

- 1  **Capstone: A New Approach to Managing Email Records.**
AGENCY WORKSHOP.
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION.
OFFICE OF THE CHIEF RECORDS OFFICER.
OCTOBER 30, 2013.
- 2  **Section 1: Introduction and Welcome.**
- 3  **Capstone: Agenda.**
 - 1 Section 1: Introduction and Welcome.
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- 4  **Section 2: New Approach to Managing Email Records.**

Current Situation.

Very few agencies manage their email records electronically.
Most agencies rely on a print-and-file strategy for email.
Several agencies are already capturing and storing emails in some type of repository, even if not for recordkeeping purposes.

Use of some D O D fifty fifteen point 2 certified systems can be no less burdensome than "print and file" because they may still require employees to "click and file" individual email.
Loss of permanent electronic email.
- 5  **Section 2: New Approach to Managing Email Records, slide 2.**

The Challenge.

All Federal email must be managed in accordance with the Federal Records Act.
Traditionally, user intervention is necessary to ensure that email records are retained for as long as required.

Volume of email has made compliance difficult.
Of greatest concern to Naara is ensuring that email records appraised as permanent are preserved by agencies and transferred to Naara.
Agencies also have an interest in ensuring that email is maintained for a sufficient period of time to conduct their business.
- 6  **Section 2: New Approach to Managing Email Records, slide 3.**

Managing Government Records Directive.
Managing Government Records Directive, Goal 1 point 2, requires agencies to manage all email electronically by December 31, 2016.
Directive Action A2 requires Naara to create new email guidance:
"By December 31, 2013, Naara will issue new guidance that describes methods for managing, disposing, and transferring email."
- 7  **Section 2: New Approach to Managing Email Records, slide 4.**

Solution—Capstone Concept.

Reduce the use of item by item filing to make email management easier for end users.
Manage email records at the account level.
Leverage the agency's existing technology rather than requiring the purchase and use of specific technology.
Allow for the disposition of clearly temporary accounts, while identifying and capturing permanently valuable email accounts.

- 8  **Capstone Accounts Example.**
- 9  **Section 2: New Approach to Managing Email Records, slide 5.**
Capstone Bulletin Overview.
Capstone is not a software application, it is an approach.
Capstone provides an additional option for managing email records.
Capstone is not mandatory.
- 10  **Section 2: New Approach to Managing Email Records, slide 6**
Capstone Bulletin—Overview.
Capstone is flexible, and allows for various implementation approaches.
Allows for the systematic transfer of email accounts scheduled as permanent.
Allows for the systematic disposal of entire email accounts scheduled as temporary.
- 11  **Section 2: New Approach to Managing Email Records, slide 7.**
Capstone Bulletin Overview, Continued.
Agencies may remove transitory, nonrecord, and/or personal messages.
Emails can be managed at the account level, rather than on an individual message basis.
Work of the end-user determines status of the account.
- 12  **Section 2: New Approach to Managing Email Records, slide 8.**
1. What is the Purpose of this bulletin?
Lays out Naara's new approach to managing email and its relationship to:
Presidential Memorandum on Managing Government Records.
and
OMB/Naara M-12-18 Managing Government Records Directive.
- 13  **Section 2: New Approach to Managing Email Records, slide 10**
2. What is the Capstone approach?
Simplified approach to email management based on work or position of account holder.
Capstone accounts are scheduled as permanent.
Other accounts may be scheduled as temporary.
Agencies may remove transitory, nonrecord, and/or personal messages depending on their needs.
- 14  **Section 2: New Approach to Managing Email Records, slide 11.**
3. What are the benefits of the Capstone approach?
A Capstone approach may:
Provide a practical approach to managing legacy email accounts.
Cut down on print and file and related approaches.
Capture permanent email for transfer to Naara in an electronic format.
Leverage existing technologies in order to help agencies meet Goals 1.1 and 1.2 of the Directive; agencies will manage all permanent electronic records in an electronic format by 2019 and manage all email electronically by 2016.
- 15  **Section 2: New Approach to Managing Email Records, slide 12.**
4. What should an agency consider before deciding to use the Capstone approach?
Bulletin provides a list of questions.
If an agency decides to use a Capstone approach; agencies must:
Determine which accounts they want to designate as permanent and schedule or apply existing authorities accordingly.
Agencies are encouraged to consult with their Naara Appraisal Archivists to determine the appropriate strategy for managing email records created in their agency.
- 16  **Section 2: New Approach to Managing Email Records, slide 13.**
5. Does Capstone change agencies' recordkeeping responsibilities?
The approach can reduce the burden on end-users.
Agencies still must:
Schedule records.
Protect integrity and authenticity.

Maintain access and usability.
Determine if email records should be filed with related records.
Capture and maintain metadata.

17  **Section 2: New Approach to Managing Email Records, slide 14.**

6. How do agencies identify Capstone email accounts?
Based on agency business processes that create or receive permanently valuable email.
Does not have to be limited to high-level agency officials.
Bulletin includes a list of possible officials, suggests use of the "Plum Book," "U.S. Government Manual," but does not require either.

18  **Section 2: New Approach to Managing Email Records, slide 15.**

7. Must agencies use a specific technology to implement Capstone?
Capstone implementation is NOT dependent on a specific technology.
Agencies may leverage existing technologies, including current email applications.
Agencies must have policies, procedures, and training to fully implement Capstone.

19  **Section 2: New Approach to Managing Email Records, slide 16.**

8. How does Naara's Pre-accessioning policy apply to Capstone?
Pre-accessioning is encouraged for all permanent electronic records, including email accounts captured using a Capstone approach.

20  **Section 2: New Approach to Managing Email Records, slide 17.**

9. What other Naara resources are available?
Provides a list of references for our agency customers; especially:
Records Express: The official blog of the Office of the Chief Records Officer at Naara.
Toolkit for Managing Electronic Records.

21  **Section 2: New Approach to Managing Email Records, slide 18.**

10. Whom should I contact for more information?
The agency's Naara Appraisal Archivist (see Bulletin for further information).

22  **Section 3: Where to Start.**

Each Agency should:
Begin discussing if Capstone is right for them, especially in regards to M-12-18, section 1.2; agencies will manage all email in an electronic format by December 31, 2016.
Determine the resources and tools available to assist with Capstone approach decision-making.
Determine the stake-holders needed for Capstone discussions and decisions.

23  **Section 3: Where to Start. Slide 2.**

Assess and evaluate your agency's current email management:
What are your Agency's email management practices and policies?
What is your email platform and storage capacity?
What records management challenges has your Agency experienced?
Other factors:
Legal issues.
Classified email.
Future IT and budget resources.

24  **Section 3: Where to Start, slide 3.**

Does your Agency's current email solution meet the requirements of M-12-18, section 1.2; all emails are managed in an electronic format?
Is it meeting other agency business needs and requirements?
Can Capstone help?

25  **Section 3: Where to Start, slide 4.**

Get the right people involved in the conversation...
Senior Agency Official (SAO) for Records Management.
Agency Records Officer.
Departmental Records Officer, if applicable.

Chief Information Officer / IT Staff.
General Counsel.
FOIA Office Representative.
Privacy Program Representative.
Naara Appraisal Archivist.
Other stakeholders, e.g. procurement staff.

26  **Section 3: Where to Start, slide 5.**

The stakeholders should be informed on the Capstone approach and its offerings, so they can assist with:

- Current program assessment.
- Discussion of an appropriate implementation approach for your Agency.
- Decisions/designing of the Agency's Capstone approach implementation plan .
- Identifying available technologies/tools/resources.

27  **Section 4: Legal Considerations.**

Call your lawyer!

28  **Section 4: Legal Considerations, slide 2.**

What will the attorneys be worried about?
Everything.

29  **Section 4: Legal Considerations, slide 3.**

What is likely to be their biggest worry?
Whether the agency designated a sufficient number of Capstone officials to ensure adequate preservation of permanent records.
How the agency is implementing the Capstone approach for temporary accounts.
Documenting the decision-making process for implementing Capstone, including designation of Capstone account holders, is the best defense against a charge of arbitrariness.

30  **Section 4: Legal Considerations, slide 4.**

Other common legal concerns:

- What group of records will be deleted that would have otherwise been preserved?
 - Will that affect agency obligations with regard to:
 - Litigation.
 - Regulation.
 - Public policy.

- What records will now be available that weren't before?
 - Does that present a new risk to the agency for:
 - Litigation.
 - Access requests.
 - Preservation obligations.

31  **Section 4: Legal Considerations, slide 5.**

Key legal implementation questions:

- How will the agency be able to execute a litigation hold under a Capstone framework?
 - The answer is dependent upon your agency's technology.
 - The focus of this question is on temporary records that would have been otherwise destroyed.

- How will the agency be able to search the records it is now keeping?
 - And, what about export?

- This matters for both e-discovery and Freedom of Information Act requests.
- What is the plan for destroying temporary records and nonrecords?
 - Defensible deletion.

32  **Section 5: Capstone Approach Scope.**

Capstone Approach Points Recap:

- Capstone is a method, a high-level concept; it is not a software package or specific tool.
- The approach allows email to be managed as a record series.

There is no “one size fits all” when it comes to Capstone implementation. Agencies may develop different implementation approaches that work best for their business and legal needs.

33  **Section 5: Capstone Approach Scope, slide 2**

The bulletin allows for flexibility, giving Agencies the freedom to:

- Decide the suitability of implementing a Capstone approach.
- Design an approach that best fits the needs of the Agency.
- Determine what scope (level of implementation) is best.

34  **Section 5: Capstone Approach Scope, slide 3**

Remember:

The goal is to become compliant with M-12-18, section 1.2, managing all emails in an electronic format by December 31, 2016 ... the broader your Capstone implementation (organizationally), the more likely this is to occur.

If an Agency opts to not use Capstone, they must still meet the requirements of M-12-18, section 1.2.

35  **Section 5: Capstone Approach Scope, slide 4**

Scope of your Capstone Approach.

Decision 1.

- Approach applies to the entire agency.
- Approach applies to only specific offices and/or regions.

Decision 2.

- Approach applies to legacy email accounts.
- Approach applies to day-forward email accounts.
- Approach applies to a specific email platform or email archiving solution.
- Approach applies to legacy, specific email platform or email archiving solution and day-forward email accounts.

36  **Section 5: Capstone Approach Scope, slide 5.**

Ramifications:

Limiting Capstone to day-forward email only: Then an agency must use alternate processes for the management of legacy email.

Limiting Capstone to legacy email only: Then an agency must use alternate processes for the management of day-forward email.

Limiting Capstone to specific offices or regions: Then multiple email approaches must be maintained and managed.

An agency must make scope decisions carefully.

37  **Section 5: Capstone Approach Scope, slide 6**

Naara suggests that you consider the largest scope possible.

- Approach applies to the entire agency.
- Approach applies to both legacy and day-forward email accounts.

38  **Section 6: Implementation Factors.**

Implementation Factors include:

- Technology.
- Policy.
- Training and Awareness.
- Stakeholder Input.

39  **Section 6: Implementation Factors.**

Technology

Review Current IT capabilities, including email systems, email archives, etc.

Can the agency:

- Identify separate accounts by user or office.
- Update account information when staff changes.
- Separate/flag permanent and temporary accounts.

Dispose of temporary accounts.

Transfer permanent accounts to Naara.

Consider which system capabilities can be automated and if any must be done manually.

40  **Section 6: Implementation Factors, slide 2.**

Policy.

Agencies may need to create and issue policies for their Capstone approach.

How much oversight is needed?

Will agency allow staff to cull transitory, personal, and/or nonrecords?

When will the permanent accounts be captured for preservation?

What are current agency policies on personal use of agency email accounts?

What are current agency policies on use of personal accounts to conduct agency business?

41  **Section 6: Implementation Factors, slide 3.**

Training and Awareness.

The level of training required varies depending on your agency's Capstone approach.

Users need to be trained on how to implement the agency's Capstone approach.

Personal use of email.

Agency email management policies.

IT and RM may require additional training.

42  **Section 6: Implementation Factors, slide 4.**

Stakeholder Input.

Keep all your stakeholders involved throughout planning and implementation.

43  **Section 7: Specific Records Management Considerations.**

Cross-filing/Linking of Email:

Using electronic pointers (such as metadata tags) to establish linkages.

In select cases, filing with associated paper or electronic case or project files.

End-user Roles:

Your agency's Capstone approach could completely remove the user from making records management decisions, or still allow for a level of user involvement that meets the business and legal needs of the agency.

Remember ... Capstone allows for flexibility.

44  **Section 7: Specific Records Management Considerations, slide 2.**

Culling:

Culling is any activity, whether automated or manual, that removes nonrecord and/or transitory material from an email account.

Culling is encouraged by Naara, especially when automated, to reduce capture of nonrecord and transitory material.

Agencies must not remove email that is considered a record, unless it is filed elsewhere.

Culling should enhance the accessibility and usefulness of the complete record.

45  **Section 7: Specific Records Management Considerations, slide 3.**

Culling Options:

Automated: activities that do not require end-user action.

De-duplication tools (for example, automated detection of email blasts)

Nonrecord categorization (for example, emails from a specific domain, such as a ListServ, are identified as nonrecord).

Other rules that assist with email categorization.

Manual: activities that do require end-user action.

A period of time ("safe harbor") allowing users to manually make record/nonrecord categorization decisions before capture.

Both Automated and Manual.

No Culling.

46  **Section 7: Specific Records Management Considerations, slide 4.**

Without culling an Agency is accepting:

All content, including personal, in email accounts will be treated as record.

All content in email accounts designated as permanent will be transferred to Naara.

Even accepting this, a Capstone approach will likely lead to much better management of email!

47  **Section 8: Designating Accounts.**

Capstone relies on identifying entire accounts as either permanent or temporary.

Disposition will be based on account owner's role in the agency.

The agency will identify those accounts that will be captured as permanent.

There are resources and tools that can assist with this decision-making process.

48  **Section 8: Designating Accounts.**

Permanent Accounts.

Senior officials may be the best place to start.

Heads of departments and independent agencies and their deputies and assistants.

Heads of program offices and staff offices including assistant secretaries, administrators, and commissioners.

Directors of offices, bureaus, or equivalent.

Principal regional officials.

Political appointees, and officers of the Armed Forces serving in equivalent or comparable positions (Flag Officers).

Staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants.

49  **Section 8: Designating Accounts, slide 2.**

Senior officials are identified in:

The Federal Government Plum Book.

The US Government Manual.

An agency's Organizational Chart.

An agency's Delegations of Authority.

An agency's Orders of Succession.

...or however your agency defines its senior officials.

50  **An illustration of Capstone Officials at Naara, using the U.S. Gov't Manual, Plum Book, Naara organizational chart, and Naara delegation of authorities.**

51  **Section 8: Designating Accounts, slide 3.**

Permanent Accounts.

Agencies should not stop at "senior" officials when identifying permanent accounts. An agency should look at its lines of business:

Accounts from offices that routinely create permanent records.

Accounts from offices that formulate and/or implement policy.

Accounts associated to certain programs or initiatives, rather than a person.

All accounts used by or on behalf of Capstone officials must be included (e.g., alias accounts, classified accounts, etc.).

Accounts and their use may change over time and should be evaluated on a recurring basis.

52  **Section 8: Designating Accounts, slide 4.**

Temporary Accounts.

Agencies including temporary accounts in their Capstone approach have additional decisions to make.

To ensure proper decisions are made for temporary accounts, all stakeholders should be involved in the process.

53  **Section 8: Designating Accounts, slide 5.**

Temporary Accounts.

One retention length may be appropriate for all remaining email accounts -- the one bucket approach for temporary accounts.

Multiple retention lengths may be appropriate -- the multiple bucket approach for temporary accounts.

For example, one retention length for “middle management”: temporary email accounts and one for everyone else’s temporary email accounts.

An agency should consider its business and legal needs when having these discussions.

54  **Section 8: Designating Accounts, slide 6.**

Scenario, where an agency has:

- Decided to implement a Capstone Approach.

- Identified their permanent Capstone accounts.

- Included temporary accounts in their Capstone approach.

- Identified that temporary email accounts fall into a 3 to 15 year retention band.

- Considered all concerns of the appropriate stakeholders.

Therefore, the agency proposes disposition as:

- Bucket One: all permanent (Capstone) accounts. Transfer to Naara.

- Bucket Two: all temporary (non-Capstone) accounts. Destroy at 15 years.

55  **Section 9: Disposition Authority.**

Records managed under a Capstone approach require a Capstone-specific disposition authority.

Naara is considering the viability of a General Records Schedule (GRS) for the Capstone approach.

If a GRS is not available or applicable to your agency, Naara will work with you to develop schedules when necessary.

56  **Section 10: Tools & Resources.**

Naara is considering additional tools to assist you, such as:

- Technical requirements check-list.

- “Lessons learned” presentations from agencies who have implemented Capstone.

Other related resources:

- Naara’s forthcoming format guidance will include a section about email.

- Naara’s guidelines for pre-accessioning.

- Naara’s Records Management Pages on Archives dot gov.

57  **Section 11: Questions and Answers.**