

GRS 6.1, Email and Other Electronic Messages Managed Under a Capstone Approach

This file contains two documents. The Draft Schedule contains the proposed text of the new GRS in publication format. The Draft Appraisal Memorandum provides additional background explanation and includes the appraiser's justification for the retention decisions proposed in the schedule.

THE SCHEDULE IS NOT APPROVED FOR USE.

National Archives and Records Administration
Office of the Chief Records Officer
GRS Team
June 25, 2026

GENERAL RECORDS SCHEDULE 6.1:

Email and Other Electronic Messages 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 and Other Electronic Messages 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. Agencies must also incorporate this GRS into agency records management implementation tools, such as manuals and file plans. Agencies adopting a Capstone approach should consult other resources related to email and electronic message management, specifically the Capstone approach available on NARA's [email management page](#).

Agencies must not implement this GRS until obtaining approval of [NARA form 1005 \(NA-1005\), Verification for Implementing GRS 6.1](#). Agencies are required to obtain approval of a resubmitted NA-1005 in compliance with NARA guidance, including when there is a major agency reorganization. NARA will also communicate government wide resubmission requirements, which will operate roughly every four years. . Additional information, including a link to the form, may be found in the FAQs and in the instructions accompanying the form.

GRS Scope

This GRS provides disposition authority for email records and certain types of electronic messages. Agencies with approval to use this GRS must apply it to email records, but may choose to also apply it to the other allowable types of electronic messages outlined below; this must be documented on the NA-1005. Agencies wishing to schedule electronic messages outside the scope of this GRS may submit an agency-specific schedule proposing a different scope.

Email

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 and tasks.

Other Types of Electronic Messages

The GRS does not cover all types of electronic messages. Agencies may choose to use this GRS for instant messages, text messages, and chat messages that serve a similar purpose as email to facilitate communication and information sharing. This includes:

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- messages affiliated with email system chat or messaging functions, and where the messages are managed independently from the email;
- messages from messaging services provided on mobile devices; and
- messages from messaging services on third-party applications.

Exclusions to all items below:

- messages affiliated with social media accounts/social media direct messaging services;
- messages affiliated with messaging services provided on video conferencing applications and services;
- voice mail (or similarly recorded) messages;
- messages affiliated with collaboration platforms; and
- messages from messaging systems that are ancillary to the purpose of a larger system (for example, a chat function built into a procurement system).

These records still require NARA-approved disposition authority but are not covered under this GRS. See the GRS 6.1 FAQ for specific examples of the inclusions and exclusions.

Additional Scope

Each agency is responsible for determining the scope of implementation when using Capstone, including, 1) whether implementation is to include only email, or to also include other types of electronic messages; 2) The range of implementation in an organization (agency-wide, specific office, etc.); and 3) the range of implementation regarding email and/or other types of electronic messaging technology and system platforms. Brief information on the scope of an agency's Capstone implementation is also required on the NA-1005.

Agencies are also responsible for defining (and documenting through policy) the official recordkeeping version of email and/or other types of electronic messages to be managed under a Capstone approach, especially when records are captured or retained in multiple locations (e.g., an email archive vs. the live system). Agencies will need to determine the appropriate disposition for other versions of email and other types of records, whether disposable under GRS 5.1, item 020, or as non-record.

Agencies are expected to apply documented selection criteria to cull the records of Capstone officials (permanent accounts) to the greatest extent possible before transfer to NARA. Culling refers to the removal – or otherwise excluding from capture – of nonrecord, personal, or transitory messages and attachments. Culling typically includes the removal of spam, message blasts received (such as agency-wide communications), and personal materials (such as emails or messages to family members not related to agency business). Culling may be manual, automated, or a hybrid of both. Agencies may develop their own policies and procedures for the culling of temporary accounts. Additional information on culling is found in the FAQ for GRS 6.1.

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Applying this GRS

When applying this GRS in part, agencies must ensure that all other records are covered by another NARA-approved disposition authority. Agencies NOT managing any of their email or other types of electronic messages under the Capstone approach are still responsible for managing these records by applying NARA-approved records schedules.

If an agency is implementing a Capstone disposition approach different from what is provided in this GRS, the agency must submit a records schedule. For example, an agency may want to narrow the list of required positions in item 010, use shorter retention lengths for temporary records, or extend the time frame for transfer of permanent records. Agencies who wish to use Capstone for a broader range of electronic messages, specifically those excluded from this GRS, may also submit an agency-specific schedule.

Item	Records Description	Disposition Instruction	Disposition Authority
010	Email and other electronic messages of Capstone officials. Capstone Officials are senior officials and other mission-critical positions designated by account or position level. This may be by email addresses, whether the addresses are based on an individual's name, title, a group, or a specific program function, and/or by phone number or other identifier for other types of electronic messages. Capstone officials include all those listed on an approved NARA form 1005 (NA-1005), <i>Verification for Implementing GRS 6.1</i>, and <i>must</i> include, when applicable: 1. Agency Head Position(s). The head of the agency, such as Secretary, Commissioner, Administrator, Chairman or equivalent; 2. Principal Assistants to Agency Head Position(s). Principal assistants to the head of the agency (second tier of management), such as Under Secretaries, Assistant Secretaries, Assistant Commissioners, and/or their equivalents; this includes officers of the Armed Forces serving in comparable position(s); 3. Deputy Position(s). Deputies of all positions in categories 1 and 2, and/or their equivalent(s); 4. Mission-related Assistant Positions. Mission-related staff assistants to those positions included in categories 1 and 2, such as special assistants, confidential assistants, military assistants, and/or aides. Excludes assistants performing purely administrative work (for example, a travel coordinator) and/or those assistants whose email and/or work is substantially captured in the email of those staff members they support;	Permanent. Cutoff and transfer in accordance with the agency's approved NA-1005, <i>Verification for Implementing GRS 6.1</i>. NOTE: The standard transfer time for all records will be 25 years, with an option to transfer at 30 years. For classified email, review and declassification	DAA-GRS-2026-0003-0001

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	5. Principal Management Positions. Principal management positions, usually those required by statute, such as Chief Operating Officer, Chief Data Officer, Chief Information Officer, Chief Knowledge Officer, Chief Technology Officer, and Chief Financial Officer, and/or their equivalent(s); 6. Mission-related Program Office Positions. Directors/heads of significant <u>mission</u>-related offices, and/or their equivalents, who primarily report directly to positions represented in categories 1, 2, or 3. Excludes directors/heads of administrative or mission-support functions, such as human resources, general agency security, procurement, grant administration, records management, etc. (generally, those positions overseeing offices creating records primarily covered by the GRS); and those positions where the email and/or work is substantially captured in the email of those senior leaders to whom they report (primarily those in categories 1, 2, or 3).; 7. Principal Regional Positions. Principal regional officials, such as Regional Administrators, and/or their equivalent(s) for those agencies that are formally regionalized, and those regions have autonomy for mission-related functions. This category only includes those positions that have complete oversight and responsibility spanning a larger region (such as multiple states or a specific geographic area) in carrying out mission-critical activities. Excludes administrative-level regional offices and general field offices, such as customer service centers, recruitment centers, processing centers, etc.; and positions where the email and/or work is substantially captured in the email of those senior leaders to whom they report (primarily those in categories 1, 2, or 3); 8. Senior-level, Agency-wide Advice and Oversight Positions. Roles or positions that routinely provide <u>agency-wide</u> advice and oversight, including General Counsels, Chiefs of Staff, Inspectors General, Senior Advisors not captured in other categories, etc. Excludes similar titles that have limited jurisdiction within the agency (such as a program-level Chief of Staff); 9. Other PAS Positions. Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions); and 10. Additional Positions. Additional roles and positions that predominantly create permanent records related to mission critical functions or policy decisions and/or are of historical significance. This includes agency-liaison officials and/or representatives: Officials that liaison with other agencies and/or governments on mission-related matters, including White House liaisons. Excludes positions where the email and/or work is substantially captured in the email of other accounts already represented in other categories. This item covers emails and/or other types of electronic messages of officials captured during their tenure as a Capstone official only. Therefore, records created prior to their onboarding as a Capstone official (e.g., prior to	requirements apply. See the NA-1005 form instructions and the GRS 6.1 FAQ for additional information, including about permanent records transfers.	
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	their promotion/rotation into a Capstone position) are excluded and should be disposed of with other NARA-approved disposition authorities, including - but not limited to - items 011 and 012 of this schedule. This also includes those officials in an acting capacity for any of the above positions longer than 60 days. Agencies may also include individual emails and/or other types of electronic messages from otherwise temporary accounts appropriate for permanent disposition in this category. This item <i>must</i> include all existing legacy email and/or other types of electronic messages that correlate to the roles and positions described above. If a Capstone official has more than one agency-administered account, this item applies to all accounts. If a Capstone official has an email account managed by other staff (such as personal assistants, confidential assistants, military assistants, or administrative assistants), this item applies to those accounts. This item applies to all email and/or other types of messages regardless of the address names and/or phone number(s) used by the Capstone official for agency business, such as nicknames or office title names. Email to or from personal or non-official email and/or other messaging accounts in which official agency business is conducted is also included – a complete copy of these records must be copied or forwarded to an official electronic messaging account of the officer or employee not later than 20 days after the original creation or transmission of the record. Please consult the NA-1005 for more information on which positions are included within each category. Not media neutral; applies to records managed in an electronic format only. Exclusions: see exclusions under the GRS Scope section, as well as within each of the ten categories, above. Notes: 1. Cabinet level agencies implementing a Capstone approach that includes their components/operatives must apply the above definition to each component individually. In these cases, each component/operative is considered a separate agency in terms of the above definition of Capstone Officials. A component/operative of a cabinet level agency can implement a Capstone approach independent of their department but must also conform to the entirety of this definition.		
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	2. Smaller agencies, micro-agencies or Commissions implementing a Capstone approach may find that some of their Capstone positions fall into several of the categories above and/or that they do not have applicable roles or positions for all categories. <i>Supersedes: DAA-GRS-2022-0006-0001, Email and other electronic messages of Capstone officials -permanent.</i>			
011	Email and other types of electronic messages of Non-Capstone officials. Email and/or other types of electronic messages of all other officials, staff, and contractors not included in item 010. Note: Agencies <i>only</i> using item 011 and/or item 012 of this GRS may not dispose of any records of officials in item 010, Email and other electronic messages of Capstone Officials, of this GRS without authority from NARA in the form of another GRS or agency-specific schedule. Submission and approval of NA-1005 is still required in these instances to document those being exempted from Capstone.	All others except those in item 012. Includes positions and records not covered by items 010 or 012 of this schedule. This item applies to the majority of email and other messaging accounts/users within an agency adopting a Capstone approach. Not media neutral; applies to records managed in an electronic format only. Exclusions: see exclusions under the GRS Scope section above. <i>Supersedes: DAA-GRS-2022-0006-0002, Email and other types of electronic messages of Non-Capstone officials, All others except those in item 012 - temporary, 7 years</i>	Temporary. Delete when 7 years old, but longer retention is authorized if required for business use.	DAA-GRS-2026-0003-0002
012	Agencies have discretion to designate individual email messages and/or other types of electronic messages, with their attachments as permanent, or as longer-term temporary records that should be cross-filed elsewhere pursuant to agency policies and business needs.	Support and/or administrative positions. Includes non-supervisory positions carrying out routine and/or administrative duties. These duties comprise general office or program support activities and frequently facilitate the work of federal agencies and their programs. This includes, but is not limited to, roles and positions that: process routine transactions; provide customer service; involve mechanical crafts, or unskilled, semi-skilled, or skilled manual labor; respond to general requests for information; involve routine clerical work; and/or primarily receive nonrecord and/or duplicative email.	Temporary. Delete when 3 years old, but longer retention is authorized if required for business use.	DAA-GRS-2026-0003-0003

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		Not media neutral; applies to records managed in an electronic format only. Exclusions: see exclusions under the GRS Scope section above. <i>Supersedes: DAA-GRS-2022-0006-0003, Email and other types of electronic messages of Non-Capstone officials, Support and/or administrative positions. - temporary, 3 years</i>		
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Date: June 25, 2026
Appraiser: ACRS
Agency: General Records Schedules (GRS)
Subject: DAA-GRS-2026-0003

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INTRODUCTION

Schedule Subject

GRS 6.1, Email and Other Electronic Messages Managed Under a Capstone Approach

Additional Background Information

NARA first issued GRS 6.1 in 2015 to support the mandate that all federal agencies manage email in an electronic format. GRS 6.1 also supports NARA Bulletins 2013-02, *Guidance on a New Approach to Managing Email Records*, and 2023-02, *Expanding the Use of a Role-Based Approach (Capstone) for Electronic Messages*.

Pursuant to NARA Bulletin 2022-02, *Resubmission of Capstone Forms*, the next government-wide resubmission cycle for all NA-1005 forms (Verification to use GRS 6.1) is scheduled for early 2027. With this in mind, NARA determined it was a good time to explore revising GRS 6.1, especially after reviewing and approving over 550 NA-1005 forms over the past two submission cycles. After 11 years of reviewing NA-1005 submissions to use GRS 6.1 we have identified many areas for improvement. These improvements include:

- 1) Redefining the ten (10) permanent email category definitions within item 010, *Email and other electronic messages of Capstone officials*. NARA identified a lack of consistency in the positions federal agencies identified as permanent due to lack of clarity in many categories under item 010. The new language:
 - a) Adds some clear exclusionary language to multiple categories.
 - b) Removes the requirement to capture clearly administrative positions, especially in category 4 (assistants to senior officials).
 - c) Provides a mechanism for excluding certain positions when an agency can document that the email of those positions is substantially captured in the email of the other Capstone positions to whom they report. This will especially affect positions in categories 4, 6, and 7.
 - d) Gives NARA more flexibility to make decisions to exclude certain positions during the review of NA-1005 forms. This will grant NARA the flexibility to exclude specific positions either wholesale or on a case-by-case basis.

- 2) Extending the standard transfer instruction to 25 years for the permanent email covered under item 010. Email transferred under GRS 6.1, item 010, is typically access restricted at the time of transfer, primarily under FOIA(b)(5), privileged communications (deliberative); and (b)(6), personal privacy. The new 25-year standard allows agencies, who know their records best, to make access decisions. Further, this ensures that many access restrictions will be lifted by the time of legal transfer to NARA.
- 3) Minor clarification and process-related edits, including softening the resubmission requirement statement in the background information to provide flexibility for this process.

The revisions proposed on this schedule strike a balance: The majority of federal agencies will see a reduction in the number of permanent accounts they must manage and ultimately transfer to NARA. Despite this reduction in permanent accounts, NARA will still archive a substantial amount of permanently valuable email and electronic messages from senior officials. The positions captured will continue to document agency missions and formal actions.

Currently, over 19,500 positions across the government are approved as permanent. Although NARA will not be able to ascertain the number of permanent positions reduced via these revisions until the 2027 resubmission is complete, it is estimated that the revisions would see a reduction of approximately 10 percent. This could be highly dependent on when agencies are able to document that the email of certain positions (primarily in categories 4, 6, and 7) are captured within the email of the positions being supported in higher categories (1, 2, and 3).

In addition to these revisions to GRS 6.1, NARA is working on additional guidance. We will revise the FAQs to include a question that addresses how agencies may request earlier transfers on an as-needed basis. We are also working on new guidance to help agencies better ensure the preservation of email and other electronic records while in agency custody. We anticipate that this guidance will summarize existing requirements and provide some best practices for the proper management of these records.

We will also revise the NA-1005 form to align with the new changes.

Revising GRS 6.1 was a NARA-wide effort. The NARA Capstone Development Team (CDT), composed of representatives from Records Management Operations within Agency Services (ACR), NARA's General Counsel (NGC), NARA's electronic records accessioning unit (RRDA), NARA's own records management shop, and others, was involved in this process.

Overall Recommendation

Approval of the attached schedule is recommended based on NARA Directive 1441 Appraisal Policy of the National Archives and Records Administration, appraisal site visits where appropriate, and the representations made by the agency regarding these records.

APPRAISAL

Item 0001: Email and other electronic messages of Capstone officials

Media Neutrality: Not Approved; records are digital only

Superseded items:

- DAA-GRS-2022-0006-0001, Email and other electronic messages of Capstone officials

Reason for rescheduling: To redefine the ten (10) categories of positions and roles captured within this item and to standardize the legal transfer of these records to NARA to a 25 year timeframe. The item is otherwise unchanged, and is remaining permanent.

Proposed Disposition: Permanent

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- Records significantly document actions of the federal government essential to understanding and evaluating government actions. Agencies conduct official business via email and other electronic messages, and capture of these records as permanent ensures preservation of these actions.
- Previously approved as permanent.

Adequacy of Proposed Transfer Instructions: Appropriate. As noted above, email transferred under GRS 6.1, item 010 typically comes with access restrictions, primarily (b)(5), privileged communications (deliberative); and (b)(6), personal privacy. The 25 year transfer timeframe will allow agencies to make access decisions, and allow for many of these restrictions to be lifted by the time the records are eligible for legal transfer to NARA. This reduces legal risks for all parties. A new FAQ will address when agencies may request earlier transfers on a case-by-case basis.

Item 0002: Email and other types of electronic messages of Non-Capstone officials, All others except those in item 012.

Item 0003: Email and other types of electronic messages of Non-Capstone officials, Support and/or administrative positions.

Media Neutrality: Approved

Superseded items:

- DAA-GRS-2022-0006-0002, Email and other types of electronic messages of Non-Capstone officials, All others except those in item 012
- DAA-GRS-2022-0006-0003, Email and other types of electronic messages of Non-Capstone officials, Support and/or administrative positions

Reason for rescheduling: Due to the changes to item 0001, which is removing positions from the permanent category and moving them into these items, it was necessary to update these two items as well. The text of the items is otherwise not changing.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- The records do not meet the appraisal criteria for permanent preservation. Email and electronic messages created / received by this level of staff do not usually involve policy-development and mission-critical decisions. As the GRS notes, any email or messages that do meet this criteria should still be denoted as permanent, and / or cross-filed with an appropriate related record series.
- Previously approved as temporary.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. There is no change in the retention of these records.