

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

Updated August 2017

These FAQs provide additional information for agencies implementing GRS 6.1 (Capstone GRS). Agencies adopting a Capstone approach should also consult other resources available from NARA related to email management, and specifically the Capstone approach. These resources are available on NARA's [Email Management page](#), and include:

- Links to related, over-arching email and transfer related guidance;
- Recorded training sessions related to Capstone implementation best practices, determining Capstone officials, and incorporating a Capstone approach within agency policies and training programs;
- Recorded briefings on the basics of Capstone, geared towards specific audiences (managers, General Counsel, etc.);
- Checklists and recorded training sessions on the basics of Capstone; and
- Information on NARA's own implementation of a Capstone approach.

Agencies should not implement GRS 6.1 of the Capstone approach in isolation. Agencies should also supplement with agency-wide policies and training, and incorporate the schedule and its requirements into agency records management implementation tools (such as manuals and file plans (see FAQ 29).

GENERAL

1. What is the purpose of GRS 6.1?

This schedule:

- Provides disposition authority for agencies who implement a Capstone approach as outlined in [NARA Bulletin 2013-02](#): Guidance on a New Approach to Managing Email Records [Capstone]; and
- Assists agencies to meet Goal 1.2 of the [Managing Government Records Directive \(M-12-18\)](#), which requires agencies to manage both permanent and temporary email records in an accessible electronic format by December 31, 2016.

2. From whom may I request 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, no agency may implement this GRS until the agency submits a list of Capstone officials to NARA and we approve that list. This restriction applies when using item 010, and acts as an exception list when using only items 011 and 012. To submit your agency's list of Capstone officials, fill out [NARA form 1005](#) (NA-1005), *Verification for Implementing GRS 6.1*, and email it to GRS_Team@nara.gov. The form includes detailed instructions.

4. Do all agencies have to follow this GRS?

If an agency chooses to use one or more items in this GRS, it may not deviate from this schedule's parameters and must submit form NA-1005 as described in Question 3. But an 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 believes, and can justify, that it is appropriate to exclude one or more of the officials required for inclusion in item 010, Email of Capstone Officials;
- The agency needs, and can justify, a transfer date longer than the maximum in item 010; or
- The agency wants the authority to dispose of temporary email earlier than permitted by the retention periods in items 011 and 012, and can justify the shorter retention.

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

5. What does this GRS mean when using the term "official"?

In context of this GRS, an official includes all Federal agency employees, regardless of their appointment type (i.e., 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).

6. Who are the Capstone officials this GRS covers?

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

Capstone (permanent) officials are senior officials (e.g., those high on the organization chart) generally responsible for agency and program 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 senior 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 contact your [NARA Appraisal Archivist](#).

QUESTIONS RELATED TO PERMANENT EMAIL RECORDS

7. What is meant by "Cut off in accordance with agency's business needs" within the disposition instructions for item 010?

Agencies have varying business needs and Capstone implementation plans (including system considerations) that affect when they cutoff email (consider it inactive). The 'business needs' language allows agencies flexibility to develop their own cutoff instructions based on those needs. Agencies must include their cutoff instructions in the "scope" section of form NA-1005, so NARA can document agency plans and anticipate future email transfers.

This flexibility also allows agencies to block (or batch) email to reduce the number of transfers to NARA. Agencies that do not wish to transfer annually may find blocking beneficial. For example, they could transfer email in five-year blocks instead. If the first five-year block spans from 2015 through 2020, the agency would transfer the email in 2035 (15 years after the cutoff date of the most recent records). They would next transfer email in 2040, which would cover email from 2021 through 2025. And so on.

Acceptable cutoff instructions for an agency include, but are not limited to:

- 1) Cut off at the end of the calendar year;
- 2) Cut off at the end of tenure;
- 3) Cut off at the end of each presidential administration; or
- 4) Cut off in five-year blocks at the end of the calendar year of the most recent email (for example, email from 2015 through 2020 would be cutoff in 2020 and transferred in 2035; email from 2021 through 2025 would be cutoff in 2025 and transferred in 2040).

As a reminder, all Federal agencies must manage permanent and temporary email records in an electronic format with the capability to identify, retrieve, and use the records for as long as their disposition requires.

8. What is meant by "Transfer to NARA 15-25 years after cutoff, or after declassification review (when applicable), whichever is later" within the disposition instructions for item 010?

Agencies have varying business needs and missions that affect when they should transfer permanent email to the legal custody of NARA. This language allows agencies flexibility to determine the appropriate transfer time, within the range of 15 to 25 years, after cutoff or after declassification review (if applicable). As with the cutoff instructions (see FAQ 7), agencies must include their transfer time in the "scope" section of form NA-1005, so NARA can document agency plans and anticipate future email transfers.

Agencies should carefully consider their transfer date. Agencies with a high level of deliberative or sensitive email may consider a later transfer date (for example, 25 years), while others without these

concerns should consider an earlier transfer date (for example, 15 years). As a reminder, all Federal agencies must manage permanent and temporary email records in an electronic format with the capability to identify, retrieve, and use the records for as long as their disposition requires. The later the transfer date, the longer the agency maintains this responsibility.

The transfer date should be determined in conjunction with the cutoff instructions (see FAQ 7), 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	Email from calendar year 2015 would be transferred in 2030
At the end of tenure	To NARA 25 years after cutoff	Email from individuals whose tenure ended in 2015 would be transferred in 2040
At the end of each Presidential administration	To NARA 20 years after cutoff	Email from the 2017 to 2020 administration would be transferred in 2040
At the end of calendar year	To NARA in 15 years in 5 year blocks	Email from 2015 through 2020 would be transferred in 2035; email from 2021 through 2025 would be transferred in 2040
At end of tenure	To NARA in 5 year blocks 15 years after cutoff	Email from individuals whose tenure ended in 2015 through 2020 would be transferred in 2035; email from individuals whose tenure ended in 2021 through 2025 would be transferred in 2040

Agencies with classified email have less flexibility with transfer time frames. As with any classified permanent records, email must be reviewed prior to transfer to NARA. Classified email is typically reviewed at 25 years based on standing Executive Orders.

9. What specific positions are included in category 7, 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 (e.g., 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.

10. 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 predominately 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 (non-senior) 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.

11. Does the GRS apply if Capstone officials have 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 titles (*e.g.*, 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. See category four within item 010.

You can find additional information on designating Capstone officials and email accounts in [NARA Bulletin 2013-03](#), Guidance for agency employees on the management of Federal records, including email accounts, and the protection of Federal records from unauthorized removal.

12. Must agencies maintain a list of Capstone officials and their associated email addresses?

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 email. Agencies should consider managing and keeping up-to-date a list of Capstone officials and their associated email addresses as part of agency policy (one of NARA’s recommended best practices). See also FAQ 36.

QUESTIONS RELATED TO TEMPORARY EMAIL RECORDS

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

Item 011 covers all roles that do not fit into the descriptions of either 010 or 012. This item is therefore appropriate for non-senior 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 work flow and methods; budgeting and financial oversight; and completing other mission-related tasks. See also FAQs 14 and 15. The majority of temporary email 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.

14. 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. See also FAQs 13 and 15.

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

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. This should include determining if the agency is subject to inspection, audit, legal, and other regulatory requirements that require a longer agency email retention period to meet certain obligations. Ultimately, the agency will document and disseminate the retention period via agency policy and implementation tools. See FAQ 29.

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 accounts contents longer based on business and legal needs.

Agencies may determine that using only item 011 as one agency-wide retention period for all temporary email may better meet its business and legal needs and may be easier to implement. For example, an agency may decide that it should maintain all temporary accounts for seven years, regardless of the role or position of the person whose account they're in. Agencies choosing to use only item 011 for all temporary email may also maintain accounts longer for business needs (e.g., 15 years) without requesting additional authority from NARA. See also FAQs 11, 14, and 29.

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

NARA believes that seven years is a reasonable and appropriate baseline retention period for temporary email records, not only to meet agency business needs, but also to ensure we adequately and properly document 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 FAQ 15 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 13 for additional information.

QUESTIONS ABOUT IMPLEMENTATION

17. May an agency implement portions of this GRS?

Yes, an agency may use any or all of the items on this GRS. 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 using only item 011 or 012 may not dispose of the email of any official listed in item 010, Email 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 within their overall Capstone approach later.

As indicated in the “GRS Scope” section of the Capstone GRS introduction, an agency may choose to exclude several categories of email from its Capstone program. The agency must ensure that it covers any email it excludes from the Capstone program under another NARA-approved schedule or authority before it may dispose of the email. See also FAQ 29.

18. Does this GRS apply to classified email accounts?

Yes. This GRS applies to all email, 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 accounts would have both included under item 010 of this GRS.

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.

19. How is legacy email defined for GRS 6.1?

Legacy email is email that still exists in an electronic format, whether part of a temporary or a permanent account, at the time of Capstone implementation. It 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.

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

We expect an agency using this GRS to apply the items the agency uses to all legacy (existing) email. Agencies should summarize the extent of their legacy email on form NA-1005. For example, an agency might state that no legacy email exists for the agency, as the agency used traditional records management with a print-and-file policy prior to adopting Capstone, or that the agency has legacy email back to a certain date. NARA acknowledges that legacy email may be incomplete, or that position titles

may have changed over time. In cases of title changes, the agency may apply GRS items to equivalent positions.

21. 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."

22. Can other disposition authorities be used to dispose of email prior to using the authorities within GRS 6.1?

Yes, with exceptions depending on the status of the email as described below, and for readable email only (see FAQ 23). Generally speaking, for legacy email most agencies will find applying items from GRS 6.1 to entire bodies of email as less burdensome than applying other valid authorities on an email-by-email basis. Agencies should address this in agency records management policy. See FAQs 3 and 29.

A. For all items on GRS 6.1, day-forward (start of Capstone implementation):

Yes. Agencies may apply other approved disposition authorities to temporary and permanent email prior to applying the disposition authorities within GRS 6.1 for day-forward email (start of Capstone implementation, generally the date approved on the agency's first form NA-1005). This could either be part of culling strategies used within an agency, and/or implementation of a Capstone approach that still utilizes some level of traditional records management. 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 (please note that this item cannot be used for **permanent legacy email** per question 22.C. below);
- GRS 5.2, item 010, which authorizes the deletion of transitory records; and/or
- Other NARA approved, media neutral, agency specific disposition authorities. See other FAQ questions under 'Culling' section.

B. For temporary legacy email, items 011 and 012:

Yes. Agencies may apply other approved disposition authorities to legacy email (similar to section A above) prior to applying the disposition authorities within GRS 6.1.

Agencies can 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.

Agencies not able to do this, or unable to ascertain if other approved disposition authorities were adequately applied to legacy email, must apply the authority from the appropriate item on GRS 6.1 at the account level for the minimum retention defined by either item 011 or item 012.

C. For permanent legacy email, item 010:

Yes, with limitations. Agencies may cull personal email (email not affiliated with official government business), clearly transitory email records (GRS 5.2, item 010), and nonrecord material. Agencies may also cull temporary records using any NARA approved media neutral disposition authority, excluding GRS 5.1, item 020. GRS 5.1, item 020 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). However, if culling records using an agency specific authority, the records must be kept according to the retention of that authority. NARA acknowledges that this may result in duplicate permanent records being transferred. Since print-and-file and cross-filing policies were not consistently followed, or compliance with these policies is often difficult to validate, this ensures that permanently valuable emails are transferred to the National Archives.

23. 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 and to transfer permanent email records into the National Archives (i.e., for their NARA-approved retention period). 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, as well as the Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18). Email that is not retrievable and usable is, therefore, not readable.

24. What do I do if I have legacy email that is not readable?

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

25. What if the status of legacy email 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 email scope, and how legacy email 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 email.

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 email. We believe it dates back to approximately 2003. We will report our full finding 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”.

26. Does use of Capstone and this GRS negate DOD 5015.2?

If your agency is part of the Department of Defense, and thus governed by DOD Directive 5015.2 and the accompanying DOD 5015.2 Standard for Records Management Applications, you should work within DOD to determine how Capstone may be implemented. Non DOD agencies are not governed by the 5015.2 directive or standard, and NARA does not require any agency to have 5015.2 compliant applications.

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

Although we designed the Capstone approach for managing 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 agency can include the other records under the Capstone GRS. Inclusion of these records with email accounts should be noted on the NA-1005 in the scope field. However, when the agency manages these other records separately from email, the agency must have a NARA-approved disposition authority for Capstone officials (those whose email is permanent). GRS 5.1, item 010, covers calendars of non-Capstone officials. Chats, however, must be scheduled for both Capstone and non-Capstone officials.

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

Capstone can reduce the burden on individual end-users by encouraging greater use of automated methods for managing email accounts. Agencies must manage their records in accordance with NARA regulations and fulfill the requirements of the Managing Government Records Directive. When using the Capstone approach for capturing and managing email, agencies must:

Consider whether email records and attachments can or should be associated with related records under agency guidance. 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. 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. (NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records, item 5d.)

29. 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 guidance that does not require NARA approval. For example, this could include:

- Clearly defining the retention period for temporary email 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 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 of Capstone Officials, (for example, those positions and officials specific to your agency). NA-1005 is a tool for this;
- Providing additional policy on how to handle email of officials in an acting position;
- Providing policy on managing nonrecord email;

- Developing policy on when other disposition authorities related to email 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 (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.

QUESTIONS ABOUT CULLING

30. 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 (e.g., email blasts (such as agency-wide communications), spam, and personal email (records belonging to an individual and not related to agency business)), and transitory email 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.

31. Do you expect agencies and users to cull Capstone email accounts?

Yes, especially for permanent accounts, in order to minimize the amount of non-record and personal emails agencies transfer to the National Archives. Since agencies are most familiar with the content of their email 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 email, 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).

32. What if an agency can't cull email?

An agency should review its policies and technology to determine and verify its culling capabilities. Some technologies may not allow culling as described above. Agencies may still implement Capstone for permanent accounts without culling, but this will result in the agency transferring to NARA emails that do 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.

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

Since agencies are most familiar with the content of their email records, we expect them to cull non-record material to the extent possible before transferring. 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.

QUESTIONS ABOUT TRANSFER

34. How should agencies transfer email to NARA?

You should transfer email, like any other electronic records, in accordance with current NARA transfer guidelines. You can find up-to-date guidelines on NARA's accessioning website at <http://www.archives.gov/records-mgmt/accessioning/electronic.html>.

35. Will NARA accept encrypted email?

No. As outlined in [NARA Bulletin 2014-04](#), Revised 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.

36. What documentation must an agency submit when it transfers Capstone email?

See [NARA Bulletin 2014-04](#), Revised 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. See FAQ 12.

Agencies must transfer to NARA the email of Capstone officials captured during their tenure as Capstone officials. Therefore, agencies should treat email of a Capstone official created prior to when the agency designated that person as a Capstone official (e.g., prior to their promotion/rotation into a Capstone position) as temporary and should not transfer that previous email to NARA. 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:

<i>Position title</i>	<i>Email Account/Address</i>	<i>Begin Date of Capture</i>	<i>End Date of Capture</i>
Secretary of [Department]	Senior.Official@agency.gov	January 22, 2013	
Secretary of [Department]	Secretary@agency.gov	January 22, 2013	
Chief Operating Officer	John.Doe@agency.gov	January 22, 2013	June 1, 2013
Chief Operating Officer	Jane.Public@agency.gov	June 2, 2013	

Documentation for legacy email 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.

37. How will NARA screen permanent email containing controlled unclassified information for public access?

Generally, Federal agency emails will not be transferred to us until they are between [15 and 25 years old](#). See FAQ 8 for information on how to calculate transfer dates. When an agency initiates a [transfer](#) of permanent email, the Agency Records Officer must indicate any [FOIA](#) exemptions that might apply on the request to transfer records to 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.