

Frequently Asked Questions (FAQs) about GRS 6.1, Email and Other Electronic Messages Managed under a Capstone Approach

February 2025

These FAQs provide additional information for agencies implementing GRS 6.1, *Email and Other Electronic Messages Managed under a Capstone Approach*.

Agencies adopting a Capstone approach should also consult [other resources available from NARA](#). These relate to email and electronic messages management, electronic records management, and the Capstone approach. Agencies should supplement use of GRS 6.1 with agency-wide policies and training. Agencies should also incorporate the schedule's requirements into agency records management implementation tools (such as manuals and file plans). See [Section 5: Questions about Implementation](#) for more information.

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Section 1: General Questions about GRS 6.1

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1. What is the purpose of GRS 6.1?

This schedule:

- Provides disposition authority for email records managed by those agencies who wish to adopt a role-based (Capstone) approach. This is outlined in [NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records \[Capstone\]](#).
- Provides disposition authority for certain other types of electronic messages, for those agencies who wish to expand their role-based approach beyond just email. This is outlined in [NARA Bulletin 2023-02: Expanding the use of Role-Based \(Capstone\) Records Management Approach](#).

2. Who should I contact for more information about this schedule?

You may contact NARA's General Records Schedules Team at GRS_Team@nara.gov with questions about this schedule.

3. How does an agency document that it is using the Capstone GRS?

To ensure proper oversight and accountability, agencies wishing to use this GRS must first get approval of the form [NA-1005, Verification for Implementing GRS 6.1](#) from NARA. This form will document:

- Whether or not the agency wishes to also apply this GRS to other types of electronic messages, as defined by the GRS scope;
- Which items from the GRS the agency wishes to use;
- General implementation scope and background information, such as cutoff and transfer instructions for permanent records; and
- Those roles and positions that fit the 10 categories defined in item 010, Email and Other Electronic Messages of Capstone Officials.

Instructions for filling out and submitting the form are available on the form NA-1005 itself. Please also see [Section 10: Questions about Completing the form NA-1005](#) for additional information.

4. Do all agencies have to follow this GRS?

No. Agencies are not required to use this GRS. However, if an agency chooses to use one or more items in this GRS, it must submit a form NA-1005 and may not deviate from the schedule's scope. If an agency wants to deviate from the GRS, then the

agency may request authority to implement a Capstone approach that differs from this GRS by submitting an agency-specific records schedule to NARA.

Reasons agencies may wish to submit an agency-specific schedule can include, but are not limited to:

- The agency can justify that it is appropriate to exclude one or more of the officials required for inclusion in item 010, Email and Other Electronic Messages of Capstone Officials;
- The agency can justify a transfer date longer than the maximum in item 010;
- The agency can justify a shorter retention for records covered by items 011 and/or 012;
- The agency wishes to apply the Capstone approach to other types of electronic messages specifically excluded from this GRS; and/or
- The agency generally wants to propose a scope that differs from that of this GRS.

We encourage agencies to discuss scheduling options with their [NARA Appraisal Archivist](#).

5. May an agency implement portions of this GRS?

Yes. An agency has important scope and implementation decisions to make when deciding to use this GRS, and must document these on the form NA-1005 for NARA review and approval.

First, an agency must determine if they are applying the GRS only to email records, or also to the other types of electronic messages included in the scope of the GRS. This is documented in the “GRS Implementation Scope” field of the form NA-1005. If an agency is not using the GRS for other types of electronic messages, they should select “no (email only)” for this field. Those agencies that select “yes” are required to complete the “Electronic Messages” tab on the form NA-1005. Please also see [Section 10: Questions about Completing the form NA-1005](#).

Secondly, an agency must determine which of the three items from the GRS they are using. An agency may use any or all of the items on this GRS. If applying this GRS in part (for example, only using item 010), agencies must ensure that all other records are covered by other NARA- approved disposition authorities. Agencies that are using only item 011 and / or 012 may not dispose of the records of any official listed in item 010, Email and Other Types of Electronic Messages of Capstone Officials, without authority from NARA in the form of another GRS or an agency-specific schedule. An agency must still submit form NA-1005 for approval in order to use either only the permanent item or only the temporary items of this GRS.

This flexibility supports those agencies that may want to implement Capstone in phases. Some agencies may find it practical to initially limit their overall Capstone approach to permanent email (item 010) and add management of temporary email and other types of electronic messages within their overall Capstone approach later.

6. What does this GRS mean when using the term “official”?

In context of this GRS, the term “official” includes all federal agency employees, regardless of their appointment type (such as part-time employees, student employees, term employees, temporary employees, volunteers, interns, and members of the military), who create federal records.

Officials under this GRS also include contractors that create federal records in the course of performing their contract. Agencies determine whether contractor-created and -received records meet the definition of a federal record defined in the Federal Records Act. Agencies must capture and manage contractor-created or -received federal records appropriately, as with other federal records. In situations where contractor employees are embedded in the agency and assigned agency email accounts (in contrast to situations where contractors fulfill the terms of a contract by providing a service from outside of the agency), the agency should manage those accounts in accordance with the GRS. Agencies should include records management requirements and provisions on retaining federal records in contract agreements (36 CFR 1222.32).

7. Which officials are designated as Capstone (permanent) Officials by this GRS?

Your agency must document its Capstone officials and submit that information to NARA on the form NA-1005. This form includes detailed instructions to help you identify your agency’s officials.

Capstone officials are usually senior officials (such as those high on the organization chart) generally responsible for policy- and mission-related actions. Capstone officials vary agency by agency depending on an agency’s organization and how it carries out agency roles. Some agencies will have more Capstone officials than others.

Federal agencies utilize a variety of titles for Capstone officials. Agencies using item 010 of this schedule must *identify their equivalents* for those positions described within each category provided in the item’s description (when applicable).

Cabinet-level agencies implementing a Capstone approach that includes their components or operatives must apply the definition of official to each component separately. For this purpose, the agency should treat each component or operative as though it were a separate agency.

A general rule of thumb for identifying officials is that every record group (RG) the agency includes in the Capstone implementation should have its own group of Capstone officials.

If you need additional help to identify your agency's Capstone officials, please also see [Section 10: Questions about Completing the form NA-1005](#). You may also contact your [NARA Appraisal Archivist](#) or the GRS_Team@nara.gov for advice.

Section 2: Questions about “Certain other types of Electronic Messages”

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1. Why is NARA incrementally expanding Capstone, and excluding some types of electronic messages from this GRS?

The universe of electronic messages is very broad. By limiting the scope of electronic messages covered by the GRS, it allows for the incremental expansion of the Capstone approach as NARA gains a better understanding of how agencies use messaging applications.

NARA determined that electronic messages that are typically affiliated with other records – and rely on those other records to understand context – should be excluded. For example:

- Chat messages affiliated with collaboration platforms lose their value when separated from other records on the collaboration platform, such as a project file;
- Chat messages affiliated with a video conferencing service lose their value when separated from the related records, such as the video recording itself.

Not having these exclusions would result in agencies having to capture, as a permanent record, any chat in collaboration platforms or video conferences in which even one Capstone official participates.

NOTE: Agencies are reminded that those electronic messages excluded from GRS 6.1 may still be federal records, and still require disposition authority. Please consult [NARA Bulletin 2023-002, Expanding the Use of a Role-Based Approach \(Capstone\) for Electronic Messages](#) or contact your NARA Appraisal Archivist for additional information and guidance

2. What are examples of the certain other types of electronic messages included and excluded in the scope of “electronic messages”?

Below is a non-exhaustive list of examples of applications and platforms that create the types of records that are included and excluded in the scope section of the GRS:

Included in Scope: generally, the GRS 6.1 includes electronic messages that do not lose context when separated from other records.

Scope	Examples
Messages affiliated with email system chat or messaging functions, and where the messages are managed independently from the email	<p>Google Chat, Microsoft Teams Chat (excluding channels), etc.</p> <p>NOTE: may include electronic messages created inside a meeting that cannot be segregated from other messages that are included here, such as chat associated with Microsoft Teams meetings.</p>
Messages from messaging services provided on mobile devices	Messages on IOS or Android devices, etc. This category generally includes any stand-alone text feature on mobile devices that usually don't require additional download.
Messages from messaging services on third-party applications	WhatsApp, Signal, Telegram, WeChat, SnapChat, etc.

<p>Excluded from Scope: generally, GRS 6.1 excludes any messages that would lose context when separated from other records within a larger collaboration platform or environment.</p>	
Exclusions	Examples
Messages affiliated with social media accounts / social media direct messaging services	Facebook (including Facebook Messenger), X (formerly Twitter), Truth Social, Bluesky, Threads, Instagram, TikTok, YouTube, etc.

Messages affiliated with messaging services provided on video conferencing applications and services	Zoom, YouTube, Skype, Google Meet / Hangouts, GoToMeeting, Microsoft Teams meetings, Cisco WebEx, etc.
Messages affiliated with collaboration platforms	SharePoint, Microsoft Teams channel messages, etc.
Messages affiliated with applications whose primary purpose is not communication	Finance management system that contains a messaging feature

NOTE: Agencies are reminded that those electronic messages excluded from GRS 6.1 *may still be federal records, and still require disposition authority*. Please consult [NARA Bulletin 2023-002, Expanding the Use of a Role-Based Approach \(Capstone\) for Electronic Messages](#) or contact your NARA Appraisal Archivist for additional information and guidance.

3. If an agency is using this GRS for electronic messages, may it only apply the GRS to certain records listed in the inclusions section of the scope?

No. Agencies using GRS 6.1 for the other types of electronic messages included in the scope **must** apply it to all those types if they are being created, as well as to all ten categories included within the scope of the GRS. For example, if an agency has chat associated with email as well as text messages on personal devices, they cannot choose to apply the GRS only to the chat messages and not to the text messages. They must apply the GRS to all forms of other electronic messages they have that are covered by the GRS.

This will simplify implementation, by treating all records used for similar purposes the same in terms of disposition authority and will achieve consistency in how records are managed within federal agencies.

4. If an agency is not creating all of the types of electronic messages listed as inclusions within the GRS scope can it still use GRS 6.1?

Yes. In these instances, an agency should still select “Yes” within the “GRS Implementation Scope” field on the form NA-1005 even if they don’t create all of the electronic message types included in the scope of the GRS.

Those agencies that selected “yes” are then required to complete the “Electronic Messages” tab within Part B of the form. See the form for instructions on completing this section.

5. Are the other types of electronic messages all just transitory?

No. Agencies should consult the [FAQ about Transitory Records in Electronic Messages](#) before determining if any records are transitory.

6. What if my agency automatically forwards all electronic messages into each individual users’ email account?

In these instances, the messages should be managed as email records. This would also be the case for any message types, including voicemail, that are otherwise excluded from the scope of this GRS.

Section 3: Questions related to Permanent Email and other types of Electronic Messages

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1. What is meant by "Cutoff and transfer in accordance with the agency's approved form NA-1005, Verification for Implementing GRS 6.1. This will be between 15 and 30 years, or after declassification review (when applicable), whichever is later." within the disposition instructions for item 010?

Agencies have varying business needs and will adopt unique Capstone implementation plans that may affect when they cutoff (consider the records inactive) email and/or other types of electronic messages. This language allows an agency to define both their cutoff and transfer instructions on the form NA-1005 by selecting the option that meets their business needs.

Cutoff instruction options on the form NA-1005 include:

- Cutoff at the end of the calendar year;
- Cutoff at the end of the fiscal year;
- Cutoff at the end of employee tenure;
- Cutoff at the end of the current administration; or
- Other (discuss with your NARA Appraisal Archivist during review)

Transfer instruction options on the form NA-1005 include:

- Transfer 15 years after cutoff, or after declassification review, whichever is later;
- Transfer 20 years after cutoff, or after declassification review, whichever is later;
- Transfer 25 years after cutoff, or after declassification review, whichever is later;
- Transfer 30 years after cutoff, or after declassification review, whichever is later;
- or
- The above options, but with 5-year blocking.

This flexibility also allows agencies to block (or batch) the records to reduce the number of transfers to NARA. Agencies that do not wish to transfer annually may find blocking beneficial; specifically, an agency could transfer records in five-year blocks instead. If the first five-year block spans from 2015 through 2020, and the agency was transferring permanent email 15 years after cutoff, then the agency would transfer the email in 2036 (15 years after the cutoff date of the most recent records). They would next transfer email in 2041, which would cover email from 2021 through 2025. And so on.

The transfer date should be determined in conjunction with the cutoff instructions, as the two complete the full transfer instructions. Examples of full instructions include, but are not limited to:

Cut off...	Transfer...	In this example..
At the end of the calendar year	To NARA 15 years after cutoff	Records through the end of calendar year 2015 would be transferred in early 2031
At the end of employee tenure	To NARA 25 years after cutoff	Records from individuals whose tenure ended in 2015 would be transferred in 2041
At the end of the current administration	To NARA 20 years after cutoff	Records from the 2017 to 2020 administration would be transferred in 2041
At the end of calendar year	To NARA in 15 years in 5-year blocks	Records from 2015 through 2020 would be transferred in 2036; records from 2021 through 2025 would be transferred in 2041
At end of employee tenure	To NARA in 5-year blocks 15 years after cutoff	Records from individuals whose tenure ended in 2015 through 2020 would be transferred in 2036; records from individuals whose tenure ended in 2021 through 2025 would be transferred in 2041

Specific to classified email and/or other types of electronic messages, the records must be reviewed prior to transfer to NARA (as with any classified permanent records). Classified email is typically reviewed at 25 years based on standing Executive Orders.

2. Does the GRS apply if Capstone officials have more than one email or messaging account or if their email and/or electronic messages are managed by other staff (such as special assistants, confidential assistants, military assistants, or administrative assistants)?

Yes. Capstone officials often have multiple email or messaging accounts, either based on their titles (for example, ArchivistOfTheUnitedStates@nara.gov), or managed by other staff members on their behalf. Agencies must designate all accounts affiliated with a Capstone official role or position as permanent.

3. Are shared or program accounts covered under this GRS and could they be permanent?

Yes. Shared or program accounts for email or electronic messages, often referred to as group accounts, are common within the federal government. They allow multiple people access to a specific account; for example, a single email account assigned to an entire

program office, or a messaging account assigned to multiple staff to disseminate message blasts.

If any of these accounts involve a Capstone official or fall under category 10 of GRS 6.1, item 010, they should be managed as permanent and included on the form NA-1005. Otherwise, shared accounts can be temporary, and would be covered under items 011 and/or 012 of GRS 6.1.

To determine whether or not a shared account should be included as a permanent account, consider the following:

Scenario	Disposition
<p>The shared account relates to an office or function that otherwise produces permanent records outside of email or other electronic messages.</p> <p>For example, a shared electronic messaging account that allows multiple staff within a public affairs office to interact with the public.</p>	<p>Permanent. Include it in category 10.</p>
<p>The shared account relates to, or is checked by, staff that are otherwise Capstone (permanent) officials.</p> <p>For example, a group email account for the entire General Counsel’s office which is “owned” and utilized by the General Counsel.</p>	<p>Permanent. Include it in the appropriate category. In the example provided, this would be category 8, which already includes the General Counsel.</p>

<p>The shared account relates to an office or function that is administrative. For example, a group email account assigned to a finance office.</p> <p>NOTE: the majority of an agency's shared or program accounts will likely fall into this category.</p>	<p>Temporary. Include in item 011 or 012.</p>
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4. Must agencies maintain a list of Capstone officials and their associated email addresses or messaging identifiers?

Yes. Agencies should maintain an extended version of form NA-1005 that includes this additional information. Doing so will support the requirements in 36 CFR 1235.48, which requires agencies to include proper documentation when transferring permanent electronic records to NARA. The NA-1005 list will help agencies implement Capstone and export and transfer permanent records. Agencies should consider managing and keeping up-to-date a list of Capstone officials and their associated email addresses and/or identifiers for other messages as part of agency policy (one of NARA's recommended best practices). See also [See Section 8: Questions about Permanent Records Transfer](#) related to required documentation at the time of permanent records transfer.

Section 4: Questions related to Temporary Email and other types of Electronic Messages

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1. What is the difference between items 011 and 012?

Item 011 covers all roles or positions that do not fit into the descriptions of either 010 or 012. This item is therefore appropriate for non-Capstone officials who have roles such as: overseeing and instructing workers on the job; reviewing work in progress; observing and securing worker compliance with procedures and methods; planning, revising, and coordinating programs; planning general workflow and methods; budgeting and financial oversight; and completing other mission-related tasks. The majority of temporary accounts should fall into this item.

Item 012 covers routine and/or administrative roles within an agency. Depending on an agency's unique organization, functions, and/or business needs, this item may be appropriate for only a limited number of roles. Agencies having difficulty determining whether item 012 is appropriate should use item 011.

Your agency should conduct a risk analysis to determine which roles and positions, if any, it should include in item 012, and should be able to produce this analysis if needed.

2. Why are supervisory positions excluded from item 012?

Supervisory positions are those that plan, assign, and review work, and evaluate performance. Because these positions tend to be involved in business and personnel decisions, we include them in item 011, which specifies a minimum retention period of seven years.

3. How does an agency determine if it should keep temporary records covered by items 011 and 012 longer than the prescribed minimum retention period?

Items 011 and 012 each prescribe a minimum retention period, and both authorize agencies to dispose of covered records any time after the minimum retention period has ended. This allows an agency to make internal decisions on whether or not it should keep temporary records longer based on business and legal needs.

An agency should involve multiple stakeholders, such as its senior agency official for records management, general counsel, chief information officer, records officer, inspector general, etc., to determine the appropriate retention period for the agency's email and other types of electronic messages. This should include determining if the agency is subject to inspection, audit, legal, and other regulatory requirements that require a longer agency retention period to meet certain obligations. Ultimately, the

agency will document and disseminate the retention period via agency policy and implementation tools. See [Section 5, Questions about Implementation, for additional information.](#)

Agencies may determine that using only item 011 as one agency-wide retention period for all temporary records may better meet its business and legal needs and may be easier to implement. Agencies choosing to use only item 011 for all temporary email may also maintain accounts longer for business needs (for example 15 years) without requesting additional authority from NARA.

4. Why is the minimum retention period for item 011 seven years?

NARA has determined that seven years is a reasonable and appropriate baseline retention period for temporary email and other types of electronic messages, not only to meet agency business needs, but also to ensure agencies are adequately and properly documenting the policies and transactions of the federal Government. Preserving these records for this period should also generally allow the Government to adequately defend itself in litigation or vindicate a plaintiff's rights in the event the Government has infringed on them. This retention period is also consistent with most statutes of limitations on pursuing matters against the United States (usually six years or less), with recordkeeping requirements set by Congress (such as the seven-year retention period for audit-related records established in the financial reforms of Sarbanes-Oxley), and with the IRS's seven-year retention period for personal tax records (tied to the six-year statute of limitations for criminal violations of the tax code). These, and similar examples, led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records. See question 3 above on when a longer-than-seven-year retention period might be appropriate for certain agencies. Agencies that wish to seek a shorter retention period must submit an agency-specific schedule.

This Capstone GRS allows agencies to elect a shorter retention period using item 012 (three years) for a limited group of specific roles and positions. Please refer to FAQ 1 above for additional information.

Section 5: Questions related to Temporary Email and other types of Electronic Messages

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1. Does this GRS apply to classified email and messaging accounts?

Yes. This GRS applies to all records regardless of classification level. Agencies must include accounts on classified networks or systems within the relevant item on the GRS. For example, a Capstone official (permanent) with both classified and unclassified email accounts would have both included under item 010 of this GRS.

This requirement applies whether or not the agency submitting the form owns the classified network or system that hosts the classified account. For example, if your agency has an agreement to utilize and / or access accounts on the Secret Internet Protocol Router Network (SIPR) or the Joint Worldwide Intelligence Community System (JWICS), but your agency does not own those networks, the management of the email within those accounts is still the responsibility of your agency. Those accounts must be represented on the form.

It is advised that agencies, in these scenarios, establish formal memoranda of understanding (MOUs) with the host(s) to account for ownership, access, and eventual final disposition of the records.

The transfer instructions within item 010 allow agencies to transfer permanent classified email in alignment with declassification review. Agencies often don't review classified records until just prior to the automatic declassification date, which occurs when they are 25 years old. If an agency completes its review earlier than 25 years but after 15 years, the agency should consult with NARA about when to transfer the records.

2. Does this GRS include calendars, appointments and tasks?

Some agencies may not be able to separate email records from other affiliated records, such as calendars, appointments and tasks. In these cases, the agency can include the other records under the Capstone GRS. Inclusion of these records with email or other types of messages should be noted on the form NA-1005 in the scope field. However, when the agency manages these other records separately from email or other types of electronic messages, the agency must have a NARA-approved disposition authority for those records (GRS 5.1, item 010, only covers calendars of *non-Capstone officials*).

3. How does this GRS affect NARA or agency requirements to file email or other types of messages with other related federal records?

When using the Capstone approach for capturing and managing email and other types of electronic messages, agencies must consider whether email and other types of electronic messages (and attachments) should be associated with related records under agency guidance. As a supplement to the Capstone approach, an agency may need to associate certain email and other types of electronic messages that relate to other records, such as case files or project files. This consideration depends on an agency's needs and how it chooses to implement its Capstone approach. This may be accomplished by (1) using electronic pointers (such as metadata tags) to establish linkages, or (2) in select cases, filing with associated paper or electronic case or project files.

4. Why do we only include acting Capstone officials in item 010 if they are acting for longer than 60 days?

The requirement to designate email belonging to acting Capstone officials as permanent only after they have served more than 60 days is in line with other government regulations and policies, such as the Office of Government Ethics requirements for filing financial disclosure forms. The presumption is that individuals acting in a position for more than 60 days are carrying out the duties of the position, while individuals acting for less than 60 days are serving primarily in an administrative role.

5. Are there any exceptions to the requirement to designate any acting official as a Capstone official after 60 days or more?

If an individual is on leave for 60 days and will be returning to their position, agencies may require the acting official to copy the Capstone official on emails and may choose not to formally designate the acting individual as a Capstone official. This approach ensures the emails created by individuals acting for more than 60 day are captured in accordance with the GRS requirement. In many situations the individuals in an acting capacity may already be a Capstone official themselves. This effectively means their emails are already captured and managed by the agency, negating the need for additional action by the records officer.

A position may become vacant and acting individuals may fill the position on a rotating basis for less than 60 days. If those acting individuals are performing the full scope of duties of the position, their emails should be captured as Capstone records under item 010.

6. What are additional considerations when implementing the requirement for capturing acting Capstone officials' emails?

Each agency should issue additional policies on how to handle the designation and capture of emails of officials in acting positions. Agencies also need to ensure that

emails of acting Capstone officials are captured for their full tenure as acting, not just beginning on the 61st day.

7. How can an agency incorporate this GRS into its implementation tools and policies?

Best practices include the use of internal implementation tools, such as manuals, handbooks, and/or file plans, for records management execution. As with any GRS, the items should be incorporated into these tools and expanded to include agency-specific information and policies. Agencies should also implement policy around their Capstone approach, to incorporate additional agency specific email and messaging guidance that does not require NARA approval. For example, this could include:

- Clearly defining the retention period for temporary email and other types of electronic messages in policy and agency manuals, since the GRS authorizes banding;
- Developing and implementing policy related to cross-filing requirements; for example, a policy that may require that certain email be cross-filed within permanent case files;
- Developing and implementing policy related to instances where temporary email or other types of electronic messages may need to be retained for a longer period than prescribed by the GRS and supporting agency policy;
- Developing and Implementing policy on the use of Government accounts for personal purposes;
- Defining the Capstone (permanent) accounts/addresses for the agency with more specificity than included in item 010, Email and Other Electronic Messages of Capstone Officials, (for example, those positions and officials specific to your agency). The form NA-1005 is a tool for this;
- Providing additional policy on how to handle email and messages of officials in an acting position;
- Providing policy on managing non-record email and other types of electronic messages;
- Developing policy on when other disposition authorities related to email and other types of electronic messages are appropriate for use, such as the GRS item for transitory records;
- Developing policy related to culling and other opportunities to apply records management to email and other types of electronic messages (See section 861.5 of NARA's sample Directive posted on our Email Management webpage);
- Implementing procedures for initiating record freezes and litigation holds; and

- Implementing procedures for conducting document searches for purposes of FOIA, Congressional, and other access requests.

Section 6: Questions about Legacy Records

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1. How are legacy records defined for GRS 6.1?

In the context of this GRS, legacy records are records that still exist in an electronic format, whether part of a temporary or a permanent account, at the time of Capstone implementation. These records may be stored in an email archiving application, a document management system, in individual files (such as *.PST files) on local computers or drives, within current live email applications/systems, and/or stored in other ways.

2. Does the Capstone GRS apply to both retroactive (legacy/existing) and day-forward records?

Yes. NARA expects an agency using this GRS to apply the items the agency uses to all legacy (existing) records. Agencies should summarize the extent of their legacy records within the “Legacy Scope” field on their form NA-1005. For example, an agency might state that no legacy records exist for the agency before a certain date, as the agency used traditional records management with a print-and-file policy prior to adopting Capstone. NARA acknowledges that legacy records may be incomplete, or that position titles may have changed over time. In cases of title changes, the agency should apply GRS items to equivalent positions.

3. Does legacy email include backup or recovery tapes with email stored on them?

No. These tapes were not created for records management purposes, and are outside the scope of GRS 6.1. Backup/recovery tapes are covered under GRS 3.2, item 050, “Backup files identical to permanent records scheduled for transfer to the National Archives,” or GRS 3.2, item 051, “Backup files identical to temporary records authorized for destruction by a NARA-approved records schedule.”

4. Can other disposition authorities be used to dispose of email and other types of electronic messages prior to using the authorities within GRS 6.1?

Yes. Whether or not to allow the application of other disposition authorities to email and other electronic messages is an agency decision. Agencies should address the application of other disposition authorities in agency records management policy. See [Section 5, Questions about Implementation](#), for additional information.

For example, an agency may apply:

- GRS 5.1, item 020, which authorizes deletion of electronic records once filed in an official recordkeeping system (such as with a related case file, or within another records management application) prior to use of the appropriate item from GRS 6.1;
- GRS 5.2, item 010, which authorizes the deletion of transitory records; and/or
- Other NARA approved, media neutral, agency specific disposition authorities. [See Section 7: Questions about Culling](#), for additional information.

This strategy is essentially applying a certain level of traditional records management before applying the disposition authorities provided in GRS 6.1

5. What do we mean by ‘readable email’?

Readable email is email that is retrievable and usable for as long as needed to conduct agency business, to meet disposition requirements, and to ensure the transfer of permanent records to the legal custody of NARA. This aligns with the requirements of 36 CFR 1236.12(b), related to records management and preservation considerations that must be incorporated into the design, development, and implementation of electronic information systems. Email that is not retrievable and usable is, therefore, not readable.

6. What do I do if I have legacy records that are not readable?

Currently NARA is requiring agencies to submit a schedule for legacy email and other types of electronic messages that are not readable. Please contact the GRS Team at GRS_Team@nara.gov to discuss your situation further.

7. What if the status of legacy email and other types of electronic messages is unknown?

Agencies may still submit, and receive approval of, the form NA-1005. NARA understands that agencies may not be able to fully articulate their legacy records scope, and how legacy email and other types of electronic messages will be addressed, at the time of form submission. This may be due to the complex nature of older technology, access issues, or an agency needing time to inventory legacy records.

In these cases, agencies should notate as much information as possible on the form NA-1005. Examples of responses may be “Agency is still determining the full scope of our legacy records. We believe it dates back to approximately 2003. We will report our

full findings to NARA within 6 months.” or “We have determined the scope of our email, which extends back to 2000, but we are still determining our access issues and will report our full findings to NARA in 6 months.”

Section 7: Questions about Culling

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1. What is culling?

Culling, in the context of Capstone implementation, is the act of removing or deleting material prior to disposition. This may include deleting non-record email and other electronic messages [e.g., email blasts (such as agency-wide communications), spam, and personal email and other types of electronic messages (records belonging to an individual and not related to agency business)], and transitory records (records of short-term interest or that have minimal documentary or evidentiary value). Please refer to [GRS 5.2, item 010, and FAQs about Transitory Records in Electronic Messages](#) for additional information on what constitutes a transitory record.

2. Are agencies expected to cull Capstone (permanent) accounts?

Yes, in order to minimize the amount of non-record and personal records agencies transfer into the National Archives. Since agencies are most familiar with the content of their records, we expect agencies to cull permanent accounts to the greatest extent possible. Culling may be manual, automated, or a hybrid of both. We do not expect agencies to cull temporary accounts, but you may do so in accordance with your agency's policy as appropriate.

For temporary records, agencies may choose the amount of culling it will allow, based on agency business needs and concerns (such as size of the email repository, cost of maintenance, and risk associated with the possible destruction of records that may be needed for agency business, including litigation).

3. What if an agency can't cull records?

An agency should review its policies and technology to determine and verify its culling capabilities. Some technologies may not allow culling as described in question 2 above. Agencies may still implement Capstone for permanent accounts without culling, but this will result in the agency transferring to NARA material that does not meet the definition of a federal record, which NARA might then permanently preserve.

NARA screens and, when warranted, withholds access to accessioned records in accordance with the general restrictions set out in 36 CFR 1256.40-1256.62. NARA decides on the access permitted to accessioned records containing personal privacy information as outlined in 36 CFR 1256.56 without consulting the originating agency. As part of our mission to provide public access to federal government records, we disclose

records whenever legally permissible. As a result, we could release personal information in non-records that an agency or user did not cull prior to transfer.

4. Will NARA cull Capstone records after they are legally transferred?

Yes, NARA has this authority. In accordance with 44 U.S.C. § 2108, the Archivist of the United States assumes custody of these records when they are transferred. NARA administers accessioned records in accordance with 44 U.S.C. Chapter 21, 36 CFR Part 1256, and other rules we promulgate to dispose of non-record materials we find in any transfer. However, we cannot guarantee that we will find or cull non-records.

Section 8: Questions about Permanent Records Transfer

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1. How should agencies transfer email and other types of electronic messages to NARA?

Agencies should transfer email and electronic messages, like any other electronic records, in accordance with current NARA transfer guidelines. Up-to-date guidelines may be found on NARA's accessioning website at <http://www.archives.gov/records-mgmt/accessioning/electronic.html>.

2. Will NARA accept encrypted email and other types of electronic records?

No. As outlined in [NARA Bulletin 2018-01](#), Format Guidance for the Transfer of Permanent Electronic Records, an agency must not transfer to NARA any encrypted permanent electronic records. The Bulletin requires the transferring agency to “[d]eactivate passwords or other forms of file level encryption including digital rights management (DRM) technologies commonly used with audio, video, and some publications that impede access to record data.” Likewise, agencies must decrypt any encrypted email attachments prior to transfer.

3. What documentation must an agency submit when it transfers Capstone (permanent) records?

Please consult [NARA Bulletin 2018-01](#), Format Guidance for the Transfer of Permanent Electronic Records, for our requirements for transferring permanent electronic records. In addition, 36 CFR 1235.48 sets out the documentation agencies must provide to transfer permanent electronic records. This documentation should be an extension of the agency's approved form NA-1005, which documents approved permanent Capstone roles and positions.

Agencies must transfer to NARA the email and other types of electronic messages of Capstone officials captured during their tenure as Capstone officials. Therefore, agencies should treat email and other types of electronic messages of a Capstone official created prior to when the agency designated that person as a Capstone official as temporary and should not transfer that previous email to NARA. For example, the agency would not include electronic messages of Capstone officials sent or received prior to their promotion into a Capstone position. The following is an example of documentation, in the form of a list, of an agency's Capstone officials and the time period for capture of their email as permanent:

Position Title	Name of Position Holder	Email Account/Address	Begin Date of Capture	End Date of Capture
Secretary of [Department]	John Smith	john.smith@agency.gov	January 22, 2013	January 15, 2015
Secretary of [Department]	John Smith (alias account)	Secretary@agency.gov	January 22, 2013	January 15, 2015
Chief Operating Officer	Mary White	mary.white@agency.gov	January 22, 2013	June 1, 2013
Chief Operating Officer	James Anderson	james.anderson@agency.gov	June 2, 2013	December 31, 2020

And below is an example of documentation, in the form of a list, of an agency's Capstone officials and the time period for capture of their other types of electronic messages as permanent:

Position title	Name of Position Holder	Platform and identifier	Begin Date of Capture	End Date of Capture
Secretary of [Department]	John Smith	Phone instant messages, (555) 555-5555.	January 22, 2013	January 21, 2015

Secretary of [Department]	John Smith	WhatsApp messages	January 22, 2013	January 21, 2015
Chief Operating Officer	Mary White	Phone text messages, (444) 444-4444.	January 22, 2013	June 1, 2013
Chief Operating Officer	Mary White	MS 365, Chat Messenger	January 22, 2013	June 1, 2013
Chief Operating Officer	James Anderson	MS 365, Chat Messenger	June 2, 2013	December 31, 2020

Documentation for legacy records should reflect the position title as it existed at the time the records were created. In instances where the position title may not clearly correlate to those on the form NA- 1005 (due to title changes, or positions being eliminated), you should include information on the current position title, or the category from item 010 to which it correlates, in the documentation.

For example, the current “Director of Congressional Affairs” (listed on form NA-1005 under category 6) may have previously been the “Legislative Affairs Officer.” In this case, the documentation should link to the approved NA-1005 form either by providing the current title or listing the proper category under item 010 to which the position fits.

4. How will NARA screen permanent records containing controlled unclassified information for public access?

Generally, federal agency emails and other types of electronic messages will not be transferred to us until they are between *15 and 30 years old*. See [Section 3: Questions Related to Permanent Records](#) for information on how to calculate transfer dates. When an agency initiates a *transfer* of permanent email or other types of electronic messages, the Agency Records Officer must indicate any *FOIA* exemptions that might apply on the request to transfer records into the National Archives.

NARA archivists conduct a careful review to determine what information can be released and what can be withheld under an applicable FOIA exemption when they process closed records for public access. Note, however, NARA generally does not apply FOIA exemption (b)(5) to archival records, which, in any event, now expires after 25 years for information subject to the deliberative process privilege. We also do not consult with the originating agency when releasing unclassified records.

Section 9: Questions about form NA-1005 Resubmission

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1. Is resubmission and re-approval of the form NA-1005 required?

Yes. Please refer to [NARA Bulletin 2022-02](#), Resubmission of Capstone Forms for information on resubmission requirements.

2. What other requirements are related to form NA-1005 changes?

Agencies are reminded to follow the requirements for transfer documentation. [See Section 8: Questions about Permanent Records Transfer](#), for additional information. Agencies may also be required to respond to Capstone and GRS 6.1 related questions on the Records Management Self-Assessment (RMSA), and via other reporting requirements, as appropriate. As outlined above, NARA may request that an agency resubmit based on responses to the annual RMSA, or other reporting mechanisms.

Section 10: Questions about completing the form NA-1005, Verification for Using GRS 6.1

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These FAQs should be consulted in conjunction with the instructions provided within the form NA-1005 itself.

1. Is Senior Agency Official for Records Management (SAORM) approval required on the form?

No. NARA previously required SAORM approval on Form NA-1005 but dropped this approval requirement in September of 2021. Agencies may collect internal concurrences if needed by their own processes.

2. Are all the fields on the “General Information” tab mandatory?

Yes, with the following exceptions:

- **Line 14, superseded form (job) number:** only required if the agency answered “yes” to line 13, “Is this form superseding a previous submission?”
- **Line 20, “additional scope comments:”** only required if the agency is not using the GRS 6.1 for all employees, and/or if other record groups are being submitted for the agency. For example this is required if the agency selects “item 010 only” on the form, in which case the agency needs to explain how temporary records are to be managed.

3. What is the difference between “classified” and “alias accounts” in context of the form fields?

The form NA-1005 has the following two fields on the “General Information” tab:

- Do any of the Capstone officials proposed on this list have accounts on security classified networks or systems?
- Do any of the Capstone officials proposed on this list have secondary or alias accounts, regardless of classification?

In the context of the form, classified and alias accounts are not the same. Having classified accounts, for example, does not automatically equate to having alias accounts.

An agency should answer yes to having classified accounts if any of the positions represented in the 10 categories have accounts on security classified networks or systems, regardless of who hosts that network. Please see [Section 5. Questions about Implementation, FAQ 1, for additional information.](#)

An agency should answer yes to alias accounts only if positions represented on the form have secondary accounts that may be driven by title or position rather than personal name. This is regardless of classification level. For example, the Director of an agency may have a primary account that is driven by their name (such as “John.Smith@agency.gov”), but also a secondary account driven by their title (such as “Director@agency.gov”); this secondary account is an alias account in the context of the form.

4. Is the “Electronic Messages” tab mandatory?

This tab is required if the agency answered “yes” to the “General Implementation Scope” field entry (line 16) on the “General Information” tab. Those that answer “no (email only)” in this field *should not* complete this tab.

5. When is it appropriate to use subsection (b) “Permanent Legacy Records Only” within each of the 10 categories?

This section is used to identify those positions that no longer exist in the agency. It is, therefore, not intended for:

- Those positions that underwent a title change
- Individual positions that were split into multiple positions.
- When multiple positions were merged into one.
- In very rare instances, subsection (b) may also be used when the duties of a position change, resulting in the downgrading of a Capstone (permanent) position to a non-Capstone position.

Agencies should note that more detailed documentation on all permanent accounts is required at the time of legal transfer of the records to the National Archives. [See Section 8: Questions about Permanent Records Transfer](#), for more information.

6. Under section (b) of each category, should the positions listed be carried forward to each subsequent submission, or just new positions that fit this sub-category since the last submission?

Positions should be carried forward until all email of those positions listed has been legally transferred to the National Archives. Once all email has been transferred, the position may be dropped from the form.

7. Where do we document changes to positions?

You will document changes to positions in either subsection (a), **active permanent positions**, or subsection (b), **permanent legacy positions**, within each of the 10 categories.

See question 8 on how to best use the selections within the “summary of changes” field under subsection (a); otherwise, the scenarios below indicate whether to document the changes within subsection (a) or subsection (b):

Scenario	Where document	Example
<p>A position no longer exists in the agency’s organization in any way from a certain date forward.</p>	<p>Document this position in subsection (b) “Permanent Legacy Records Only” of the relevant category.</p>	<p>The “Director, Office of Policy Compliance” position is completely removed from the agency’s organization.</p> <p>Functions performed by this position are not transferred to another position.</p> <p>The position is, therefore, appropriate for inclusion in subsection (b) of the relevant category.</p>
<p>A position is split into two positions. Each of the new positions takes on some of the duties of the previous one position.</p>	<p>Document the two new positions in subsection (a) “Active Permanent Positions” of the relevant category. Best practice is to include the previous title in parentheses next to each new position listed.</p>	<p>The position of “Under Secretary for Compliance and Transparency” is split into two positions: the “Under Secretary for Compliance,” and the “Under Secretary for Transparency.”</p> <p>Both positions should be listed in subsection (a) of the relevant category. Best practice is that for each, “(previously the Under Secretary for Compliance and Transparency”) be included next to each of the two new titles.</p>

<p>The duties of one position are merged with the duties of another position. What was two positions is now one.</p>	<p>Document the new position in subsection (a) “Active Permanent Positions” of the relevant category. Best practice is that the two previous titles should be included in parentheses next to the new position title.</p>	<p>The two positions of “Under Secretary for Compliance” and “Under Secretary of Transparency” are merged into one new position: the “Under Secretary of Compliance and Transparency.”</p> <p>The one new position should be listed in subsection (a) of the relevant category.</p> <p>Best practice is to add the parentheses “(previously the Under Secretary for Compliance and the Under Secretary for Transparency)” next to the new title entry.</p>
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8. For subsection (a), “Active Permanent Positions,” what do each of the possible selections for “summary of changes from previous submission” mean, and when should they be used?

No change. This selection will be very common. When this selection is used, it denotes that no changes have happened since the previous form was approved; if the forms were compared for these positions, they would be identical.

Title change. This is used when a position title changes. Best practice is to indicate the previous title in parentheses. For example, “Director of Public Affairs and Outreach (previously the Director of Public Affairs).”

of accounts / positions has increased. Use where either the number of accounts and / or positions has increased since the last form submission. For example, if the Executive Director was previously denoted as having one account, but they now have two (such as an alias account), then use this selection to indicate the increased number of accounts.

of accounts / positions has decreased. Use where either the number of accounts and / or positions has decreased since the last form submission. For example, if the Executive Director was previously denoted as having two accounts, but they now have one (such as when an alias account was removed from use), then use this selection to indicate the decreased number of accounts.

Position is new since last submission. Use this selection for new positions in the agency’s organization that are appropriate for inclusion within one of the 10 categories. It is for positions that did not exist when the previous form was approved.

Change in category designation. Use this selection to document when a position is being moved from one category to another. For example, a position was previously listed in category 6, but the agency determined that category 5 is more appropriate. This selection is for correcting a mistake in category designation.

Reappraised as permanent (including legacy). Use this selection for positions that meet the definition of the category, but were erroneously left off the previous submission. This selection is used for correcting oversights related to position inclusion.

Not applicable (1st submission). Use this selection for initial form submission (the agency has not previously submitted a form NA-1005). This selection would apply to all positions on the form.

Other. Use this selection when there is no other appropriate selection to describe the change or when there are multiple changes associated with the position. You should be prepared to summarize the changes for your NARA Appraisal Archivist.

9. Under subsection (a) of each category, what if you have more than one response to the question about “changes since last submission”?

Since Excel limits users to only one selection option, you should choose one of the following options:

- Select “other,” and provide additional information to their NARA Appraisal Archivist as needed, or
- Select the option that is the “biggest change” from the previous submission (for example, a title change could be seen as more important information than a change in number of accounts).

The important thing is indicating that a change has occurred since the previous submission to help your NARA Appraisal Archivist review the new form.

10. How do we document vacant positions on the form?

Vacant positions are those that still exist in your organization but are currently unfilled. They should be treated like all other positions and be included on the form. For example, if your agency has the position “Executive Director” but it is currently unfilled, it should still be listed on the form and listed as one (1) position.

Agencies should document the period of vacancy within the transfer documentation required at the time of legal transfer of the records to the National Archives. [See Section 8: Questions about Permanent Records Transfer](#), for additional information.

11. If an agency identifies a new position that fits one of the ten (10) permanent categories after the form has been approved, but the position is then removed

from the organization before the next resubmission cycle, how does the agency document this?

The position should be included in section (b) of the relevant category in the agency's next submission in the regular submission cycle. If the agency prefers to not wait, they may send an "ad hoc" submission outside the standard four-year cycle, pursuant to [NARA Bulletin 2022-002](#).

12. Why do we need to provide an URL to an Agency Organization Chart on the "General Information Tab"?

NARA Appraisal Archivists use the organizational chart to validate the NA-1005. The organization chart needs to be up-to-date and sufficiently detailed to complete this work. The URL for a current organization chart available on a public facing website can be provided via the form. If this is not available, then agencies should submit an organization chart annotated with the Capstone categories to their appraisal archivist.

13. Can my agency submit more than one form per record group (RG)?

Yes. If your agency is large and has a complex organizational structure, you may submit multiple forms for the same RG. This is sometimes appropriate for agencies with large Under Secretary or Bureau levels. Agencies should state which part of the organization the form covers in the "additional scope" statement on the "General Information" tab. We advise that agencies discuss submitting multiple forms with their NARA Appraisal Archivist before submission.

14. What specific positions are included in category seven, Principal Regional Officials, under item 010?

This category may not apply to all agencies, even if they have offices outside of their headquarters. This category is reserved for those positions that have complete oversight and responsibility spanning a larger region (such as, multiple states or specific geographic area) in carrying out mission-critical activities.

For example, an agency may have 10 regions, each with a Regional Administrator that is responsible for mission-critical activities within that region's jurisdictions – these 10 Regional Administrators would fall into this category.

Heads (regardless of title) of offices outside of headquarters, but not under a regionalized structure, are not included in this category. For example, it does not pertain to the heads of individual offices in the field, such as, but not limited to, customer service centers, processing centers, or administrative offices that conduct routine activities (e.g., passport offices, or Social Security claims processing offices, IRS service centers, commissaries).

Agencies may discuss the scope of this category with their NARA Appraisal Archivist during review of their form NA-1005.

15. Under category ten of item 010, how do agencies determine what additional roles and positions they should include as Capstone officials?

Category ten, “Additional roles and positions that predominantly create permanent records related to mission-critical functions or policy decisions and/or are of historical significance,” is a catch-all category for those roles and positions whose email is appropriate for permanent retention, but not represented in the other nine categories. This could include email of staff in lower level positions, email related to functions in lower-level offices, or email in “service” accounts that agencies use to disseminate policy. For example, an agency with mission-centric task forces should include the head of each task force within this category if not captured in other categories. As with the other categories, the agency must include these roles and positions on its form NA-1005 if it has them.

It is possible that an agency will have no roles and positions for this category.

16. Can an agency alter the form to report additional information such as create new fields, delete tabs, add tabs, etc.?

No. The form NA-1005 is a formal NARA form and may not be altered. If you have supplemental information to add, you may send it to your [NARA Appraisal Archivist](#) as part of the form review process.