

GRS 6.1 Email Managed Under a Capstone Approach

This file contains three documents. The Draft Schedule is the proposed text of the new GRS in publication format. The FAQ supplements the new GRS, and will be issued simultaneously. The Draft Appraisal Memorandum provides additional background explanation and includes the appraisers' justification for the retention decisions proposed in the schedule.

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National Archives and Records Administration
Office of the Chief Records Officer
July 21, 2014

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. Agencies should consult the Capstone GRS FAQs when implementing this GRS. Additional information on the Capstone approach can be found in the NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone].

GRS Scope

Email, in the context of this GRS, refers to individual electronic messages and any associated attachments. 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. Finally, this GRS applies to all email regardless of what email technology is used. For further guidance on email, see the NARA transfer format guidance that provides additional information on email and [36 CFR 1235](#).

Each agency is responsible for determining the scope of implementation when using Capstone, including:

- The range of implementation in an organization (agency-wide, specific office, etc.);
- The range of implementation regarding email technology and system platforms;
- The inclusion of day forward/active and/or legacy/inactive email; and
- The inclusion of classified email.

Agencies should cull the email of Capstone officials before transfer to NARA. Culling refers to the removal – or otherwise excluding from capture – of non-record, personal, or transitory messages and attachments to the extent possible. Culling typically includes the removal of spam, email blasts (such as agency-wide communications), and personal materials (such as emails to family members not related to agency business). Culling may be manual, automated, or a hybrid of both. Records affiliated with other commonly available functions of email programs such as calendars/appointments, tasks, and chat may be included when separation from email is not possible.

Applying this GRS

When applying this GRS in part (for example, using item 011 only), agencies must ensure that all other email records are covered by another NARA-approved disposition authority. Agencies NOT managing any of their email under the Capstone approach are still responsible for managing their email by applying NARA-approved records schedules.

If agencies are implementing a Capstone disposition approach different from what is provided in this GRS, the agency must submit a records schedule. For example, agencies may want to narrow the list of minimum positions in item 010, use shorter retention lengths for temporary records, or extend the time frame for transfer of permanent records.

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Agencies have the discretion to designate individual email messages and attachments as short-term or transitory records covered by another GRS; or as permanent or longer-term temporary records otherwise covered by an existing GRS or agency records schedule. Agencies must transfer to NARA the emails of Capstone officials captured during their tenure as a Capstone official. Therefore, email of Capstone officials created prior to their designation as a Capstone official (e.g., prior to their promotion/rotation into a Capstone position) should be treated as temporary and not transferred to NARA.

Definition and Designation of Capstone Officials (applies to item 010)

Capstone Officials are top senior officials designated at the account level or by email addresses, whether the addresses are based on an individual's name, title, a group, or a specific program function. Capstone (permanent) officials **must** include, when applicable:

- 1) The head of the agency, such as Secretary, Commissioner, Administrator, Chairman and/or equivalent; this includes officers of the Armed Forces serving in comparable positions and agency deputies;
- 2) Senior positions such as Under-Secretaries, Assistant Secretaries, and Assistant Commissioners; this includes officers of the Armed Forces serving in comparable positions;
- 3) Heads of components and sub-agencies within a larger cabinet agency;
- 4) Roles or positions that routinely and directly advise the above positions, including special advisers, General Counsels, Chiefs of Staff, etc.;
- 5) Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS); and
- 6) Those officials in an acting capacity for any of the above positions longer than 60 days.

If a Capstone official has more than one agency-administered email account, the GRS 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 GRS applies to those accounts. This GRS applies to all email regardless of the address names used by the Capstone official for agency business, such as nicknames or office title names.

Additional email addresses **may** be included, representing roles, positions, and/or programs within the agency that predominantly create permanent records related to mission critical functions, policy decisions, and/or are of historical significance:

- 1) Directors of significant program offices;
- 2) Heads of task forces;
- 3) Principal regional officials;
- 4) Staff assistants to the above-listed officials, such as special assistants, confidential assistants, military assistants, or administrative assistants; and/or
- 5) Accounts of staff or functions in lower-level positions or offices.

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Item	Records Description	Disposition Instruction	Disposition Authority
010	<p>Email of Capstone Officials. Email of officials listed in the <i>Definition and Designation of Capstone Officials</i> section of this schedule.</p> <p>Agencies must transfer documentation adequate to identify, service, and interpret the permanent electronic records in accordance with 36 CFR 1235.48, which includes the position title and begin and end dates for each email account captured in this item.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p>	<p>Permanent. Transfer email to NARA no sooner than 15 years, and no later than 25 years after agency determined cut off (cutoff may be by presidential term, annually, end of user tenure, or based on other agency practices).</p>	<p>DAA-GRS-2014-0001, item 0001</p>
011	<p>Email of Non-Capstone Officials. Email of officials not listed in the <i>Definition and Designation of Capstone Officials</i> section of this schedule. This item covers all emails not included in item 010.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> <p>NOTE: Agencies only using this item of this GRS (and not using item 010) may not dispose of any email of officials listed in the must section of the <i>Definition and Designation of Capstone Officials</i> section of this GRS without authority from NARA in the form of another GRS or agency-specific schedule.</p>	<p>Temporary. Delete when between 3 and 7 years old, but longer retention is authorized if required for business use.</p>	<p>DAA-GRS-2014-0001, item 0002</p>

Frequently Asked Questions (FAQs) About Using GRS 6.1 Email Managed Under a Capstone Approach

These FAQs are designed to aid in implementation of the issued Capstone GRS.

GENERAL

1. How does an agency document that they are using the Capstone GRS?

There are already several existing requirements that should be considered for the proper documentation of an agency's use of the Capstone GRS, and the Capstone approach in general. This includes, but is not limited to:

- a) Update the agency's records management directive and send to NARA per [36 CFR 1220.34\(c\)](#);
- b) Post the agency's records management directive on the agency's website per the FOIA, [5 USC 552\(a\)\(1\)\(D\)](#) and [Open Government Directive](#); and
- c) Respond to any questions in NARA-issued requests for information [per 44 USC Chapter 29](#), including those specific to Capstone use and implementation.

2. May an agency deviate from this GRS?

No, an agency using this GRS must follow the instructions for each relevant item. An agency wishing to deviate from one or both items must submit an agency-specific records schedule. Reasons for submitting an agency-specific schedule may include, but are not limited to:

- The agency determines that excluding one or more of the officials included in the **must** section of the Definition and Designation of Capstone Officials is appropriate (such as due to the non-substantive nature of their work or that their email is captured within that of another Capstone official);
- The agency determines a need to establish a transfer date outside the range set within item 010 (e.g., shorter than the minimum; longer than the maximum); or
- The agency wants the authority to dispose of temporary email earlier than the dates prescribed in item 011.

Agencies are encouraged to discuss scheduling options with their [NARA Appraisal Archivist](#).

3. Who are the Capstone officials covered by this GRS?

Capstone officials will vary agency by agency, depending on how the roles at the agency are carried out. Some agencies will have more Capstone officials than others. Refer to the “Definition and Designation of Capstone Officials” section of the GRS.

4. How do agencies determine what other agency staff should be included as Capstone officials?

Agencies may determine that there are additional staff appropriate for inclusion within offices that create or maintain permanent records. As included in the *may* section of the “Definition and Designation of Capstone Officials,” this should include roles, positions, or programs that predominantly create or maintain permanent records related to mission-critical functions, policy decisions, or have historical significance that are not listed in the *must* section.

5. Does the GRS apply if a Capstone official has more than one email account or if their email is managed by other staff (such as special assistants, confidential assistants, military assistants, or administrative assistants)?

Yes. Senior officials often have multiple email accounts, either based on their title (e.g., ArchivistOfTheUnitedStates@nara.gov), or managed by another staff member on their behalf. All accounts affiliated with a Capstone official role or position must be designated as permanent.

6. Is my agency required to maintain a list of Capstone officials and their associated email addresses?

Although not a direct requirement of the Capstone approach or this GRS, an agency will be responsible for the proper implementation of Capstone, including ensuring up-to-date account designations. Maintaining a list will help with implementing Capstone and with facilitating the export and transfer of permanent emails. Best practices include the management of a list of Capstone officials and their associated email addresses as part of agency policy, which should be kept up-to-date. This will also support the requirements in 36 CFR 1235.48 that proper documentation be included with the transfer of permanent electronic records. See also question 18.

7. How does an agency assign disposition for temporary email within the band provided in item 011?

Agencies should be judicious in determining the appropriate retention for temporary email within the provided band, and document this internally in manuals, handbooks, file plans, and/or policies. A 3 year retention may be appropriate for some lower-level staff carrying out routine and consistent duties (processing claims, conducting site visits,

providing routine customer service) and those who primarily receive informational (FYI) email; a 7 year retention may be more appropriate for other levels of staff. Agencies may also apply a longer retention period for other levels of staff, such as middle management, as business need requires. For example, an agency may set retention for email of middle management at 15 years. Agencies are reminded, however, that creating multiple retention tiers may require increased oversight of the tools and technology being used to implement Capstone.

IMPLEMENTATION

8. May an agency implement portions of this GRS?

Yes, an agency may use either item 010 or item 011, or both. If applying this GRS in part (for example, only using item 011), agencies must ensure that all other email records are covered by another NARA-approved disposition authority. Agencies that are only using item 011 are further reminded that they may not dispose of the email of any official listed in the must section of the Definition and Designation of Capstone Officials section of the GRS without authority from NARA in the form of another GRS or agency-specific schedule.

This 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) only, and add management of temporary email within their overall Capstone approach later.

9. Does the Capstone GRS apply to both retroactive and day-forward email?

Each agency should make the decision, and document such in agency policy, whether implementation of Capstone is retroactive (applies to bodies of email created prior to Capstone implementation) or day-forward. Some agencies, for example, may have had other email filing policies in place prior to Capstone implementation, and prefer that Capstone be from a certain date forward.

10. Does this GRS also include calendars, appointments, tasks, chat transcripts and other communications?

Although the Capstone Approach was designed for the management of email records, some agencies may not be able to separate email records from other affiliated records, such as calendars, appointments, tasks, and chats. In these cases, the records may be included. In instances where these affiliated records are managed separate from the email, agencies must have NARA approved authority for their disposal.

11. How does this GRS affect NARA or agency requirements to file email records with other related Federal records?

As a supplement to the Capstone approach, an agency may want or need to associate certain email records that relate to other records, such as case files or project files, with the related records. This consideration depends on an agency's needs and how it chooses to implement its Capstone approach.

12. How can this GRS be incorporated into existing agency implementation tools?

Best practices include the use of internal implementation tools, such as manuals, handbooks, and/or file plans for records management execution. Like with any GRS, the items should be incorporated into these tools, and expanded to include agency-specific information and policies. For example, this could include:

- Clearly defining the retention period for temporary email in policy and agency manuals, since the GRS authorizes banding;
- Defining the Capstone (permanent) accounts/addresses for the agency in more specifics than provided in the Definition and Designation of Capstone Officials section included in this GRS (for example, those positions and officials specific to your agency);
- Instructions for non-record, including personal, email;
- Information on agency policy related to culling and other opportunities to apply records management against email; and
- Procedures for initiating record freezes and litigation holds.

CULLING

13. What is culling?

Culling, in the context of Capstone implementation, is the act of removing or deleting material prior to disposition. This may include deletion of email blasts (such as agency-wide communications), spam, personal email (records belonging to an individual and not related to agency business), and/or transitory email (records of short term interest or that have minimal documentary or evidentiary value).

14. Can agencies/users cull Capstone email accounts?

Yes. Since agencies are most familiar with the content of their email record, culling permanent accounts is expected to the extent possible. Culling may be manual, automated, or a hybrid of both. Agencies may adopt a different policy for the management of temporary email, based on agency business needs, including 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.

15. What is an agency can't cull email?

An agency should review its policies and technology to verify its culling capabilities. Some technologies may not allow culling as described above. Agencies may still implement Capstone but must understand that this will result in the transfer and potential preservation of emails that do not meet the definition of a Federal record for permanent accounts. NARA screens records in accordance with the general restrictions set out in 36 CFR 1256.40-1256.62. Assessment of personal privacy for accessioned records, per 36 CFR 1256.56, is undertaken by NARA with no consultation with the originating agency. As part of NARA's mission to provide public access to Federal Government records in our custody and control, weight is put on disclosure when legally permissible.

16. Will NARA cull Capstone email after it's legally transferred?

Since agencies are most familiar with the content of their email records, they should cull non-record material before transferring. If agencies are unable to perform that action, NARA reserves the right to cull any records transferred in our legal custody according to standard archival practices. NARA cannot, however, guarantee any level of culling.

TRANSFER

17. How is Capstone email cut off for eventual transfer to NARA?

Agencies should determine an appropriate cut-off based on business use. Cutoff may be by Presidential term, the account user's tenure, annually, or based on other agency practices. Agencies may also determine that blocking of email for disposition is appropriate (for example, email that is cut off annually is managed in 5 year blocks; with transfer occurring 15 years after the last year blocked). Any cut-off instructions must be included in the agencies records management directive (see question 1).

18. What documentation is required with the transfer of Capstone email?

See NARA's [transfer guidance](#) for further information about NARA's requirements for transferring permanent electronic records. In addition, 36 CFR 1235.48 contains requirements for proper documentation needed for the transfer of permanent electronic records.

An example of such a list is as follows:

Email Account/Address	Position Title	Begin Date of Capture	End Date of Capture
David.Ferriero@nara.gov	Archivist of the United States	January 22, 2013	
archivistoftheunitedstates@nara.gov	Archivist of the United States	January 22, 2013	
Tom.Mills@nara.gov	Chief Operating Officer	January 22, 2013	June 1, 2013
William.Bosanko@nara.gov	Chief Operating Officer	June 2, 2013	

19. How should agencies initiate a transfer of Capstone email?

Agencies initiate legal transfer by filling out a legal transfer request in NARA’s Electronic Records Archive (ERA). For more information about creating transfer requests, please see the [ERA website](#).

ADDITIONAL QUESTIONS

20. Who may I contact if I have more questions about the applicability of this GRS?

Agencies can contact the GRS Team at GRS_Team@nara.gov.



Date: 10 July 2014
Appraiser: Sean A. Curry & Meredith L. Scheiber, ACNR
Agency: General Records Schedules (GRS)
Subject: DAA-GRS-2014-0001

DRAFT; SAC for AMR, 7/18/2014

INTRODUCTION

Schedule Overview

GRS 6.1: Email Managed Under a Capstone Approach

Additional Background Information

NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone] establishes a new means of managing email records. Final disposition is determined by the role or position of the account user, rather than the content of each individual email. This allows email to be disposed of in a more systematic way, where email within those accounts designated as permanent (or other individual emails categorized as permanent, regardless of account status) are transferred to the legal custody of the National Archives, and email within those accounts designated as temporary are eligible for eventual destruction.

This approach is one means of complying with section 1.2 of the Managing Government Records Directive (M-12-18) issued on 24 August 2012, wherein section 1.2 states, in part, that “[b]y December 31, 2016, Federal agencies must manage all email records in an electronic format.”

This GRS was developed to provide disposition authority for those agencies choosing to implement a Capstone approach and is only applicable to those agencies. Agencies using a Capstone approach, may, however, choose to deviate from this schedule by submitting their own schedule to NARA. This GRS should not be used by those agencies not using a Capstone approach to managing email. This schedule is NOT media neutral.

This GRS was developed by a team of NARA employees representing the following offices: Office of General Counsel (NGC); Agency Services, Office of the Chief Records Officer (AC); Agency Services, National Records Management Program (ACN); Agency Services, Records Management Services (ACNR); Agency Services, Records Management Policy (ACPP); Research Services, Office of the Access Coordinator, Washington, DC (RD); Research Services, Textual Records Division (RDT); Research Services,

Electronic Records Division (RDE); Research Services, Special Access/FOIA (RDF); and Research Services, Electronic Records Accessioning and Support (RDI).

A targeted focus group was held on May 16, 2014, to solicit feedback from 8 agencies on the draft document. Participation in this focus group included: Department of State; Department of Labor; Office of the Secretary, Department of the Interior; Social Security Administration; Central Intelligence Agency; Bureau of Labor Statistics, Department of Labor; Office of the Secretary of Defense, Department of Defense; and Department of the Navy, Department of Defense.

Significant focus was paid to the definition of Capstone officials (“Definition and Designation of Capstone Officials”) in order to develop a minimum list that is representative of the wide range of agencies and differing organizational structures. Focus was placed on those positions high enough within an agency to ensure that the email captured represents policy formulation, mission implementation, and other discussion of high importance within an agency. Several sources were consulted in the development of this definition, including the Government Manual, the United States Government Policy and Support Positions (PLUM) Book, a sampling of agency organization charts, a sampling of founding legislation, existing schedules for other records related to policy-making, and direct feedback from agency personnel.

An FAQ was created to supplement this GRS to aid in implementation. Included are circumstances that may prompt an agency to submit an agency-specific Capstone schedule. Agencies implementing a Capstone approach must adhere to the definitions provided in this GRS, including the definition of Capstone officials, unless seeking an exception by submission of an agency specific schedule.

Overall Recommendation

We recommend approval of this schedule.

APPRAISAL

Item 0001: [010] Email of Capstone Officials

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that remains after any culling activities for all positions listed in the “Definition and Designation of Capstone Officials.”

Proposed Disposition: Permanent

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Documents significant actions of Federal officials. Email of high-ranking officials includes details on policy development, decisions, implementation, and other mission-related documentation.
- * High potential research value.

Adequacy of Proposed Transfer Instructions: Adequate. The 15 year minimum is proposed due to the sensitive nature of most senior level email communications; the 25 years allows flexibility for instances of classified email being included, and is in line with the mandatory declassification review process.

Media Neutrality: Not approved. Records are exclusively electronic.

Item 0002: [011] Email of Non-Capstone Officials

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that remains after any culling activities and for all other positions not covered under item 0001 as provided by the “Definition and Designation of Capstone Officials.”

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate

Appraisal Justification:

- * Does not document significant actions of Federal officials. Email of senior officials, including those primarily responsible for policy formulation, will be captured in item 0001.
- * Little to no research value. The positions covered under this item are typically associated with mission implementation and other routine administrative matters within an agency, and not policy decisions.
- * Per NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone], records are still required to be filed in case files and in other recordkeeping systems when appropriate, so records of a more substantive nature will be captured elsewhere.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. The GRS sets a minimum retention band of 3 to 7 years based on feedback received during the targeted focus group. Agencies at this meeting were able to identify a large volume of accounts/positions that will contain substantially informational (FYI) email, or email related to routine business actions (such as customer service based operations, processing claims, etc.), which may be appropriate for a lower retention period. A 7 year retention may be more appropriate for other levels of staff, and is based on the standard period for bringing forth legal claims (such as those related to financial matters). Agencies may also apply a longer retention period for other levels of staff, such as middle management, as business need requires. A question on the FAQ provides some additional guidance on agency’s determining the appropriate period for email based on their own unique business and legal needs.

Media Neutrality: Not approved. Records are exclusively electronic.

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