Informational Session: Capstone, A New Approach to Managing Email Records

February 4, 2014
Today’s Agenda

• Opening Remarks
• Brief Overview of the Capstone Approach
• Session 1: NARA’s Capstone Email Management Implementation: Policy Perspective

-15 Minute Break-

• Session 2: Capstone and Email Management Q&A
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.”
Capstone: A New Approach to Managing Email Records

Capstone Concept:

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

Capstone accounts of Department AB

- Lower level accounts that may include a high volume of permanent records may be included in “capstone.”
- High level accounts that may not include permanent records may be excluded from “capstone.”
- Department employees with temporary accounts
- Agency A
- Agency B
- Capstone Accounts of sub-agency senior officials.

The majority of accounts may be scheduled as temporary.
NARA’s Capstone
Email Management Implementation: Policy Perspective

Susan J. Sullivan, CRM
Director – Corporate Records Management

February 4, 2014
NARA’s Internal RM Program

NARA’s Corporate Records Management Staff is organized under the Chief Operating Officer and is responsible for the internal NARA records management program.
Past Policy – Print and File

- NARA’s official policy for email management was print-and-file
- Each end-user was responsible for email management
- Staff managed individual email messages using existing disposition authorities, based on content.
Conducted an Internal Study

- Senior Executive’s email can be categorized as permanent
- Search rules can assist in identifying email for both deletion and retention
- NARA can capture email records by role with minimal or no user input.
Developed Requirements (What we needed)

• Immutable email management solution
• Integrated with the messaging system according to federal requirements to manage the content of the email system as electronic records, including but not limited to:
  • messages,
  • attachments, and
  • associated metadata
• Must maintain functionality and integrity throughout the records’ full lifecycle.
Developed Requirements (How to implement)

• ....automated capture in an open format of all email messages EXCEPT:
  – (1) where automated "rules" exclude some objects from capture
  – (2) where manual actions over-ride the automated "rules" in place

• ....an automated rules-based approach to records management.
  – ability to establish records categorization rules
  – automatically categorize records for management, disposition, transfer.
NARA developed a team of internal stakeholders to lead a Capstone approach to meet NARA’s business needs:

• Corporate Records Management
• Office of General Counsel
• Chief Information Officer staff
• Office of Chief Records Officer (Paul Wester’s group)
• Members of Senior Leadership (monitoring / supporting).
Defined Capstone Accounts

- 48 staff members were identified as “Capstone”
  - Agency Head & Deputy
  - “C” Level Officials
  - Executives
  - Directors of major programs
  - Presidential Library Directors
Determined Capture Methodology

Journaling
• Captures all sent and received
• For e-Discovery and RM quality monitoring

Mailbox Crawling
• For records management
• Rules based
• Acts on labels, if applied
• Excludes “non-record”, deleted, draft, spam
• Supports “Safe Harbor”
• Requires extra security (IMAP)

AND
Decided Scope

• Email messages and attachments
• Calendars and appointments
• Tasks (that are part of a calendar)
• Chat transcripts (that are moved to a mailbox)
• January 22, 2013 is the designated effective date
  – Objects created or received after January 21, 2013 are captured and automatically categorized as permanent or temporary records under Capstone, by default.
Determined Policy for Legacy Content

• If sent or received before effective date (January 22, 2013)....
  – NARA’s print and file policy still applies (electronic = convenience copies)
  – Or, users may manually categorize these items as temporary, permanent, or non-records within RMA as needed.
Adopted “Safe Harbor”

**Gmail Safe Harbor** – Time period before recordkeeping capture to:
- Delete useless non-records
- Label non-record information that users want to keep
- Label records as Temporary or Permanent when the default Capstone retention category, based on user’s role, is inappropriate

**RMA Safe Harbor** – After capture, time period to review captured records in the RMA and change the default category (e.g., from temporary to non-record).
Reviewed Capture Logic

- **90 days old?**
  - Yes → **Non-record?**
  - No → **Spam, draft or trash?**

- **Non-record?**
  - Yes → **Do Not Capture**
  - No → No

- **Spam, draft or trash?**
  - Yes → **Capture**
  - No → No
Developed Records Declaration Policy

• Is the account designated as Senior Official?
  – Yes. Declare / file as permanent
    • if not labeled as “temporary”.
  – No. Declare / file as temporary
    • if not labeled as “permanent”.
Specified the “File Plan” in RMA

• Permanent
  – Default for Sr. Officials
  – Labeled as “Permanent” by those not identified as Sr. Officials
  – Re-categorized as Permanent during RMA Safe Harbor
  – Manually categorizing pre-January 22 messages under Capstone

• Temporary
  – Default for everyone else (not Sr. Officials)
  – If labeled as “Temporary” by Sr. Officials
  – For re-categorizing as Temporary (e.g., by Sr. Officials) during RMA Safe Harbor
  – Manually categorizing pre-January 22 messages under Capstone

• Non-Record
  – For re-categorizing during RMA Safe Harbor (i.e., from Permanent or Temporary)
Communicated, communicated, communicated

Briefings, blogs, Intranet, and emails!
Addressed Nuances

• Capstone may work well for daily communications that are not necessarily part of a business process.....BUT

• When business practices require email to be retained as part of a case file or other recordkeeping system....

• ....staff should manage these records outside of the archive and retain them according to the applicable records disposition schedule.
Migrated Data from Former RMA

• Pre-accessioned permanent records from legacy RMA first.
  – 25,269 emails
  – 89,577 files
  – 3.17 GB

• Created a “data dump” and complimentary HTML export (for validation purposes) to transfer records and metadata to new RMA

• Migrated data from old RMA to new RMA.
  – Over 250,000 email messages and files
Drafted and Submitted Capstone Schedule

Permanent

• Cut off at end of FY

• Transfer electronic records to the National Archives for pre-accessioning immediately after cut-off

• Transfer to the National Archives 15 year(s) after cutoff.
Temporarily

- From email accounts not designated as Capstone Officials
- These records are created digitally and will not be managed in any other format
- Destroy no earlier than 7 years after capture in the electronic recordkeeping system.
Drafted Internal Capstone Directive

• Explained the NARA “Capstone” approach
• Managing email Records of designated capstone officials
• Managing records captured from email accounts not designated as Capstone officials
• Capstone exceptions
  – Labeling as temporary or permanent (during Safe Harbor)
  – Non-Records
  – Email records retained with related records
• Other considerations for email records
• Maintaining records generated by this policy
Created and Filled ERM Specialist Position

• Serves as the ERM subject matter expert for administering agency electronic recordkeeping system
• Contributes to NARA Corporate Information Management governance, strategy, and training initiatives
• Develops, coordinates, and maintains records schedules for NARA records maintained in electronic information systems
• Coordinates with records management stakeholders to assist in identifying electronic records management requirements and directly implements these requirements, as applicable, in electronic recordkeeping system(s).
Summary

• NARA’s CRO issued the Capstone Bulletin to allow a new approach to email management.
• NARA adopted a new email system (Google Mail)
• Detailed results from earlier internal studies informed requirements
• NARA implemented a Capstone approach to managing email.
• A step forward in meeting the requirements of OMB M-12-18.
Summary

• Ultimately, NARA subscribes to a new cloud email system (Gmail)
• Uses ZL Unified Archive (ZL UA) as the official recordkeeping repository for all agency email records
• Captures and manages email electronically in compliance with Section 1.2 of the Presidential Directive
• Manages records prior to the ZL UA start date under previous policies.
Moving Forward

• NARA submitted a Capstone records disposition schedule
• Approval of this schedule is pending, but proposes:
  – Permanent accounts (currently 48 positions): eventual legal transfer to NARA’s archival holdings.
  – Temporary accounts (all others): minimum of 7 year retention for all email after capture in RMA.
Lessons Learned

- Explicitly include migration of existing email repositories in contracts / plans;
- Establish common understanding with vendors / contractors;
- Recognize that user communication is very important;
- Allow users extra time to manage legacy email;
- Establish Capstone records schedule and policies;
- Communicate, communicate, communicate;
- Collaborate, collaborate, collaborate
Please hold your questions for the panel.

• Thank you!

• Susan Sullivan, CRM
  Corporate Records Management Director
  susan.sullivan@nara.gov
  Tel: 301-837-2088
Capstone and Email Management:

Q&A Panel Session