



Email Management: Capstone

November 17, 2016

Agenda

- Summary of NARA Guidance
- Development of an Agency's Capstone Approach / Policy
- NSA / CSS Email Management and Capstone
- Form NA-1005 Review and Approval Process
- Q & A Panel of NARA staff



NARA Guidance

Managing Government Records Directive

M-12-18

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES AND INDEPENDENT AGENCIES

- 1.2 *By 2016, Federal agencies will manage both permanent and temporary email records in an accessible electronic format*

By 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 (which may include preservation-in-place models), including the capability to identify, retrieve, and retain the records for as long as they are needed. Beginning one year after issuance of this Directive, each agency must report annually to OMB and NARA the status of its progress toward this goal.



NARA Guidance

NARA Bulletin 2013-02 – Guidance on a New Approach to Managing Email Records (Capstone)

Bulletin 2013-02

August 29, 2013

TO: Heads of Federal Agencies

SUBJECT: Guidance on a New Approach to Managing Email Records

EXPIRATION DATE: Expires when revoked or superseded

1. What is the purpose of this Bulletin?

This Bulletin provides agencies with a new records management approach, known as “Capstone,” for managing their Federal record emails electronically. This Bulletin discusses the considerations that agencies should review if they choose to implement the Capstone approach to manage their email records.

NARA developed the Capstone approach as part of NARA’s continuing efforts to evaluate how agencies have used various email repositories to manage email records (see [NARA Bulletin 2011-03, “Guidance Concerning the use of E-mail Archiving Applications to Store E-mail,”](#)). This approach was developed in recognition of the difficulty in practicing traditional records management on the overwhelming volume of email that Federal agencies produce. Capstone will provide agencies with feasible solutions to email records management challenges, especially as they consider cloud-based solutions. Moreover, the Capstone approach supports the [Presidential Memorandum on Managing Government Records](#) and allows agencies to comply with the requirement in [OMB/NARA M-12-18 Managing Government Records Directive](#) to “manage both permanent *and* temporary email records in an accessible electronic format” by December 31, 2016.



NARA Guidance

GRS 6.1: Email Managed under a Capstone Approach

Transmittal No. 25
September 2015 (updated 03/2016)

General Records Schedule 6.1

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 1005 \(NA-1005\), 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.



NARA Guidance

Form NA-1005

FOR NARA USE ONLY	
Number	<input type="text"/>
Received Date	<input type="text"/>
Total Accounts	<input type="text"/>

Agencies are reminded that NARA reserves the right to review agency email practices and records. Pursuant to 36 CFR 1239.20, NARA may undertake an inspection involving high risk to significant records. Problems may be identified through a risk assessment or through other means, such as reports in the media, Congressional inquiries, allegations of unauthorized destruction, reports issued by the GAO or an agency's Inspector General, or observations by NARA staff members.

VERIFICATION FOR IMPLEMENTING GRS 6.1: EMAIL MANAGED UNDER A CAPSTONE APPROACH

SECTION A: Agency and Scope Information



NARA Guidance

Other NARA Resources, www.archives.gov

E-mail Management

Federal agencies are required to manage their email records in accordance with the [Federal Records Act](#) and [36 CFR Chapter XII Sub-chapter B](#).

With the issuance of the [Managing Government Records Directive \(M-12-18\)](#), Goal 1.2, agencies are required to manage both permanent and temporary email records in an accessible electronic format by December 31, 2016. The issuance of [NARA Bulletin 2013-2](#) established “the Capstone Approach” as an alternative means of managing email, while the transmittal of [GRS 6.1](#) provides disposition authority for the approach. Both issuances provide one way in which Federal agencies can meet the requirements of Goal 1.2 of M-12-18.

The following sections are available to provide Federal agencies with additional information on email management and the Capstone Approach:


- [Email Specific Guidance and Resources](#)
- [Capstone Training and Resources](#)
- [Sample Agency Implementation of Capstone](#)
- [How Federal Agencies are Managing Email](#)



NARA Guidance

Other NARA Resources, www.archives.gov

Email Specific Guidance and Resources

- [Success Criteria for Managing Email Records in Compliance with the Managing Government Records Directive \(M-12-18\)](#) 
- [NARA Bulletin 2014-06: Guidance on Managing Email](#)
- [OMB Memo M-14-16: Guidance on Managing Email](#)
- [NARA Bulletin 2013-03: Bulletin Related to Use of Personal Email Accounts](#)
- [NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records \(Capstone\)](#)
- [NARA Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records](#)
- [FAQs About Transferring Electronic Records to NARA](#)
- [Toolkit for Managing Electronic Records](#)

NARA Guidance

- Relatively High level – sets the baseline requirements
- There is no “one size fits all” policy, and NARA will not develop the detailed policy for you
- The real challenge for agencies is using this guidance to **develop detailed policy that works best for their business processes and associated risks!**

For Capstone to work, an agency needs to focus on their own agency-specific policy

Agency Policy Development

- Who helps develop this policy? **Your stakeholders!**
 - Agency Records Officer
 - Senior Agency Official for Records Management
 - General Counsel
 - Chief Information / Technology Officer
 - FOIA
 - Departmental Records Officer, if applicable
 - Others ...

Agency Policy Development

- What may drive / inform this policy?
 - Your agency's business needs
 - Your agency's risk factors
 - Completion of the form NA-1005
 - Technological capabilities / limitations
 - Other policies already in place

Agency Policy Development

- Questions your policy should address
 - How long will temporary accounts be maintained?
 - When will email be cut off?
 - How long before permanent email is transferred to NARA?
 - Format(s) used for management / storage
 - Encryption
 - Relationship to other policies
 - End-user knowledge
 - Capstone “list” management
 - Capture point
 - Journaling, archiving, storage, etc

Agency Policy Development

- Questions your policy should address
 - What level of culling will be allowed, when, and by whom?
 - Automation vs. human interaction
 - Limitations of your agency's technology
 - End-user roles and responsibilities

NSA / CSS

- Involved their agency stakeholders
- Developed internal, specific policy
- Studied GRS 6.1, and identified the proper positions for item 010, permanent accounts
- Worked closely with NARA



Keys to Success



- (U) Identify Key Stake Holders
 - Senior Agency Official
 - Information Technology
 - Finance Offices
 - General Counsel
- (U) Identify Champions
 - Offices, outside of records management, that will benefit from Capstone, GRS 6.1
 - Get your Champions onboard



Keys to Success



- Followed the 10 categories outlined in GRS 6.1 closely
 - Included NARA from early on in the development process
 - Built upon existing electronic records management program
- Challenges
 - Implementing automatic capture of email
 - Workforce awareness



NSA GRS 6.1



- NSA approved to use GRS 6.1 for managing email
 - 132 permanent positions identified based on new NSA21 organizational structure
 - Includes both NSA headquarters and field positions
 - All other emails will be retained for 7 years
 - Emails of permanent positions currently captured at change of position/retirement



Next Steps



- Workforce awareness campaign
- Automation
 - Implementation of automatic capture of email
 - Culling
 - Management of Capstone position list



Capstone, GRS 6.1 & NA-1005

November 17, 2016



NA-1005 Approval Process

- Form NA-1005 submitted by agency to the NARA GRS Team
- NARA GRS Team does administrative review
 - All required fields are complete
 - Completed fields meet the requirements
 - Verification of Record Group (RG) and signatures
- NARA GRS Team review will lead to:
 - Return of form to the agency, or
 - Request for GRS Team to make minor changes, or
 - Registration, and forwarding to the Appraisal Archivist

NA-1005 Approval Process

- Appraisal Archivist Review
 - Review Section A of the form; with special focus on:
 - Cutoff instructions
 - Transfer Instructions
 - Additional Scope Comments
 - Legacy Email Comments
 - Prepare to review Section B of the form
 - Organization Charts
 - PLUM Book / Yellow Book
 - Government Manual

NA-1005 Approval Process

- Appraisal Archivist Review
 - Review Section B of the form; with special focus on:
 - Category-by-category review using the organizational tools
 - Does the submission align with the requirements of the category definition?
 - Appraisal Archivist uses a “worksheet” to document any potential issues, questions, omissions, etc.
 - Appraisal Archivist MAY reach out to the agency for clarification

NA-1005 Approval Process

- Appraisal Archivist Review
 - Stakeholder review
 - Similar to a records schedule, submission is reviewed by various stakeholders within NARA
 - Electronic Records Custodial Unit
 - National Declassification Center
 - Textual Records Custodial Unit
 - Stakeholders may make comments back to Appraisal Archivist
 - Their knowledge of agency records, and the organization of the agency
 - Stakeholders ultimately return their own worksheets, with comments, back to the Appraisal Archivist
 - Submission **MAY** be reviewed by the larger “Capstone GRS Development Team” within NARA (brings in General Counsel, supervisors, etc.)

NA-1005 Approval Process

- Appraisal Archivist Review
 - Revisions
 - Appraisal Archivist may return the submission back to the agency for revisions
 - Removal of positions that do NOT meet the definitions within the categories
 - Addition of positions that DO meet the definitions within the categories, but were omitted
 - Moving of positions from one category to another
 - Revisions to scope comments (generally clarification, or expansion of the comments)
 - Dialogue between the Appraisal Archivist and the agency is key!
 - May request clarification on why positions are included, or were omitted
 - May request additional information, including position descriptions



NA-1005 Approval Process

- Approval
 - Agency re-submits the form with any revisions (if required)
 - Form is routed through NARA for approval
 - Appraisal Archivist
 - Supervisor
 - Director, Records Appraisal and Agency Assistance
 - Chief Records Officer for the United States Government (formal approver)
 - Agency is notified of approval, and a signed form is sent to them
 - Data is uploaded to the GitHub site

NA-1005 Approval Process: NSA

- Communication and Partnership with NARA!
 - NARA Appraisal Archivist met with NSA on their campus to review draft forms, and go over questions
 - Open dialogue for months, as NSA worked the form internally
 - NARA Appraisal Archivist and members of NARA senior leadership reviewed drafts, and the final submission
 - NSA provided NARA with additional information as requested
 - NSA assisted in walking NARA through organization charts and other material
 - Challenge: classified nature of the discussions and some material being classified

Steps for YOUR agency may be different

NA-1005 Common Issues

- Administrative (primarily Section A):
 - Not using the most up-to-date version of the NA-1005
 - Not submitting one form per Record Group (RG)
 - Use of acronyms in agency title
 - Use of intranet URL for organization chart – this must be public

NA-1005 Common Issues

- Administrative (primarily Section A):
 - Missing the field for whether or nor the agency has classified email
 - Incomplete or missing fields: cutoff, transfer, additional scope, legacy scope
 - Contradictory fields (for example, stating it is not agency wide but not explaining in the additional scope field)
 - Missing signatures and/or dates



NA-1005 Common Issues

- Legacy Scope:
 - Legacy email **MUST** be included when using GRS 6.1
 - “Agency will not be including legacy email” --- NO
 - “Agency will be including legacy email” --- NO (INCOMPLETE)
 - “Agency operated under a print-and-file policy prior to the implementation of Capstone. The agency does, however, have legacy email for some positions dating back to approximately 2010.” --- YES
 - “Agency operated under a print-and-file policy prior to the implementation of Capstone. The agency is researching the extent to which legacy email exists, and will report back to NARA.” --- YES
 - “Agency operated under a print-and-file policy prior to the implementation of Capstone, and no legacy email exists.” --- YES

NA-1005 Common Issues

- Position Categories (Section B):
 - Missing positions
 - Some are more clear than others (Chief Operating Officer, Chief Financial Officer, General Counsel, etc.)
 - Use of “wrong” category
 - Generally, if a position falls into more than one category, put them in the HIGHER category
 - Inclusion of positions that do not fit any categories
 - Appraisal Archivist may reach out to discuss the rationale here, and to determine whether said positions should be removed

Goal: Consistency across government



NA-1005 Common Issues

- Position Categories (Section B):
 - Aggregation (rolling up of positions) does not always work
 - Works well with higher categories, when ALL positions of a certain tier are being included
 - Category 2: Example: “All Under-Secretaries / 24 Accounts” --- YES
 - Category 3: Example: “All Executive Assistants / 10 Accounts” --- NO
 - For category to work, we need to know to whom they are the assistant
 - Category 6: Example: “Various Program Directors / 38 Accounts” --- NO
 - Need to distinguish which program directors are included, especially when not all of them are
 - Position count versus Account count
 - Example: “All Under-Secretaries (24 positions)” “48 accounts”

Goal: Consistency across government



Don't Panic!

- Appraisal Archivist will work with you
- Open dialogue is encouraged
- Changes can be made along the way
- Re-submission process(es) will allow us to “fix” any hiccups
- We at NARA are new at this too!

Goal: Consistency across government