

NARA Bulletin 20XX-XX

TO: Heads of Federal Agencies

SUBJECT: Resubmission of Capstone Forms

EXPIRATION DATE: Expires when revoked or superseded

1. What is the purpose of this Bulletin?

This bulletin explains the requirements for resubmitting form NA-1005, Verification for Implementing General Records Schedule (GRS) 6.1, Email Managed Under a Capstone Approach. This bulletin supplements NARA Bulletin [2013-02, Guidance on a New Approach to Managing Email Records](#) as well as the [GRS 6.1](#) and its accompanying [FAQ](#). Agencies not currently using a Capstone approach should refer to Bulletin 2013-02, GRS 6.1, and the FAQ.

2. Is resubmission of the form NA-1005 required?

Yes. NARA requires agencies that have an approved form NA-1005 to periodically update and resubmit in accordance with this bulletin. An agency's approved form NA-1005 is a snapshot into that agency's organization at the time of form approval. Since it is common for agencies to reorganize, all Federal agencies are responsible for ensuring that all form NA-1005 submissions are reflective of current agency organization pursuant to 36 CFR 1224.10(c). If agencies do not resubmit as required, they may manage disposition based on an inaccurate form. Using inaccurate forms puts the agency at risk of an unauthorized disposal under 36 C.F.R. Part 1230.

3. Is NARA's approval of the resubmitted form NA-1005 required?

Yes. The agency may not implement the resubmitted form NA-1005 until notified by NARA that the form has been approved.

4. What are the types of resubmission?

There are **three types** of resubmission:

1. a mandatory government-wide resubmission cycle, every four years, for agencies using GRS 6.1 for disposition of email records

2. an agency-initiated ad hoc resubmission, for changes that need to be documented outside the mandatory cycles.
3. a NARA-initiated ad hoc resubmission based on results of a NARA inspection and/or agency reporting.

5. What is government-wide resubmission?

Agencies who are using GRS 6.1 are required to resubmit a form NA -1005 every four years. The first mandatory resubmission cycle will be due in January 2023, with the next in January 2027.

NARA will notify agencies of resubmission due dates several months before the forms are due.

All existing, previously approved form NA-1005 submissions will expire upon NARA approval of the new form.

Agencies are required to resubmit new form NA-1005s even if there have been no changes from the previously approved form. The resubmission process allows NARA to certify that no changes are necessary in accordance with NARA's oversight responsibilities.

6. What is an agency-initiated ad hoc resubmission?

An agency may propose an updated submission of a form NA-1005 outside the mandatory resubmission process at any time. NARA reserves the right to instruct the agency to await the regular resubmission process. Agencies that would be met with an administrative burden in delaying resubmission may discuss ad hoc resubmission with their NARA appraisal archivist.

Agencies should refer to the "Table of Resubmission Scenarios" below when considering an ad hoc resubmission.

7. What is a NARA-initiated ad hoc resubmission?

NARA may request that an agency resubmit a form NA-1005 outside the mandatory resubmission process at any time due to identification of organizational changes that affect the form. This may occur, for example, after a NARA inspection or audit, or based on an agency's self-reporting data.

Agencies should refer to the “Table of Resubmission Scenarios” below to see the type of scenarios that may warrant a NARA-initiated ad hoc resubmission.

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

Agencies must follow the requirements for transfer documentation, pursuant to the GRS 6.1 [FAQs](#). Agencies may be required to respond to Capstone and GRS 6.1 related questions on annual reports, as appropriate.

9. Where can I find the NA-1005 form?

The form is available on the GRS webpage, next to GRS 6.1. See <https://www.archives.gov/records-mgmt/grs.html>

10. Whom should I contact for more information?

For additional information, please contact the appraisal archivist assigned to work with your agency. See <https://www.archives.gov/records-mgmt/appraisal/work-group-all.html> for a list of appraisal archivists.

Table of Resubmission Scenarios

If your agency has a scenario not reflected below, and is unsure whether or not resubmission is warranted, please contact your agency’s assigned NARA appraisal archivist.

Scenario	Example	Resubmit	Action
<p>MAJOR AGENCY REORGANIZATION: The agency goes through a major reorganization in between mandatory resubmission dates that affects the form NA-1005.</p>	<p>It is two years before the next mandatory resubmission deadline, and the agency goes through a major reorganization, such as gaining or losing large components or program offices. The reorganization will result in the current form NA-1005 having changes across at least 3 categories as defined by the GRS 6.1.</p>	<p>Yes</p>	<p>Submit a new form NA-1005 for NARA review and approval, if the mandatory resubmission date is more than 1 year away. NOTE: This will not eliminate the requirement to resubmit when the government-wide resubmission occurs.</p>
<p>AS A RESULT OF NARA INSPECTION OR SYSTEM AUDIT: During an agency inspection or system audit NARA identifies inaccuracies on the current approved form</p>	<p>After a NARA inspection of the agency, it is determined that the current form NA-1005 does not adequately reflect the organization of the agency, or</p>	<p>Yes</p>	<p>Submit a new form NA-1005 for NARA review and approval, if the mandatory resubmission date is more than 1 year away. NOTE: This will not eliminate the requirement to resubmit</p>

NA-1005.	otherwise requires changes. In these cases, the resubmission request may be triggered by NARA.		when the government-wide resubmission occurs.
SCOPE CHANGE: One of the scope fields on the form needs to be updated.	The agency reported that they had legacy email back to 2010, but has since determined they actually have some back to 2008.	No	Await mandatory resubmission as and update the scope statement(s) at that time. In the meantime, manage the email according to item disposition instructions.
CUTOFF or TRANSFER STATEMENT CHANGE: The agency wants to change the cutoff and/or transfer instructions.	The approved cutoff instructions read "cutoff at the end of employee tenure," but the agency wants to change them to read "cutoff annually."	No	Await mandatory resubmission and update the statement(s) at that time. In the meantime, manage the email according to the currently approved language.
MINOR AGENCY REORGANIZATION: The agency goes through a minor reorganization that has little to no effect on the form NA-1005 in between mandatory resubmission dates. NOTE: the scenarios below may also relate to a minor reorganization.	It is two years before the next mandatory resubmission deadline, and the agency goes through a minor reorganization, such as one or two offices reorganizing. The reorganization will not lead to the current form NA-1005 requiring changes in more than 2 categories as	No	Await mandatory resubmission and maintain all email for affected positions as permanent. Document title changes on required documentation, pursuant to GRS 6.1 FAQs.

	defined by the GRS 6.1		
<p>POSITION TITLE CHANGE: A title for an approved permanent position has changed, but the nature of the work has not.</p>	<p>The position of “Director of Public Affairs” on the approved form NA-1005 has changed to “Director of Communications, Outreach, and Public Affairs,” but the duties remain generally the same.</p>	No	<p>Await mandatory resubmission and propose changes at that time. Document title changes on required documentation, pursuant to GRS 6.1 FAQs.</p>
<p>POSITION ACCOUNT NUMBER CHANGE: The number of accounts assigned to a permanent position changes.</p>	<p>The head of the agency had one email account at the time the form NA-1005 was approved. Since then, they have increased to 2 email accounts with the addition of an alias account.</p>	No	<p>Await mandatory resubmission and propose changes at that time. Pursuant to the GRS 6.1, FAQs , all accounts of Capstone officials must be managed as permanent. This should also be included on required documentation, pursuant to GRS 6.1 FAQs.</p>

<p>POSITION ELIMINATED: A position approved on the form NA-1005 has been discontinued, and no longer exists within the organization.</p>	<p>Two of the department's Under-Secretary positions were approved as permanent on the current form NA-1005. Their duties, however, were since merged, and one of the two positions has been removed from the organization.</p>	<p>No</p>	<p>Await mandatory resubmission and propose changes at that time. Document end date of position on required documentation, pursuant to GRS 6.1 FAQs. Extant email of the discontinued position is still to be managed as permanent under the previously approved form NA-1005.</p>
<p>POSITION CREATED: A new position is created within the agency that meets the definition of one of the 10 categories within item 010 of the GRS 6.1.</p>	<p>The department adds an additional, new Under-Secretary position to oversee a new program mission.</p>	<p>No</p>	<p>Await mandatory resubmission and propose changes at that time. Treat the email records as unscheduled (permanent) until the new form NA-1005 is submitted and approved.</p>
<p>POSITION STATUS CHANGE, NO LONGER PERMANENT: The agency feels that a position approved for permanent retention is no longer appropriate for permanent retention.</p>	<p>The manager of a specific program office was approved for inclusion in category 6, but the agency feels that the substantive decisions for that office are already captured in email of higher officials.</p>	<p>No</p>	<p>Await mandatory resubmission and propose changes at that time. In the meantime, the email must be managed as permanent as approved on the existing form NA-1005.</p>

<p>POSITION STATUS CHANGE, NOW PERMANENT: The agency feels that a position NOT approved for permanent retention is appropriate for permanent retention.</p>	<p>In the previous submission, an agency did not identify a Capstone position, but has subsequently determined that the position matches one of the ten Capstone category definitions on the GRS 6.1, item 010.</p>	<p>No</p>	<p>Await mandatory resubmission as outlined in section A and propose changes at that time. Treat the email records as unscheduled (permanent) until the new form NA-1005 is submitted and approved.</p>
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