

National Archives and Records Administration

Transmittal Memo

DATE: February 5, 2015

TO: Executives, Staff Directors, NHPRC and OIG

SUBJECT: NARA 861 – Email Records Management

Purpose: This directive implements the “Capstone” approach for managing NARA email records (including email messages and attachments, calendar appointments, and tasks).

Background/significant changes: This policy directly supports Goal 1 of [OMB M-12-18](#), “Managing Government Records Directive,” which requires that, “[b]y December 31, 2016, Federal agencies must manage all email records in an electronic format. Email records must be retained in an appropriate electronic system that supports records management and litigation requirements including the capability to identify, retrieve, and retain the records for as long as they are needed.” This policy also addresses recordkeeping requirements when using personal or non-NARA communications tools to conduct NARA business. For more details on these basic functions, as well as the Capstone approach, consult the [NARA Corporate Records Management Email Management](#) page at [NARA@Work](#).

NARA users continue to have the responsibility to understand that most of the emails they create and receive in the course of their day-to-day work are records, and to use the tools in the email system to weed out non-records (including personal emails) before capture as an official record. Records are defined and explained in [44 U.S.C. 3301](#), and in the Code of Federal Regulations in [36 CFR 1222.10](#).

Email records captured and managed under the Capstone approach will be maintained as unscheduled records until the approval of an appropriate records schedule. Once approved, NARA will implement retention and disposition of email records accordingly.

Canceled policy: Interim Guidance 95-290, Handling Email Documents that are Federal Records, and 804-1, Disposition of E-Copies of Federal Records Created and Maintained by NARA.

Effective date: This policy is effective on the date of signature.

Contact information: Contact Corporate Records Management [CM] within the Office of the Chief Operating Officer.

National Archives and Records Administration

DAVID S. FERRIERO
Archivist of the United States

Attachment

National Archives and Records Administration

NARA 861
February 5, 2015

SUBJECT: NARA Email Records Management

861.1 Purpose.

This directive implements the “Capstone” approach to email records management and identifies its authorities, scope and objectives.

861.2 Policy.

- a. This policy implements OMB M-12-18, Part I, Goal 1.2. NARA (and all Federal agencies) will “manage all email records in an appropriate electronic system that supports records management and litigation requirements (which may include preservation-in-place models), including the capability to identify, retrieve, and retain the records for as long as they are needed.”
- b. This policy implements the guidance in NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records, also known as “Capstone”. NARA’s implementation of Capstone aims to improve NARA email records management by simplifying and automating it in an electronic recordkeeping system.
- c. This policy applies to email records created or received after January 23, 2013. NARA email records are defined as email messages with attachments and include calendar appointments, and tasks managed in the same system as email messages.
- d. Electronic versions of email messages in NARA’s electronic recordkeeping system sent or received on or before January 22, 2013 are convenience copies unless manually categorized under Capstone (see NARA 861.4). Email records dated on or before January 22, 2013 are governed by NARA’s “print and file” policy for managing email records.
- e. This policy **ONLY** applies to NARA email records. All other records, either paper or electronic, are governed by the appropriate NARA Records Schedules or the General Records Schedules. Unscheduled records must be treated as permanent pending a final decision by the Archivist of the United States.

861.3 Roles and Responsibilities.

- a. **The Director, Corporate Records Management (CM):**
 - (1) Designates email accounts as Capstone or non-Capstone.
 - (2) Ensures that Capstone designations are kept current with personnel and organization changes.

- (3) Provides training to NARA staff on Capstone records management implementation.

b. Information Management Officers (IMOs) (See NARA 860.5e):

Monitor personnel changes within their offices and inform CM of changes relevant to Capstone status designations.

c. NARA Personnel (employees, contractors, volunteers, interns and fellows) with NARA email accounts:

- (1) Obtain basic records management training and training on how to use the email system. For training information visit [NARA's email management web page](#)
- (2) Recognize the difference between record and non-record materials and label non-record emails accordingly, to the extent practicable.
- (3) Use the NARA email system for all business purposes. This policy applies to any and all user accounts that the employee uses or monitors.

All NARA account holders are responsible for recognizing that the materials they create or receive while doing NARA business are records. Additional information about records management responsibilities can be found in NARA 860, NARA Corporate Records Management Program.

861.4 Implementation of the NARA “Capstone” Approach.

Under the Capstone approach, NARA manages email records based on the role of the email account user rather than on the content of each email record. Email records are captured and managed according to user role using the following retention approach:

a. Email Records of Designated Capstone Officials.

Email records (email messages and attachments, calendar appointments, and tasks captured by the NARA electronic recordkeeping system) from designated Capstone officials' email accounts will be retained as permanent. These email records will be transferred to the National Archives of the United States according to approved records disposition schedules. NARA Corporate RM maintains the [official list of Capstone officials' email accounts](#).

b. Email Records Captured from Email Accounts Not Designated as Capstone Officials.

Email records (email messages and attachments, calendar appointments, and tasks captured by the NARA electronic recordkeeping system) of all other NARA email

account users will be retained according to the approved records disposition schedule, and destroyed within the electronic recordkeeping system.

861.5 Capstone exceptions.

a. Capstone Permanent:

- (1) **If NARA designates your account as Capstone Permanent (your email records are permanent records),** you may manually designate email records that are non-permanent as Capstone “temporary” (e.g., email messages that should be retained for business purposes but are not of enduring historical value). (For more information on email labeling see [NARA’s email management web page.](#))
- (2) **If NARA does *not* designate your account as Capstone Permanent,** but you send or receive permanent email records, you may manually designate them as “permanent.” If you think a large number of your emails are permanent records, contact Corporate Records Management to determine whether NARA should re-designate your account as Capstone Permanent.

b. **Non-Record Email:** While not mandatory, all NARA staff may designate/label certain email messages as “non-record” so that the recordkeeping system will not capture and manage them. Non-records include: non-business related, personal, “broadcast” messages (e.g., NARA messages to all staff), and advertisements. NARA staff can delete [non-records](#) as well. For more information about how to manage non-records visit [NARA’s email management web page.](#)

c. **Transitory Email Records:** Transitory records are records of short-term (180 days or less) interest which have minimal or no documentary or evidential value. Email records that are transitory may be deleted when no longer needed. Transitory email records needed for longer than 90 days may be labeled as “Non-record” to ensure that they are not captured by the email records management system, per 36 CFR 1236.22(c).

d. **Email records retained with related records:** When business needs require email records to be retained within another recordkeeping system (such as part of a case file), you should also keep a copy of the email with those files. Capstone does not replace existing business practices that require email messages and other related records to be retained together in established recordkeeping systems.

861.6 Email Messages Sent or Received Through Personal or Non-NARA Email Accounts.

NARA staff should use their NARA email accounts for all business-related activities. When circumstances require the use of personal or other non-NARA email accounts to transact NARA business, NARA staff must “carbon-copy” (cc) their NARA accounts to ensure the email record is captured and managed.

861.7 Records of Communications Created Outside of the NARA Email System, such as Telephone, Face-To-Face Conversations, IM/Chat, and Otherwise Undocumented Official Exchanges.

The NARA email records management system may also be used to capture some types of non-email records, such as telephone calls or Google “chat” conversations, that are not automatically captured. For managing these types of records:

- Staff may request the Office of Information Services to convert voice messages into email files.
- Google Chat messages that are records must be saved and then sent to your NARA email account.
- Instant Messages or SMS texts on mobile devices issued by NARA that are records must be saved and sent to your NARA email account.

Personal devices, including laptops and mobile devices, should not be used to store agency records. (See NARA 802.)

861.8 Search and Auditing of System.

System-wide email searches may be conducted by Corporate Records Management with the approval of the General Counsel or Chief Information Officer as part of an internal or external investigation, or in response to an access request as needed. The Corporate Records Management staff will conduct routine audits and analysis of the email system.

861.9 Unauthorized Destruction of Email Records and Reporting Loss.

NARA has data/records backup procedures in place as documented in NARA Directive 804.14d. In the case of unauthorized destruction of email records, users should first contact their supervisor and then the IT Helpdesk to attempt recovery. Should recovery not be possible, the user or office must report the incident to Corporate Records Management. Corporate Records Management will subsequently report the incident to the Chief Records Officer for the U.S. Government. The report should describe the records, the circumstance in which the unauthorized destruction took place, and the corrective steps being taken to properly manage the records in the future.

861.10 Authorities.

- a. 44 U.S.C. Chapters 21, 29, 31, and 33
- b. 36 CFR Chapter XII, Subpart B – Agency Records Management Responsibilities
- c. 36 CFR Chapter XII, Subpart C – Electronic Records Management
- d. OMB M-12-18, Managing Government Records Directive

861.11 Maintaining Records Generated by this Policy.

- a. Records created by Corporate Records Management.
 - (1) Records documenting the planning, managing and evaluating of the program: maintain records under File No. 241-1a.
 - (2) Records documenting the development of records management policy: maintain records under File No. 241-1b.
- b. Records created during program implementation: maintain records under File No. 241-3a, b, or c as appropriate.
- c. Records created by the Office of the Archivist: maintain records under File No. 108.
- d. Records created by executive records management stakeholders related to NARA's own records management policy development and agency-wide implementation: maintain records under File No. 109 as appropriate.