agency Records Officer
- Departmental Records Officer, if applicable
- Chief Information Officer
- General Counsel
- FOIA Office Representative
- Privacy Office Representative
- NARA Appraisal Archivist
- General Public
- Other Stakeholders, e.g. Procurement Staff

### Legal Considerations

Does my agency's Capstone approach:

- yes  no Conflict with other regulations and/or requirements
- yes  no Address FOIA requirements
- yes  no Address Privacy Act requirements
- yes  no Mitigate my General Counsel's concerns regarding Capstone implementation
- yes  no Other

# Section III: Where to Start

- Assess and evaluate your agency's current email management:
  - What are your Agency's email management practices and policies?
  - What is your email platform and storage capacity?
  - What records management challenges has your Agency experienced?
  - Other factors:
    - ✦ Legal issues
    - ✦ Classified email
    - ✦ Future IT and budget resources



# Section III: Where to Start

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- Does your Agency's current email solution meet the requirements of M-12-18, section 1.2; all emails are managed in an electronic format?
  - Is it meeting other agency business needs and requirements?
- Can Capstone help?

## Section III: Where to Start

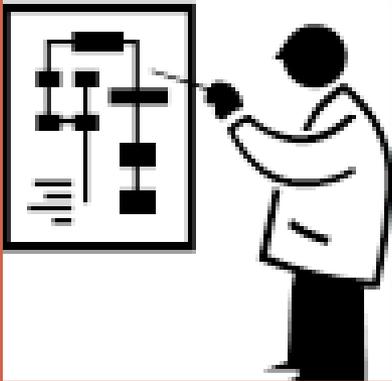
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- Get the right people involved in the conversation...
  - Senior Agency Official (SAO) for Records Management
  - Agency Records Officer
  - Departmental Records Officer, if applicable
  - Chief Information Officer / IT Staff
  - General Counsel
  - FOIA Office Representative
  - Privacy Program Representative
  - NARA Appraisal Archivist
  - Other stakeholders, e.g. procurement staff



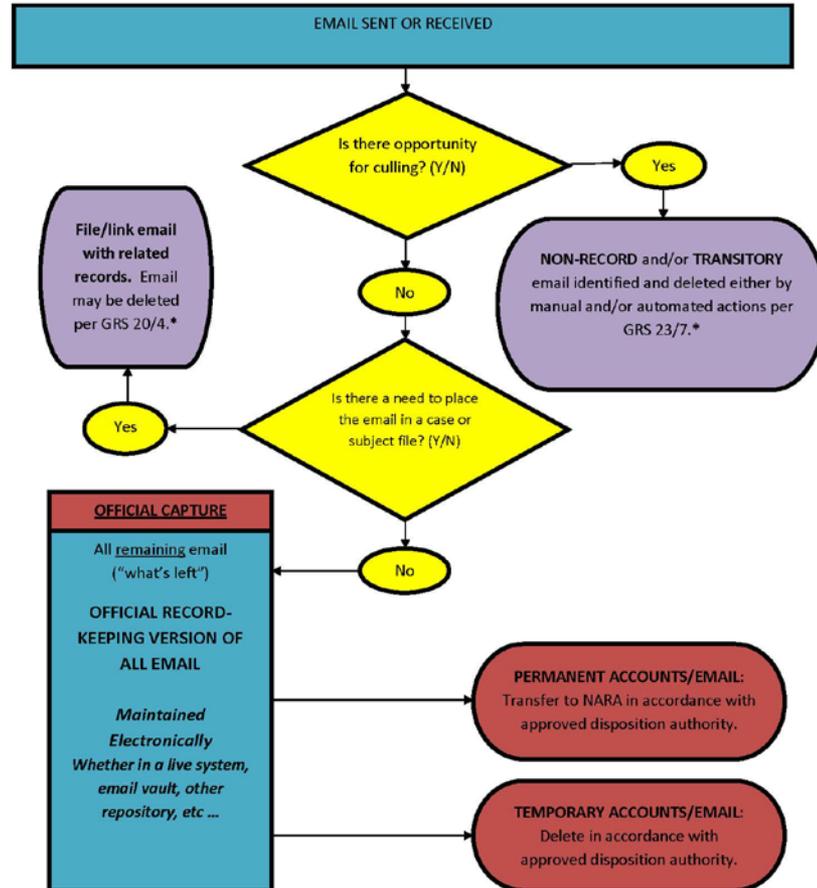
# Section III: Where to Start

- The stakeholders should be informed on the Capstone approach and its offerings, so they can assist with:
  - Current program assessment
  - Discussion of an appropriate implementation approach for your Agency
  - Decisions/designing of the Agency's Capstone approach implementation plan
  - Identifying available technologies/tools/resources



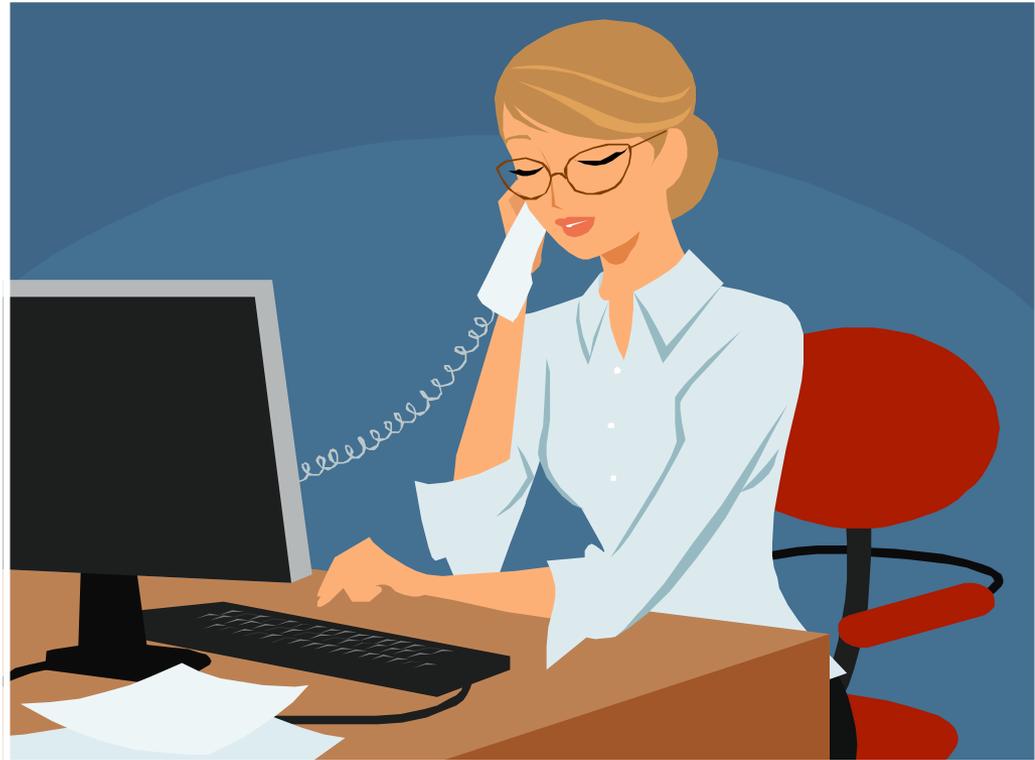
### CAPSTONE APPROACH

Various approaches to email management when planning your agency's Capstone implementation.



\* If no action taken, then email will still be captured as official record within the email repository.

Call your  
lawyer!



## Section IV: Legal Considerations

## Section IV: Legal Considerations

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What will the attorneys be worried about?  
Everything.

# Section IV: Legal Considerations

## What is likely to be their biggest worry?

- Whether the agency designated a sufficient number of Capstone officials to ensure adequate preservation of permanent records.
- How the agency is implementing the Capstone approach for temporary accounts.
- Documenting the decision-making process for implementing Capstone, including designation of Capstone account holders, is the best defense against a charge of arbitrariness.

# Section IV: Legal Considerations

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- Other common legal concerns:
  - What group of records will be deleted that would have otherwise been preserved?
    - ✦ Will that affect agency obligations with regard to:
      - Litigation
      - Regulation
      - Public policy
  - What records will now be available that weren't before?
    - ✦ Does that present a new risk to the agency for:
      - Litigation
      - Access requests
      - Preservation obligations

# Section IV: Legal Considerations

- Key legal implementation questions:
  - How will the agency be able to execute a litigation hold under a Capstone framework?
    - ✦ The answer is dependent upon your agency's technology.
    - ✦ The focus of this question is on temporary records that would have been otherwise destroyed.
  - How will the agency be able to search the records it is now keeping?
    - ✦ And, what about export?
    - ✦ This matters for both e-discovery and FOIA.
  - What is the plan for destroying temporary records and nonrecords?
    - ✦ Defensible deletion.

## Section V: Capstone Approach Scope



# Section V: Capstone Approach Scope

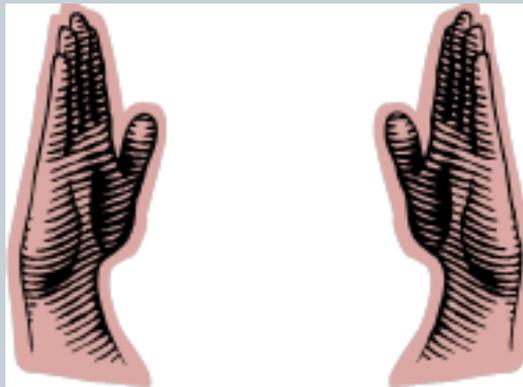
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- Capstone Approach Points Recap:
  - Capstone is a method, a high-level concept; it is not a software package or specific tool.
  - The approach allows email to be managed as a record series.
  - There is no “one size fits all” when it comes to Capstone implementation.
  - Agencies may develop different implementation approaches that work best for their business and legal needs.

# Section V: Capstone Approach Scope

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- The bulletin allows for flexibility, giving Agencies the freedom to:
  - Decide the suitability of implementing a Capstone approach.
  - Design an approach that best fits the needs of the Agency.
  - Determine what scope (level of implementation) is best.



# Section V: Capstone Approach Scope

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- Remember:
  - The goal is to become compliant with M-12-18, section 1.2, managing all emails in an electronic format by December 31, 2016 ... **the broader your Capstone implementation (organizationally), the more likely this is to occur.**
  - If an Agency opts to not use Capstone, they must still meet the requirements of M-12-18, section 1.2.

# Section V: Capstone Approach Scope

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- Scope of your Capstone Approach.
  - **Decision 1**
    - ✦ Approach applies to the entire agency
    - ✦ Approach applies to only specific offices and/or regions
  - **Decision 2**
    - ✦ Approach applies to legacy email accounts
    - ✦ Approach applies to day-forward email accounts
    - ✦ Approach applies to a specific email platform or email archiving solution
    - ✦ Approach applies to legacy, specific email platform or email archiving solution and day-forward email accounts

# Section V: Capstone Approach Scope

- **Ramifications:**
  - Limiting Capstone to day-forward email only: Then an agency must use alternate processes for the management of legacy email.
  - Limiting Capstone to legacy email only: Then an agency must use alternate processes for the management of day-forward email.
  - Limiting Capstone to specific offices or regions: Then multiple email approaches must be maintained and managed.
- **An agency must make scope decisions carefully.**

# Section V: Capstone Approach Scope

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- NARA suggests that you consider the largest scope possible.
  - Approach applies to the entire agency.
  - Approach applies to both legacy and day-forward email accounts.

## Section VI: Implementation Factors

# Section VI: Implementation Factors

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- Implementation Factors include:
  - Technology
  - Policy
  - Training and Awareness
  - Stakeholder Input

# Section VI: Implementation Factors

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## Technology

- Review Current IT capabilities, including email systems, email archives, etc.
- Can the agency:
  - Identify separate accounts by user or office
  - Update account information when staff changes
  - Separate/flag permanent and temporary accounts
  - Dispose of temporary accounts
  - Transfer permanent accounts to NARA
- Consider which system capabilities can be automated and if any must be done manually.

# Section VI: Implementation Factors

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## Policy

- Agencies may need to create and issue policies for their Capstone approach.
  - How much oversight is needed?
  - Will agency allow staff to cull transitory, personal, and/or nonrecords?
  - When will the permanent accounts be captured for preservation?
  - What are current agency policies on personal use of agency email accounts?
  - What are current agency policies on use of personal accounts to conduct agency business?

# Section VI: Implementation Factors

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## Training and Awareness

- The level of training required varies depending on your agency's Capstone approach.
- Users need to be trained on how to implement the agency's Capstone approach.
  - Personal use of email
  - Agency email management policies
- IT and RM may require additional training.



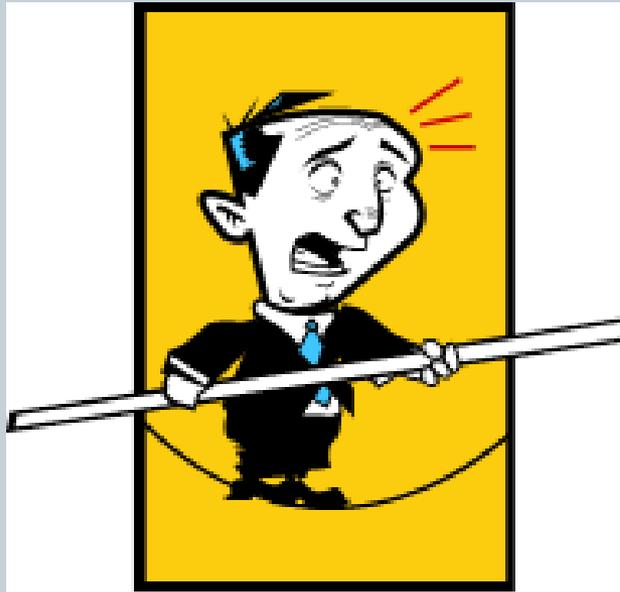
# Section VI: Implementation Factors

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## Stakeholder Input

- Keep all your stakeholders involved throughout planning and implementation.

## Section VII: Specific Records Management Considerations



# Section VII: Specific Records Management Considerations

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- **Cross-filing/Linking of Email:**
  - Using electronic pointers (such as metadata tags) to establish linkages.
  - In select cases, filing with associated paper or electronic case or project files.
- **End-user Roles:**
  - Your agency's Capstone approach could completely remove the user from making records management decisions, or still allow for a level of user involvement that meets the business and legal needs of the agency.
- **Remember ... Capstone allows for flexibility.**

# Section VII: Specific Records Management Considerations

- **Culling:**
  - Culling is any activity, whether automated or manual, that removes nonrecord and/or transitory material from an email account.
  - Culling is encouraged by NARA, especially when automated, to reduce capture of nonrecord and transitory material.
  - Agencies must not remove email that is considered a record, unless it is filed elsewhere. Culling should enhance the accessibility and usefulness of the complete record.

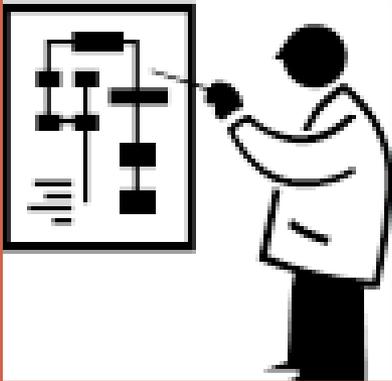
# Section VII: Specific Records Management Considerations

- Culling Options:
  - Automated: activities that do not require end-user action.
    - ✦ De-duplication tools (e.g., automated detection of email blasts)
    - ✦ Nonrecord categorization (e.g., emails from a specific domain, such as a ListServ, are identified as nonrecord)
    - ✦ Other rules that assist with email categorization
  - Manual: activities that do require end-user action.
    - ✦ A period of time (“safe harbor”) allowing users to manually make record/nonrecord categorization decisions before capture.
  - Both Automated and Manual.
  - No Culling.

# Section VII: Specific Records Management Considerations

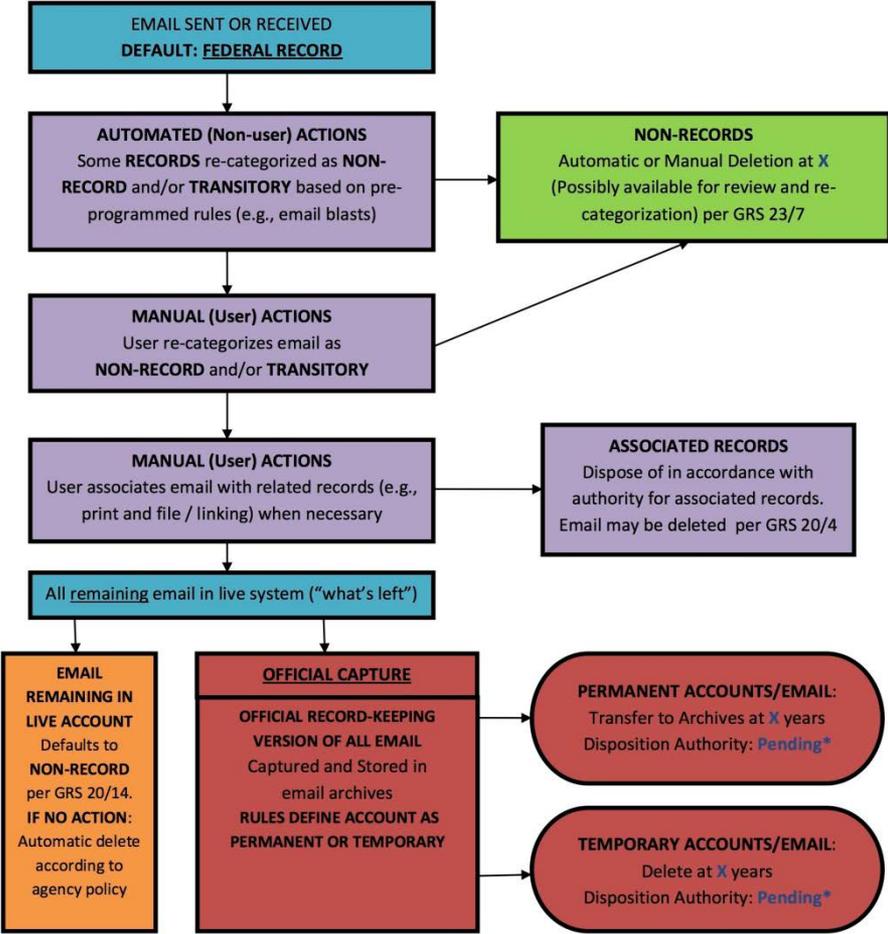
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- Without culling an Agency is accepting:
  - All content, including personal, in email accounts will be treated as record.
  - All content in email accounts designated as permanent will be transferred to NARA.
- Even accepting this, a Capstone approach will likely lead to much better management of email!



### ONE APPROACH TO CAPSTONE

This example assumes the use of an email archive, and allows for both automated and manual culling.



\* A valid disposition authority will be required.

## Section VIII: Designating Accounts



# Section VIII: Designating Accounts

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- Capstone relies on identifying entire accounts as either permanent or temporary.
  - Disposition will be based on account owner's role in the agency.
  - The agency will identify those accounts that will be captured as permanent.
  - There are resources and tools that can assist with this decision-making process.

# Section VIII: Designating Accounts

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## Permanent Accounts

- Senior officials may be the best place to start ...
  - Heads of departments and independent agencies and their deputies and assistants
  - Heads of program offices and staff offices including assistant secretaries, administrators, and commissioners
  - Directors of offices, bureaus, or equivalent
  - Principal regional officials
  - Political appointees, and officers of the Armed Forces serving in equivalent or comparable positions (Flag Officers)
  - Staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants

# Section VIII: Designating Accounts

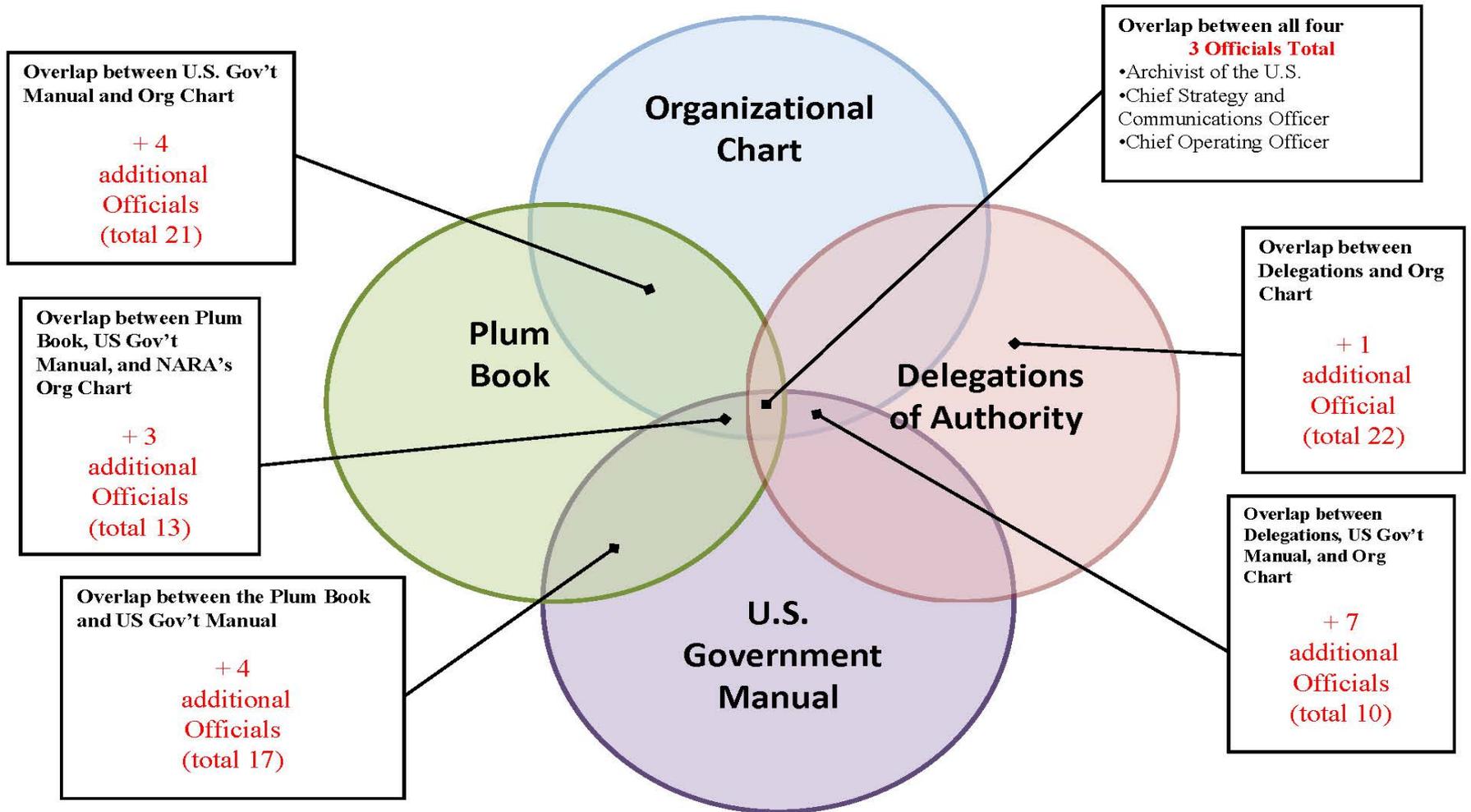
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- Senior officials are identified in
  - The Federal Government Plum Book
  - The US Government Manual
  - An agency's Organizational Chart
  - An agency's Delegations of Authority
  - An agency's Orders of Succession



...or however your agency defines its senior officials.

An analysis of Capstone Officials at NARA, using the U.S. Gov't Manual, Plum Book, NARA organizational chart, and NARA delegation of authorities



# Section VIII: Designating Accounts

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## Permanent Accounts

- Agencies should not stop at “senior” officials when identifying permanent accounts. An agency should look at its lines of business:
  - Accounts from offices that routinely create permanent records
  - Accounts from offices that formulate and/or implement policy
  - Accounts associated to certain programs or initiatives, rather than a person
  - All accounts used by or on behalf of Capstone officials must be included (e.g., alias accounts, classified accounts, etc.)
- Accounts and their use may change over time and should be evaluated on a recurring basis.

# Section VIII: Designating Accounts

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## Temporary Accounts

- Agencies including temporary accounts in their Capstone approach have additional decisions to make.
- To ensure proper decisions are made for temporary accounts, all stakeholders should be involved in the process.

# Section VIII: Designating Accounts

## Temporary Accounts

- One retention length may be appropriate for all remaining email accounts -- the one bucket approach for temporary accounts.
- Multiple retention lengths may be appropriate -- the multiple bucket approach for temporary accounts.
  - For example, one retention length for “middle management” temporary email accounts and one for everyone else’s temporary email accounts.
- An agency should consider its business and legal needs when having these discussions.

# Section VIII: Designating Accounts

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- Scenario, wherein an agency has:
  - Decided to implement a Capstone Approach.
  - Identified their permanent Capstone accounts.
  - Included temporary accounts in their Capstone approach.
  - Identified that temporary email accounts fall into a 3 to 15 year retention band.
  - Considered all concerns of the appropriate stakeholders.
- Therefore, the agency proposes disposition as:
  - Bucket One: all permanent (Capstone) accounts. Transfer to NARA.
  - Bucket Two: all temporary (non-Capstone) accounts. Destroy at 15 years.

# Section IX: Disposition Authority



The screenshot displays the National Archives website interface. At the top, the National Archives logo is on the left, and navigation links for "Blogs", "Bookmark/Share", and "Contact Us" are on the right. A search bar labeled "Search Archives.gov" with a "GO" button is positioned in the top right. Below the logo is a horizontal menu with five items: "Research Our Records", "Veterans Service Records", "Teachers' Resources", "Our Locations", and "Shop Online".

The main content area is titled "Records Managers" and includes a breadcrumb trail: "Home > Records Management > Records Control Schedules". The left sidebar contains a "Records Control Schedules" section with links to "Main Page", "About Records Control Schedules", "Browse Records Control Schedules", and "List All Record Groups". It also features a "GO to RGS" button and a "SEARCH" button. Below these are links for "Newly Approved Schedules", "Newly Updated Schedules", and "SF 115 Numbering Key".

The main content area is titled "Records Control Schedules (RCS)" and contains a descriptive paragraph: "The Records Control Schedule (RCS) repository provides access to scanned versions of records schedules, or Standard Forms 115, Request for Records Disposition Authority, that have been developed by Federal agencies and approved by the Archivist of the United States." Below this is a list of navigation options:

- Browse Records Control Schedules by Agency, Department or Organization
- List All Record Groups
- Go to Record Group:  [GO to RGS](#)
- Search Records Control Schedules:  [SEARCH](#) [Tips](#)

# Section IX: Disposition Authority

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- Records managed under a Capstone approach require a Capstone-specific disposition authority.
  - NARA is considering the viability of a General Records Schedule (GRS) for the Capstone approach.
  - If a GRS is not available or applicable to your agency, NARA will work with you to develop schedules when necessary.

## Section X: Tools & Resources



# Section X: Tools & Resources

- NARA is considering additional tools to assist you, such as:
  - Technical requirements check-list
  - “Lessons learned” presentations from agencies who have implemented Capstone
- Other related resources:
  - NARA’s forthcoming format guidance will include a section about email
  - NARA’s guidelines for pre-accessioning
  - NARA’s Records Management Pages on [Archives.gov](https://www.archives.gov)

# Section XI: Questions and Answers

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