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# White Paper on The Capstone Approach and Capstone GRS

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National Archives and Records Administration  
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## EXECUTIVE SUMMARY

This white paper helps explain the process and decisions leading to the development of a General Records Schedule (GRS) for Email Managed under a Capstone Approach, as well as providing additional contextual information and detail not included in the typical appraisal report. The Capstone Approach offers agencies the option of using a more simplified and automated approach to managing email that allows for the categorization and scheduling of email based on the work and/or position of the email account owner.

The benefits of the Capstone approach are:

- Increasing the amount of email of permanent value transferred to NARA,
- Reducing the burden on individual end-users within agencies,
- Reducing reliance on print-and-file practices, and
- Allowing for systematic destruction of temporary email based on an approved NARA disposition authority, reducing the amount of email that has no further value being stored by agencies.

## SECTION 1: BACKGROUND Information

### *The National Archives and Permanent Records*

NARA's [mission](http://www.archives.gov/about/info/mission.html)<sup>1</sup> is to provide public access to Federal Government records in our custody and control. Public access to Government records strengthens democracy by allowing Americans to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

The Archivist of the United States determines which federal records warrant permanent preservation and should be transferred to the National Archives for preservation and public access. The decision as to which records are permanent is made through the [scheduling](http://www.archives.gov/records-mgmt/policy/records-schedule-review-process.html)<sup>2</sup> and [appraisal](http://www.archives.gov/records-mgmt/initiatives/appraisal.html)<sup>3</sup> process. Agencies cannot destroy Federal records without the approval of the Archivist of the United States. The Federal Records Act gives the Archivist the authority to determine the retention and disposition of federal records (44 U.S.C Chapters 21, 29, and 33). Authority for the transfer of records with archival value into NARA's legal custody is outlined in 44 U.S.C. Chapters 21 and 29.

Not all records possess permanent archival value. NARA estimates that less than five percent (5%) of records across the Federal Government require permanent retention and should be transferred to the legal custody of the National Archives. NARA determines that most federal records have temporary value and authorizes agencies to destroy them when they are no longer needed for agency business needs, or when legal or public accountability interests have generally expired. A temporary determination by NARA, however, still requires agencies to maintain those temporary records for an amount of time that allows the agency to fulfill their obligations. All Federal records have value and must be kept for some period of time; however, few records have permanent value.

### *Email Management*

Email often meets the definition of a federal record as provided in the Federal Records Act (44 U.S.C., § 3301), which includes:

“... all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.”

Management of email, however, has remained a challenge to most, if not all, federal agencies. In what is often referred to as “traditional records management,” the email management burden is typically placed on each end-user to make a record or nonrecord decision and to determine retention and final disposition under existing records schedules based on the content of the message, on an email-by-email basis. Further, end users may need to determine whether cross-

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<sup>1</sup> <http://www.archives.gov/about/info/mission.html>

<sup>2</sup> <http://www.archives.gov/records-mgmt/policy/records-schedule-review-process.html>

<sup>3</sup> <http://www.archives.gov/records-mgmt/initiatives/appraisal.html>

filing individual emails with other records (such as case files) is required. The end-user must also manage nonrecord<sup>4</sup> email, including those of a personal nature.

Using a traditional records management method, and often due to the lack of effective and affordable electronic records management systems, many agencies adopted a “print-and-file” policy. This policy typically instructs users that electronic records – including email – are to be printed into hard-copy (paper) for official filing. This paper version becomes the official recordkeeping version. This process requires manual intervention by the user, who has to determine whether each email is a federal record, and then determine the appropriate disposition authority and filing location for each email record.

Until recently, NARA supported this practice even as it encouraged agencies to adopt electronic recordkeeping systems, for example through the endorsement of the DoD 5015 standard<sup>5</sup>. The increasing designation of electronic records as the record copy, as well as the growing exponential volume of email that federal agencies are responsible for managing, made this practice untenable as an email strategy. This has led to resource allocation issues: 1) a risk that permanently valuable email is not being appropriately captured and transferred to NARA, and 2) a risk that temporary email is being destroyed too soon or kept far too long.

In 2007, Congress began holding hearings on email records management by the White House and federal agencies. Congress passed legislation requiring email records be managed electronically.

Recently, the press reported several high profile instances of alleged or actual email mismanagement, further highlighting the email management challenge; most notably from the Internal Revenue Service (IRS)<sup>6</sup>, Centers for Medicare & Medicaid’s Services (CMS)<sup>7</sup>, and the Environmental Protection Agency (EPA).<sup>8</sup> These stories further demonstrate the need for a more practical method for managing and preserving email in the Federal Government.

## SECTION 2: RECORDS MANAGEMENT GUIDANCE

Over the past decade, NARA has conducted studies, provided email management guidance,

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<sup>4</sup> *Nonrecord materials* are those Federally owned informational materials that do not meet the statutory definition of records (44 U.S.C. 3301) or that have been excluded from coverage by the definition. Excluded materials are extra copies of documents kept only for reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibit. *Personal files* (also called *personal papers*) are a type of nonrecord material and are documentary materials belonging to an individual that are not used to conduct agency business. Personal files are excluded from the definition of Federal records and are not owned by the Government. (36 CFR 1220.18)

<sup>5</sup> The [DoD 5015.02-STD, signed 25 April 2007](#), defines the basic requirements, based on operational, legislative and legal needs, that must be met by records management application (RMA) products acquired by the Department of Defense (DoD) and its Components. It defines requirements for RMA's managing classified records and includes requirements to support the Freedom of Information Act (FOIA), Privacy Act, and interoperability.

<sup>6</sup> Bump, Philip. “[Here’s How the IRS lost emails from key witness Lois Lerner.](#)” *The Washington Post*, June 16, 2014.

<sup>7</sup> Viebeck, Elise. “[ObamaCare office may have lost emails sought in oversight probe.](#)” *The Hill*, August 7, 2014.

<sup>8</sup> Desjardins, Lisa. “[Environmental Protection Agency tells Congress it lost emails too.](#)” *CNN*, October 3, 2014.

revised regulations for electronic records management, and explored alternative ways of managing email. Policies and guidance released by NARA are available to the public at NARA's [Email Management](#)<sup>9</sup> webpage and specific tools may be found in NARA's [Records Management Toolkit](#).<sup>10</sup>

In response to direction from senior NARA management in 2010, NARA formed the Email Management 2.0 working group. This group, led by NARA's Office of the Chief Records Officer, developed new guidance that aligns with other major records management initiatives under development. It was through this group that the Capstone Approach was researched, developed, and promulgated as guidance.

### *The Presidential Memorandum and Directive*

With the signing of the [Presidential Memorandum on Managing Government Records](#)<sup>11</sup> by President Obama on November 28, 2011, and the subsequent issuance of the [Managing Government Records Directive](#)<sup>12</sup> (M-12-18) on August 24, 2012, by the Office of Management and Budget (OMB) and NARA, a new emphasis was placed on electronic records management.

Specific to email management, Section 1.2 of M-12-18 states, in part, that “[b]y December 31, 2016, federal agencies must manage all email records in an electronic format.” This requirement essentially does away with the traditional print-and-file policies and requires agencies to implement new approaches to manage their email electronically. Some agencies have had success with automated products and solutions, such as software that can automatically determine email content based on keyword searches and assign disposition accordingly. Although technology for fully automated email management is improving, other solutions for email management are required in the interim.

### *NARA Bulletin 2013-02, The Capstone Approach*

Based on the efforts of the NARA Email Management 2.0 group, and the requirements of the M-12-18, NARA released Bulletin 2013-02, [Guidance on a New Approach to Managing Email Records](#)<sup>13</sup> on August 29, 2013 (known as the “Capstone Bulletin”). NARA Bulletin 2013-02 introduced new guidance to assist agencies in meeting the requirements of Section 1.2 of M-12-18.

In addition to the requirements of M-12-18, NARA created this guidance to aid agencies in dealing with the overwhelming volume of email records and to ensure that NARA receives the permanently valuable email of federal agencies. Even though email has been in wide-spread use in federal agencies for over two decades, NARA has not received significant amounts of

<sup>9</sup> <http://www.archives.gov/records-mgmt/email-mgmt.html>

<sup>10</sup> All products are available on NARA's website, <http://www.archives.gov/records-mgmt/toolkit/#list>

<sup>11</sup> <http://www.whitehouse.gov/the-press-office/2011/11/28/presidential-memorandum-managing-government-records>

<sup>12</sup> <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2012/m-12-18.pdf>

<sup>13</sup> <http://www.archives.gov/records-mgmt/bulletins/2013/2013-02.html>

electronically-managed email through traditional records scheduling policies or traditional records management practices.

The Capstone Bulletin established an additional means of managing and scheduling email records where final disposition is determined by the role or position of the account user, rather than the content of each individual email. This allows email disposition to be carried out in a systematic way, where email within 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 accounts designated as temporary are eligible for eventual destruction. This eliminates the email-by-email review by individual end-users within agencies.

The Capstone approach can generally be summarized with the following points:

- Email is managed in an electronic format in compliance with Section 1.2 of M-12-18.
- Final disposition is based on the role or position of the end-user, not the content of each individual email record.
- Email of senior officials could be scheduled as permanent, eventually being transferred to the legal custody of NARA.
- Email of other federal employees could be scheduled as temporary, with authority for eventual destruction.
- Capstone affords flexibility, allowing agencies to design an approach that fits their technology, business needs, and culture.
- Use of the Capstone approach is not mandatory; agencies may develop other solutions that comply with Section 1.2 of M-12-18.

Agencies are encouraged to manage their email records through a Capstone approach. In addition to creating an agency policy on email and an implementation plan, a Capstone approach is further strengthened by:

- Use of automated solutions to block email from specific domains or email addresses from capture (for example, personal email from the accounts of family members account, material that is clearly personal in nature and not a federal record),
- Use of automated solutions to block duplicates (such as email blasts) from capture, and
- Allowing for manual management; for example, allowing end-users time to apply traditional records management before system capture begins (for example, applying other disposition authorities, or deleting nonrecord material).

NOTE: It is important to note that the implementation of a Capstone approach for the management of agency email does not negate other recordkeeping responsibilities. As outlined in the Capstone Bulletin, agencies may still have a need to cross-file certain email with other records, such as case files or subject files. Agencies will remain responsible for ensuring that all other records, including program and project files, are still scheduled and managed appropriately. NARA will continue to receive other permanent record series from federal agencies outside the Capstone approach.

Between September 2013 and February 2014, NARA provided training to federal agencies on the Capstone Bulletin and the Capstone approach. This effort led to the creation of other resources to assist agencies. These resources are available on NARA's [Email Management webpage](#).<sup>14</sup>

### SECTION 3: Disposition Authority for Email Records

The guidance provided in the Capstone Bulletin gives agencies guidance on how to develop a Capstone approach that meets their business needs. It does not, however, provide disposition authority for email records. NARA disposition authority, as with any other federal records, is required when using a Capstone approach.

As highlighted above, prior to the release of the Capstone Bulletin, agencies would rely on a multitude of disposition authorities to manage their email. An email related to a personnel matter, for example, would be disposed of in accordance with personnel-related authorities. An email related to a specific project would be disposed of in accordance with the disposition authority related to those project files. One user's entire body of email would often require use of multiple disposition authorities for proper management. Individual end-users were often not equipped with the resources (including knowledge of disposition authorities) to properly manage their email. This increased the risk of either loss of email through improper disposition or the retention of all email for much longer than actually required by current authorities, unnecessarily expends agency resources and puts additional disclosure burdens on the agency.

The Capstone Bulletin allows agencies to propose a disposition schedule where email becomes its own records series, similar to that of correspondence, with specific disposition instructions for entire bodies of email. Email of senior officials, for example, could be approved for permanent retention, while email of all other officials could be approved for temporary retention. NARA's role in approving disposition authorities under the Capstone approach would be twofold: identify senior officials' accounts for permanent retention and determine the appropriate retention for temporary email to meet agency business needs and assure rights and accountability.

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<sup>14</sup> <http://www.archives.gov/records-mgmt/email-mgmt.html>



## SECTION 4: CAPSTONE GRS DEVELOPMENT

Acknowledging that the majority of federal agencies had an interest in adopting a Capstone approach, NARA next turned its focus to the development of a General Records Schedule (GRS) to provide disposition authority for email records managed under such an approach.

NOTE: The Capstone GRS provides disposition authority for agencies implementing a Capstone approach; it does not provide disposition authority for other email records management strategies. Agencies implementing a Capstone approach must adhere to the definitions provided in this GRS, including the definition of Capstone officials. If an agency cannot adhere to the definitions in the Capstone GRS, they must submit an agency-specific schedule.

The goal of the Capstone GRS is to help agencies meet the requirements of M-12-18. This GRS will allow them to focus on implementation and the management of their email rather than the process of seeking disposition authority from NARA. For NARA, from a government-wide perspective, this GRS will support NARA's oversight responsibilities by reducing subjectivity and increasing consistency in the determination of Capstone officials. The Capstone GRS will establish a baseline understanding of roles and disposition of email across the government. This will reduce the risk of improper implementation.

Development of the Capstone GRS began in May 2013, with the creation of a NARA intra-agency working group. The group consisted of individuals who have a stake, or are subject matter experts, in NARA processes and government-wide records management policy.

The development team, comprised of senior NARA staff in the Office of General Counsel, the Office of the Chief Records Officer, and NARA's Research Services, drafted the GRS and created a supplemental FAQ to provide further guidance to aid in schedule implementation.

### *Challenges*

One of the challenges in developing the Capstone GRS was creating a definition of "Capstone officials"—the definition had to identify those officials whose accounts warrant permanent retention; contain recognizable official positions that would allow for maximum application to various federal agency organizational structures, and ultimately ensure increased transfers of permanently valuable email to NARA.

The efforts to craft this definition resulted in two goals: 1) reduce the possibility of multiple, conflicting interpretations within an agency by developing a clear and understandable definition;

and 2) increase consistency by ensuring that the same type or level of accounts were identified for permanent retention across the Federal Government.

An additional challenge concerned the appropriate retention length for temporary email. The development team had to balance the realities of limited technological resources within federal agencies with the need to maintain temporary email long enough to meet agency business and to assure rights and government accountability. Ultimately, item 011 was crafted for the majority of temporary email within a given agency, with a minimum retention of 7 years. Item 012 was developed as an exception to item 011, allowing for earlier disposition for email in accounts that fall into a very narrow definition of clearly administrative and/or routine duties.

### *Targeted Focus Group*

A targeted focus group was held on May 16, 2014, to solicit feedback from eight agencies on a draft version of the GRS and FAQ developed by NARA staff. The focus group included records management, legal, and information technology officials from several agencies and the discussion focused on the clarity and implementation of the product, including feedback on item descriptions and retention periods, and resulted in changes to the draft GRS.

The focus group illustrated that:

- There was an interest in NARA developing a GRS for Capstone email records.
- Agencies wanted a clear and precise definition of Capstone (permanent) officials, with little room for subjectivity.
- Agencies wanted flexibility in managing temporary accounts, especially for email accounts of very low-level staff performing administrative duties.

### *Government-wide Review*

NARA solicited additional comments on the revised GRS and FAQ drafts via government-wide review in July and August 2014. NARA received comments from numerous agencies. NARA employees also submitted comments during this review period. The number of comments totaled nearly 140. The GRS Development Team adjudicated the comments and made substantial changes to the GRS and FAQ.

Findings from this review included:

- There was an interest in NARA developing a GRS for Capstone email records.
- Agencies required further information about implementation of not only the GRS but also the Capstone approach in general (which were added to the FAQ).
- The definition of Capstone officials needed to be as specific as possible. Earlier versions of the definition were too subjective to ensure proper implementation.
- Flexibility for the temporary email retention was necessary.
- Based on the comments received, NARA should consider a “verification and approval” process for those using this GRS.

### *Internal Tests*

At several points during development of the Capstone GRS the definition of Capstone officials within item 010 (see appendix A) was tested against the organizational structure of several selected agencies. The primary goal was to illustrate whether there could be multiple, inconsistent interpretations of the definition of Capstone official and therefore identify potential issues and risks with these interpretations. Worksheets were created and development team members utilized agency organization charts, [PLUM book](#)<sup>15</sup> entries, and other resources to apply the definition against these agencies. A secondary goal was to increase consistency to ensure that the same type and/or level of accounts could be identified for all agencies utilizing the Capstone GRS. This led to a significant revision of the definition presented in the current draft. The development team saw this as a major step in refining the GRS to ensure proper implementation.

While finalizing this definition, members of the development team acknowledged that more email will likely be transferred as permanent than would have been under application of traditional records management. For example, Capstone may include the email of officials by virtue of their role or position, but who otherwise may not have any other permanent records associated with that role or position. NARA believes this is an appropriate trade-off to ensure that the permanently valuable email is transferred into its legal custody.

### *Structure of the Capstone GRS*

The final draft of the Capstone GRS accounts for all the previously mentioned factors in three separate items:

Item 010: Provides disposition authority for the email of senior officials (i.e., Capstone officials). The item includes a definition of Capstone officials broken down into nine categories and identifies those positions that are required for inclusion when an agency is using this GRS. Please refer to the draft Capstone GRS (Appendix A) for further description of these categories.

The nine categories were created after considering all comments, and after significant review of agency organizational structures. Although the implementation of this GRS may not assure that all permanently valuable email is transferred to NARA, or prevent non-permanently valuable email from being transferred, the Capstone GRS development team felt confident that this definition appropriately identifies permanent Capstone roles and/or positions.

Item 011: Provides disposition authority for the email of all other officials not included in either item 010 or 012. This item is intended to be used for the majority of email managed within a given agency. It sets a minimum retention of 7 years. The item does, however, authorize a longer retention based on agency business needs.

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<sup>15</sup> Every four years, just after the Presidential election, the United States Government Policy and Supporting Positions, commonly known as the PLUM Book, is published, alternately, by the Senate and the House. The PLUM Book is used to identify presidentially appointed positions within the Federal Government. <http://www.gpo.gov/fdsys/pkg/GPO-PLUMBOOK-2012/content-detail.html>

Although some large agencies have expressed concern about the cost of retaining very large volumes of temporary email for seven years, NARA believes that a baseline, seven-year retention for the preservation of temporary email records is appropriate. This will not only meet agency business needs, but also ensure adequate and proper documentation of the policies and transactions of the Federal Government. The preservation of these records for this period of time should generally provide for the adequate defense of the Federal Government in litigation. This presumptive retention period is consistent with most statutes of limitations to pursue matters against the United States, which is generally six years. Additionally, this retention period aligns to recordkeeping requirements set forth by Congress, such as the seven-year retention 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, which is tied to the six-year statute of limitations for criminal violations of the tax code (26 U.S.C., § 6531). These examples, along with others, have led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records.

Item 012: Provides disposition authority for a very small subset of email. NARA developed this item based on feedback received during the agency focus group and during government-wide review. It acknowledges that there is a group of employees in purely administrative or support positions that receive email related to very specific, administrative and/or routine duties. Additional guidance is provided in the FAQ to assist agencies in using this item appropriately. It is expected that the majority of temporary email accounts within an agency should be disposable under item 011, which has a minimum retention of 7 years, rather than under item 012.

The draft also includes instruction and guidance on *culling*<sup>16</sup> within the introduction of the GRS and further within FAQs 19 - 22. Culling was incorporated into the guidance as a result of both internal and external comments, specifically:

- Agencies wanted the flexibility to allow users (or IT administrators) to cull personal and/or nonrecord material. Some agencies expressed concern of personal email being released as part of the permanent record.
- NARA custodial units wanted to reduce the amount of duplicate material and nonrecord material found in transfers of permanent records.

Culling aligns with the requirements of the Federal Records Act, and is a principle of good records management. The Federal Records Act directs that nonrecord material be managed by the agency, and purged when no longer needed; NARA's approval is not required to destroy such materials ([36 CFR 1225.18\(c\)](#)). Culling assists in assuring that clearly nonrecord material is not transferred with permanent records.

Although NARA determined that culling is not mandatory due to the technological limitations of

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<sup>16</sup> *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).

some email systems, culling is desirable to the greatest extent practicable. NARA email management resources include guidance on the use of automated tools within email applications that could, for example, exclude email from specific email addresses and/or specific domains from capture. The flexibility within the Capstone approach allows for manual, automated, or a hybrid of both manual and automated culling.

Although NARA's culling expectations will potentially reduce the volume of nonrecord material transferred, NARA accepts that some amount of personal, duplicate, and nonrecord material will likely be transferred as part of the permanent record. FAQs 20 through 22 further document the importance of culling, and NARA's role in culling after permanent email records have been transferred to NARA.

### *The Capstone GRS FAQ*

To assist in the implementation of the Capstone GRS, NARA developed the Capstone GRS FAQ. The final draft of the Capstone GRS FAQ includes 23 questions that further explain additional resources available, general implementation, verification requirements, differences between items, transfer of permanent accounts, culling, and acceptable formats. The FAQ should be used in conjunction with the GRS.

### *Verification and Approval Process*

To further address implementation challenges, the development team concluded that a "verification and approval" process is necessary for those agencies utilizing this GRS. This verification and approval process will allow NARA oversight of the identification of positions and ensures they are identified consistently across the Federal Government. Several agencies have also expressed a desire to have some form of NARA approval of their Capstone officials prior to implementing Capstone and the Capstone GRS. A verification and approval process will increase an agency's confidence in implementing Capstone appropriately while ensuring NARA is fulfilling its oversight responsibilities.

This verification process will require agencies implementing this GRS to submit a NARA form (number pending), *Verification for Implementing GRS 6.1*, to receive approval prior to implementation of any items of this GRS (see Appendix C). The form serves as either a list of permanent Capstone officials for implementation of item 010, or a list of positions excluded from implementation of items 011 and 012.

The instructions for the verification form define the nine categories of senior officials provided in the definition of Capstone (permanent) accounts in item 010. These definitions acknowledge that different agencies often use different titles for similar positions and are meant to assist agencies in properly identifying those senior officials within their agency that correlate to each category.

The NARA development team is still refining the process of verification and approval. Procedures will be released with the formal transmittal of the Capstone GRS.

### *Next Steps*

NARA will be publishing the draft GRS in the Federal Register for public comment in April 2015. NARA will also hold a public meeting in May 2015 to address any comments or concerns interest groups or the public may have regarding the draft GRS. All comments received either through the Federal Register publication process, or the public meeting, will be adjudicated. Final GRS transmittal is planned for September 2015.

## APPENDIX A: THE CAPSTONE GRS

### 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. When implementing this GRS, agencies should consult the FAQs about GRS 6.1, Email Managed under a Capstone Approach. Agencies are reminded that this GRS should not be implemented in isolation, and should be supplemented with agency-wide policies and training, as well as incorporated into agency records management implementation tools, such as manuals and file plans. Agencies adopting a Capstone approach should also consult other resources available from NARA related to email management, specifically the Capstone approach. These resources are available on NARA's [email management page](#) and are summarized in the introduction to the FAQ.

Agencies must not implement this GRS until approval of [NARA form XXXX \(NA-XXXX\), Verification for Implementing GRS 6.1](#). Additional information, including a link to the form, may be found in FAQ 3 and in the instructions accompanying the form.

#### GRS Scope

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 or what email technology is used. Email, in the context of this GRS, also includes any associated attachments. This GRS may apply to records affiliated with other commonly available functions of email programs such as calendars/appointments, tasks, and chat.

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 parameters for inclusion of day forward/active and/or legacy/inactive email; and
- The extent of inclusion of classified email.

Brief information on the scope of an agency's Capstone implementation is also required on the NARA form XXXX (NA-XXXX), *Verification for Implementing GRS 6.1*.

Agencies are also responsible for defining (and documenting through policy) the official recordkeeping version of email to be managed under a Capstone approach, especially when email is captured or retained in multiple locations (e.g., an email archive vs. the live system). All other versions of email can be considered nonrecord, the retention of which should be addressed in agency email policy.

Agencies are expected to apply documented selection criteria to cull the email of Capstone officials (permanent accounts) to the greatest extent possible before transfer to NARA. Culling refers to the removal – or otherwise excluding from capture – of nonrecord, personal, or transitory messages and attachments. Culling typically includes the removal of spam, 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.

**Applying this GRS**

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

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 covered by another GRS or an 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. For guidance on transferring email as a permanent record, see NARA Bulletin 2014-04, Revised Format Guidance for the Transfer of Permanent Electronic Records and the relevant sections of [36 CFR Part 1235](#).

| Item | Records Description  | Disposition Instruction   | Disposition Authority               |
|------|--|---|-------------------------------------|
| 010  | <p><b>Email of Capstone Officials.</b><br/>                     Capstone Officials are senior officials designated by 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 officials include all those listed on an approved NARA form XXXX (NA-XXXX), <i>Verification for Implementing GRS 6.1</i>, and <b>must</b> include, when applicable:</p> <ol style="list-style-type: none"> <li>1) The head of the agency, such as Secretary, Commissioner, Administrator, Chairman or equivalent;</li> <li>2) Principal assistants to the head of the agency (second tier of management), such as Under Secretaries, Assistant Secretaries, Assistant Commissioners, and/or their equivalents; this includes officers of the</li> </ol> | <p><b>Permanent.</b> Cut off at the end of the calendar year. Transfer to NARA when the records are 15 years old, or after declassification review (when applicable), whichever is later.</p> | <p>DAA-GRS-2014-0001, item 0001</p> |



- Armed Forces serving in comparable position(s);
- 3) Deputies of all positions in categories 1 and 2, and/or their equivalent(s);
- 4) Staff assistants to those in categories 1 and 2, such as special assistants, confidential assistants, military assistants, and/or aides;
- 5) Principal management positions, such as Chief Operating Officer, Chief Information Officer, Chief Knowledge Officer, Chief Technology Officer, and Chief Financial Officer, and/or their equivalent(s);
- 6) Directors of significant program offices, and/or their equivalent(s);
- 7) Principal regional officials, such as Regional Administrators, and/or their equivalent(s);
- 8) Roles or positions that routinely provide advice and oversight to the agency, including those positions in categories 1 through 3 and 5 through 7, including, General Counsels, Chiefs of Staff, Inspectors General, etc.; and
- 9) Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions).

This includes those officials in an acting capacity for any of the above positions longer than 60 days. Agencies may also include individual emails from otherwise temporary accounts appropriate for permanent disposition in this category.

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 or policy decisions and/or are of historical significance. This may include email of staff in lower level (non-senior) positions, or email related to functions in lower-level offices. For example, an agency with mission-centric task forces may include the head of each task force within their Capstone officials.

If a Capstone official has more than one agency-administered email account, this item applies to all accounts. If a Capstone official has an email account managed by other staff (such as personal assistants, confidential assistants, military assistants, or administrative assistants), this item applies to those accounts. This item applies to all email regardless of the address names used by the Capstone official for agency business, such as nicknames or office title names, and email from personal or non-agency email accounts authorized for use for official agency business.

Please consult NA Form XXXX for more information on which positions are included within each category.

NOTE: Cabinet level agencies implementing a Capstone approach that includes their components/operatives must apply the above definition to each component individually. In these cases, each component/operative is

|     |  |  |  |                                     |
|-----|--|--|--|-------------------------------------|
|     | <p>considered a separate agency in terms of the above definition of Capstone Officials. A component/operative of a cabinet level agency can implement a Capstone approach independent of their department but must also conform to the entirety of this definition.</p> <p>NOTE: Smaller agencies, micro-agencies or Commissions implementing a Capstone approach may find that some of their Capstone positions fall into several of the categories above and/or that they do not have applicable roles or positions for all categories.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> |  |  |                                     |
| 011 | <p><b>Email of Non-Capstone Officials.</b><br/>Email of all other officials, staff, and contractors not included in item 010.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p>   | <p><b>All others except those in item 012.</b> Includes positions and email not covered by items 010 or 012 of this schedule.</p> <p>This item will apply to the majority of email accounts / users within an agency adopting a Capstone approach.</p> <p>Item may include transitory email, personal email, and/or email filed with other records but not removed from the email repository.</p>  | <p><b>Temporary.</b> Delete when 7 years old, but longer retention is authorized if required for business use.</p> | <p>DAA-GRS-2014-0001, item 0002</p> |
| 012 | <p>NOTE: Agencies <b>only</b> using item 011 and/or item 012 of this GRS may not dispose of any email of officials listed in the <b>must</b> section of the description provided in item 010, Email of Capstone Officials, of this GRS without authority from NARA in the form of another GRS or agency-specific schedule. Submission and approval of NARA form XXXX (NA-XXXX), <i>Verification for Implementing GRS 6.1</i> is still required in these instances to document those being exempted from Capstone.</p>  | <p><b>Support and/or Administrative Positions.</b> Includes non-supervisory positions carrying out routine and/or administrative duties. These duties comprise general office or program support activities and frequently facilitate the work of Federal agencies and their programs. This includes, but is not limited to, roles and positions that: process routine transactions; provide customer service; involve mechanical crafts, or unskilled, semi-skilled, or skilled manual labor; respond to general requests for information; involve routine clerical work; and/or primarily receive nonrecord and/or duplicative email.</p> <p>Item may include transitory email, personal email, and/or email filed with other records but not removed from the email repository.</p> | <p><b>Temporary.</b> Delete when 3 years old, but longer retention is authorized if required for business use.</p> | <p>DAA-GRS-2014-0001, item 0003</p> |

## APPENDIX B: FAQs ABOUT THE CAPSTONE GRS

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

These FAQs are designed to aid in implementation of GRS 6.1 (Capstone GRS). Agencies are reminded that this GRS should not be implemented in isolation and should be supplemented with agency-wide policies and training, as well as incorporated into agency records management implementation tools, such as manuals and file plans (see FAQ 16). 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.

#### GENERAL QUESTIONS

##### 1. What is the purpose of GRS 6.1?

The purpose of this schedule is to:

- Provide 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
- Assist agencies in meeting 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](mailto: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, this GRS is not to be implemented until an agency receives NARA approval of their list of Capstone officials. This applies when using item 010, and acts as an exception list when only using items 011 and/or 012. Approval is obtained by submitting [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1*. Detailed instructions are provided within the form.

Additionally, NARA's existing regulations and guidance contain several requirements for the proper documentation of an agency's use of the Capstone GRS and the Capstone approach in general. These requirements include, but are not limited to:

- Update of the agency's records management directive and submission to NARA per [36 CFR 1220.34\(c\)](#);
- Posting of the agency's records management directive on the agency's website per the FOIA, 5 USC 552(a)(1)(D) and Office of Management and Budget's Open Government Directive (December 8, 2009); and
- Respond to any questions in NARA-issued requests for information consistent with [44 USC Chapter 29](#), including those specific to Capstone use and implementation.

### 4. May an agency deviate from this GRS?

Yes, agencies may submit a records schedule requesting authority to implement a Capstone approach that deviates from this GRS. Agencies choosing to use one or more items on this GRS, however, without submitting an agency-specific schedule may not deviate from its parameters and must submit [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1*. 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 description provided in item 010, Email 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 shorter than the minimum or 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.

Agencies are encouraged 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. This, therefore, includes part-time employees, student employees, term, temporary employees, volunteers, interns, members of the military, and contractors who create Federal records.

## 6. Who are the Capstone officials covered by this GRS?

An agency’s Capstone officials are to be documented and submitted on [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1*. This form contains additional instructions to assist agencies in identifying their officials. Capstone (permanent) officials are senior (e.g., those high on the organization chart) officials generally responsible for agency and program policy- and mission-related actions. Capstone officials will vary agency by agency depending on how the roles at the agency are carried out and how the agency is organized. 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/operatives must apply the above definition to each component individually. In these cases, each component/operative is considered a separate agency in terms of the above definition of Capstone Officials. A component/operative of a cabinet level agency can implement a Capstone approach independent of their department but must also conform to the entirety of this definition. A general rule of thumb is that every record group (RG) included in the Capstone implementation should have its own group of Capstone officials.

Agencies that require additional assistance in identifying their Capstone officials should contact their [NARA Appraisal Archivist](#).

## 7. How do agencies determine what other roles and positions should be included as Capstone officials?

Agencies may determine that there are additional Capstone roles and positions appropriate for inclusion in item 010. As included in the *may* section of the description provided in item 010, Email of Capstone Officials, this should include roles, positions, or programs that predominantly create or maintain permanent records related to mission-critical functions, policy decisions, and/or have historical significance that are not listed in the **must** section. These additional Capstone officials should be included in the agency’s submission of [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1*

**8. 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 title (e.g., [ArchivistOfTheUnitedStates@nara.gov](mailto: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. See category 4 within item 010.

Additional information may be found 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.

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

Yes. Agencies should maintain an extended version of the [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1* that includes this additional information. Doing so will support the requirements in 36 CFR 1235.48, which states that proper documentation be included with the transfer of permanent electronic records. The list will help with implementing Capstone and with facilitating the export and transfer of permanent email. Best practices include managing a list of Capstone officials and their associated email addresses as part of agency policy. Such a list should be kept up-to-date. See also question 23.

**10. What is the difference between items 011 and 012?**

Item 011 is intended for 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 questions 11 and 12. The majority of temporary email accounts should fall into this item.

Item 012 is intended for routine and/or administrative roles within an agency. Depending on an agency's unique organization, functions, and/or business needs, this item may only be appropriate for a limited number of roles. Agencies having difficulty determining whether item 012 is appropriate should use item 011.

**11. 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, they are included in item 011 which specifies a minimum retention of 7 years. See also questions 10 and 12.

**12. How does an agency determine if temporary email covered by items 011 and 012 should be kept longer than the prescribed minimum retention?**

Agencies should involve multiple stakeholders, such as their Senior Agency Official for Records Management, General Counsel, Chief Information Officer, Records Officer, etc. for guidance in determining the appropriate retention for email.

Items 011 and 012 each prescribe a minimum retention period, and the disposition instructions support flexible scheduling. This authorizes an agency to make internal decisions on whether or not temporary accounts should be kept longer based on business and legal needs. This decision should be documented via agency policy and disseminated through agency-wide implementation tools and training.

Agencies may determine that using only item 011 with one agency-wide retention for all temporary email may better meet their business and legal needs and may also be easier to implement. For example, under the parameters of this GRS, an agency may decide that all temporary accounts are to be maintained for 7 years, regardless of role or position. Agencies choosing to use only item 011 for temporary email also may maintain accounts longer for business needs, e.g., 15 years, without additional authority from NARA. See also questions 10, 11, and 18.

**13. Why is the minimum retention for item 011 7 years?**

NARA believes that a baseline, seven-year retention for the preservation of temporary email records is appropriate, not only to meet agency business needs, but also to ensure adequate and proper documentation of the policies and transactions of the Federal Government. The preservation of these records for this period of time should generally provide for the adequate defense of the Government in litigation or the vindication of rights by a plaintiff in the event the Government has infringed on such rights. This presumptive retention period is consistent with most statute of limitations to pursue matters against the United States, which is generally six years, with recordkeeping requirements set forth by Congress, such as the seven-year retention 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, which is tied to the six year statute of limitations for criminal violations of the tax code. These examples, along with others, have led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records.

This Capstone GRS allows agencies to elect a shorter retention using item 012 (3 years) for very specific roles and positions. Please refer to FAQ 10 for additional information. Agencies who wish to seek a shorter retention must submit an agency-specific schedule.



## QUESTIONS ABOUT IMPLEMENTATION

### 14. 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 only using item 011 and/or 012 are further reminded that they may not dispose of the email of any official listed in the **must** section of the description provided in item 010, Email of Capstone Officials, without authority from NARA in the form of another GRS or agency-specific schedule. An agency must still submit for approval [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1* in order to implement the use of either only the permanent item or only the temporary items of this GRS.

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.

As indicated in the “GRS Scope” section of the Capstone GRS introduction, an agency may choose to exclude several categories of email from coverage by this GRS. The agency must ensure that any such email excluded from Capstone coverage is scheduled by another NARA-approved authority before disposition is carried out on the email. See also question 15.

### 15. 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 schedules be applied from a certain date forward.

### 16. Does this GRS 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 covered by the Capstone GRS. In instances where these records are managed separately from the email, agencies must have NARA approved disposal authority.

### 17. 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 the greater use of automated methods for managing email accounts. Agencies are responsible for managing their



records in accordance with NARA regulations and fulfilling the requirements of the Managing Government Records Directive. When using the Capstone approach for capturing and managing email, agencies are reminded of the following requirement as outlined in NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records [Capstone], item 5d:

***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.*

### **18. How can this GRS be incorporated into agency 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;
- 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);
- Providing additional policy on how to handle email of officials in an acting position;
- Providing policy on managing nonrecord email;
- Including other disposition authorities related to email, including the GRS item for transitory records;
- Providing information on agency policy related to culling and other opportunities to apply records management to email; and
- Implementing procedures for initiating record freezes and litigation holds.

## QUESTIONS ABOUT CULLING

### 19. 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). Please refer to [GRS 23, item 7](#), for additional information on what constitutes a transitory record.

### 20. Are agencies/users expected to cull Capstone email accounts?

Yes. Since agencies are most familiar with the content of their email records, culling permanent accounts is expected to the greatest extent possible. Culling may be manual, automated, or a hybrid of both. For temporary email, agencies are free to choose the amount of culling to be allowed, 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.

### 21. 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 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. 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 per 36 CFR 1256.56 without consulting 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.

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

Since agencies are most familiar with the content of their email records, they are expected to cull nonrecord material to the extent possible before transferring. In accordance with 44 U.S.C. 2108, custody of these records becomes the responsibility of the Archivist of the United States at the time of transfer of the records. It is agreed that these records will be administered in accordance with the provisions of 44 U.S.C. Chapter 21, 36 CFR XII, 36 CFR Part 1256 and such other rules and regulations as may be prescribed by the Archivist of the United States (the Archivist). The Archivist may destroy, donate, or otherwise dispose of any containers, duplicate copies, unused forms, blank stationary, non-archival printed or processes material, or other nonrecord material in any

manner authorized by law or regulation. Without further consent, the Archivist may destroy deteriorating or damaged documents after they have been copied in a form that retains all of the information in the original document. The Archivist will use the General Records Schedule and any applicable records disposition schedule of the transferring agency to dispose of non-archival materials contained in any transfer. NARA cannot, however, guarantee any level of culling of records legally transferred.

## QUESTIONS ABOUT TRANSFER

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

See [NARA Bulletin 2014-04](#), Revised Format Guidance for the Transfer of Permanent Electronic Records, for 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. This documentation should be an extension of the agency's approved [NARA form XXXX](#) (NA-XXXX), *Verification for Implementing GRS 6.1*, which documents approved permanent Capstone roles and positions. Please also see question 9.

Agencies must transfer to NARA the email 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. 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:

| Position Title            | Email Account/Address      | Begin Date of Capture | End Date of Capture |
|---------------------------|----------------------------|-----------------------|---------------------|
| 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          |                     |

## APPENDIX C: VERIFICATION FORM

### VERIFICATION FOR IMPLEMENTING GRS 6.1: EMAIL MANAGED UNDER A CAPSTONE APPROACH

#### SECTION A: Agency and Scope Information

This section captures general information about the agency and the scope of Capstone implementation. This includes: 1) name of the agency to which this form applies; 2) selection of which GRS items the agency is proposing to use; and 3) information on implementation scope, such as whether agency-wide, limited to a specific component/office, whether all email is included, or implementation is limited to day-forward or legacy email only. Also required is the record group to which this scope applies.

NOTE: One form is required for each unique implementation plan (for example, if implementation is limited to two program offices, but each program office differs in their implementation, one form for each is required) and/or per record group (RG) included (for example, a department implementing Capstone on behalf of their components which have separate record group numbers would need to submit one form per component/record group). This ensures that all positions are appropriately identified and documented.

| NAME OF AGENCY |
|----------------|
|                |

| GRS 6.1 ITEM(S) PROPOSED FOR USE |                                   |                                   |                                   |
|----------------------------------|-----------------------------------|-----------------------------------|-----------------------------------|
| ALL <input type="checkbox"/>     | ITEM 010 <input type="checkbox"/> | ITEM 011 <input type="checkbox"/> | ITEM 012 <input type="checkbox"/> |

| SCOPE            |   |
|------------------|---|
| <b>Applies:</b>  | Agency Wide <input type="checkbox"/> Component/Office <input type="checkbox"/> (Explain in additional scope comments) |
| <b>Includes:</b> | Day Forward <input type="checkbox"/> Begin Date:  |
|                  | Legacy Email <input type="checkbox"/> Date Span:  |

| ADDITIONAL SCOPE COMMENTS |
|---------------------------|
|                           |

| APPLICABLE RECORD GROUP NUMBER |
|--------------------------------|
|                                |

| TOTAL OF ALL ACCOUNTS PROPOSED AS CAPSTONE | (auto populate from fields below) |
|--|-----------------------------------|
|  |                                   |

\* Note, this field will auto-populate as the rest of the form is completed.

**SECTION B: List of Capstone Accounts (GRS 6.1, item 010)**

This section captures a listing of all positions or roles that fit into the definitions provided in item 010 of GRS 6.1. This, **at minimum**, includes all those positions listed in the 9 “**must**” categories within the item’s description, but also allows inclusion of any additional positions or roles the agency feels are appropriate. This section is required even in instances where only the temporary items (011 and/or 012) are being used, in which case it acts as an exception list. This section is broken down to correspond to the categories provided under item 010.

The number of accounts is an estimate of the number of accounts affiliated with an entry. For example, the head of the agency may be one Executive Directive who utilizes two (2) different accounts to conduct business. In this case the entry would be “Executive Director” and the number of accounts would be 2.

Some agencies may not have any positions for certain categories. Please refer to GRS 6.1, the corresponding FAQ #6, and the definitions provided within each category below for additional information on which positions must be included in a Capstone approach.

NOTE: the list should be of positions or roles (for example, “Secretary”), not specific individual names or email addresses (for example, “John Smith” or “[john.smith@agency.gov](mailto:john.smith@agency.gov)”). Agencies may summarize or condense specific levels of management, rather than repeat positions. For example, an agency may input one entry for “All Under-Secretaries” with a position total that represents the number of said positions, rather than listing out each specific Under-Secretary.

**1. The head of the agency, such as Secretary, Commissioner, Administrator, Chairman or equivalent.** The very top executive of the agency. For cabinet level agencies, this is typically a Secretary. For independent agencies, and components within cabinet level agencies, this may be a Commissioner, Administrator, Director, or a specialized title (such as “Archivist of the United States”). For other agencies, including Commissions and Boards, this may be a Chairman, Executive Director, a group of Commissioners, Council Members, Board Members, or the equivalent. Most agencies will have one position for this category (although the one position may have multiple email accounts); some agencies, such as Commissions and Board, may have multiple positions in the category.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
|-----------------------|---------------|
|                       |               |
|                       |               |
|                       |               |

(Add additional rows, or attach a separate sheet, as necessary)

**2. Principal assistants to the head of the agency (second tier of management), such as Under Secretaries, Assistant Secretaries, Assistant Commissioners, and/or their equivalents; this includes officers of the Armed Forces serving in comparable position(s).** Generally the second-tier of management within an agency, this may include Under Secretaries, Assistant Secretaries, Assistant Commissioners, Vice Chairmen, etc. Some agencies may use other terminology, such as “Associate.” The number of positions at this level will vary greatly agency to agency. Some may only have one, such as an Assistant Commissioner, while others may have multiple, such as numerous Assistant Secretaries each with oversight of a specific program, bureau, or line of business within the agency.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
|-----------------------|---------------|
|-----------------------|---------------|

|  |  |
|--|--|
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |

(Add additional rows, or attach a separate sheet, as necessary)

**3. Deputies of all positions in categories 1 and 2, and/or their equivalent(s).** Most of the first- and second-tier executives covered in the first two categories have corresponding deputy position(s) that assist in the daily operations of the agency. This includes Deputy Secretaries, Deputy Commissioners, Deputy Assistant Commissioners, etc. The number of deputy positions will also vary greatly from agency to agency.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
|-----------------------|---------------|
|                       |               |
|                       |               |
|                       |               |
|                       |               |
|                       |               |
|                       |               |

(Add additional rows, or attach a separate sheet, as necessary)

**4) Staff assistants to all positions in categories 1 and 2, such as special assistants, confidential assistants, military assistants, and/or aides.** For those senior officials in categories 1 and 2, important work is often carried out by special assistants, confidential assistants, military assistants, aides, executive assistants, etc. They may send email on behalf of senior officials and/or their email account contains email closely related to the responsibilities and actions of the senior officials they support. For example, a “special assistant” to the Secretary of Defense, or a “Counselor” to Secretary of Health and Human services would fall into this category.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)

**5) Principal management positions, such as Chief Operating Officer, Chief Information Officer, and Chief Financial Officer, and/or their equivalent(s).** These positions tend to be those executives who have operational and management responsibilities within an agency, including Chief Operating Officer, Chief Information Officer, Chief Knowledge Officer, Chief Technology Officer, and Chief Financial Officer. These positions are often required by statute or Executive Order. For example, the Chief Financial Officer Act and the Chief Technology Officer Act. For some agencies, these positions may already be covered by other categories.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
|-----------------------|---------------|
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(Add additional rows, or attach a separate sheet, as necessary)

**6) Directors of significant program offices, and/or their equivalent(s).** Those Directors (or equivalents, such as Executive Directors, Managers, Directorates, or Chiefs) that oversee and manage major program offices, bureaus, or lines of business that support the agency mission. For example, many agencies will have a Director that oversees Congressional and Legislative affairs, or a Director that oversees one specific mission-related program office. For some agencies, these positions may already be covered by other categories.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)

**7) Principal regional officials, such as Regional Administrators, and/or their equivalent(s).** Those agencies with a regional structure must include the accounts of principal regional officials. For most agencies with a regional presence this will be limited to Regional Administrators, or those officials who are responsible for the management and operations of specific regional areas (e.g., an agency that has 10 regions to carry out mission-critical activities would include those 10 Regional Administrators). It does not pertain to the heads of individual offices within regions, 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).

| POSITION TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)

**8) Roles or positions that routinely and directly advise the above positions, including special advisers, General Counsels, Chiefs of Staff, Inspectors General, etc.** Many management positions routinely provide advice and oversight to the agency in the course of daily business, and are involved in mission related policy formulation, implementation, and/or interpretation. This may include general program oversight, legal protection and oversight, and daily operations and management. For most agencies this will include General Counsels, Chiefs of Staff, Inspectors General and special advisers (such as “Policy Advisors”) within the top tiers of the agency. This does not include those that advise on purely administrative issues. For example, a Chief of Staff within a lower tier of the agency would not be included in this category.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)

**9) Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions).** This category is a catch all for any position that was filled by Presidential Appointment with Senate Confirmation (PAS) but not represented in any of the other categories. For most agencies the PAS positions will already be captured in categories 1 through 8, and no other PAS positions will need to be identified.

| POSITION TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)

**Additional positions proposed for inclusion.** These may represent roles, positions, and/or programs within the agency that predominantly create permanent records related to mission critical functions or policy decisions and/or are of historical significance. This may include email of staff in lower level (non-senior) positions, or email related to functions in lower-level offices. For example, an agency with mission-centric task forces may include the head of each task force within their Capstone officials.

| TITLE / ROLE | # OF ACCOUNTS |
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(Add additional rows, or attach a separate sheet, as necessary)



**SECTION C: Agency Approvals**

| TITLE   | PRINTED NAME | SIGNATURE | DATE |
|---|--------------|-----------|------|
| Records Officer                                     |              |           |      |
| Senior Agency<br>Official for Records<br>Management |              |           |      |

----- *Below for NARA Use Only* -----

**SECTION D: NARA Approvals**

|                  |  |
|------------------|--|
| Date of Receipt: |  |
|------------------|--|

| TITLE   | PRINTED NAME | SIGNATURE | DATE |
|---|--------------|-----------|------|
| Chief Records<br>Officer of the<br>United States: |              |           |      |

DRAFT

## APPENDIX D: NARA APPRAISAL REPORT

**Date:** February 18, 2015  
**Appraiser:** Sean A. Curry & Meredith L. Scheiber, ACNR  
**Agency:** General Records Schedules (GRS)  
**Subject:** DAA-GRS-2014-0001

### INTRODUCTION

#### Schedule Overview

GRS 6.1: Email Managed Under a Capstone Approach

#### Additional Background Information

##### **Related NARA Guidance**

NARA Bulletin 2013-02: Guidance on a New Approach to Managing Email Records [Capstone] establishes an additional means of managing and scheduling 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 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 accounts designated as temporary are eligible for eventual destruction. NARA created this guidance to aid agencies in dealing with the overwhelming volume of email records and to ensure that NARA receives the permanently valuable email of Federal agencies, which we were not receiving comprehensively or consistently across the Federal Government through traditional records management practices and scheduling policies. This guidance only gives agencies the authority for this approach and to submit schedules in line with this approach, however, it does not give disposition authority for email records.

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

##### **Rationale for Development of a GRS**

This GRS was developed to provide disposition authority only for those agencies choosing to implement a Capstone approach and is only applicable to those agencies. Implementation of a Capstone Approach is optional. Agencies using a Capstone approach, may, however, choose to deviate from this schedule by submitting their own schedule to NARA. This schedule is NOT media neutral.

The goal of this GRS was to help agencies meet the requirements of M-12-18 and streamline the appraisal process by minimizing the submission of individual agency schedules that would be similar, if not the same, in scope and application. For NARA, from a government wide perspective, this GRS will also reduce subjectivity and increase consistency in the determination of Capstone officials, reduce the risk of improper implementation, and support NARA’s oversight responsibilities for records management in the Federal Government. For agencies, this will allow them to focus on implementation and the management of their

email rather than the process of seeking disposition authority, while also reducing the risks for them of improper capture of officials and improper implementation of a Capstone Approach.

### ***Development Process***

Development began in May 2013, with creation of a team of NARA employees who have a stake, or are subject matter experts, in NARA processes, policy, and records management. These representatives are from 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); and Agency Services, Records Management Policy (ACPP). Additional input was received from 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).

The development team, in addition to drafting the GRS, also created a supplemental FAQ to provide further guidance and to aid in implementation. Among information on implementation, culling, and transfer, there is also information on 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.

A targeted focus group was held on May 16, 2014, to solicit feedback from 8 agencies on a draft version of this GRS and FAQ. Participation in this focus group included: Department of State; Department of Labor; Department of the Interior, Office of the Secretary; Social Security Administration; Central Intelligence Agency; Department of Labor, Bureau of Labor Statistics; Department of Defense, Office of the Secretary of Defense; and Department of Defense, Department of the Navy. At this meeting, discussion focused on the understandability and implementability of the drafts, including feedback on item descriptions and retention lengths. Changes were made to the drafts based on this discussion, but also retaining aspects that NARA required regarding oversight and implementation concerns and applicability of the documents for a wide range of agencies.

Additional comments were solicited on the revised GRS and FAQ drafts via government-wide review in July and August of 2014. Comments were received from the following agencies: Department of Commerce; Department of Education; Department of Defense, Department of the Navy; Department of Defense, Office of the Secretary; Department of Labor, Bureau of Labor Statistics; Department of Agriculture, Food and Nutrition Services; Department of Veterans Affairs; Social Security Administration; the U.S. Commodity Futures Trading Commission; the Central Intelligence Agency; and Department of Justice, Federal Bureau of Investigation. Multiple comments were also received from NARA employees. All comments were adjudicated, and substantial changes were made to the GRS and FAQ, while again increasing and/or preserving aspects that NARA required regarding oversight and implementation concerns and applicability of the documents for a wide range of agencies.

One of the largest changes resulting from this government-wide review and other comments received internally is the inclusion of a verification process. This requires agencies utilizing this GRS to submit NARA form XXXX (NA-XXXX), Verification for Implementing GRS 6.1, and receive approval prior to implementation of any items of this GRS. The form becomes either a list of permanent Capstone officials for implementation of item 010 or a list of positions excluded from implementation of items 011 and 012. This process ensures

that NARA is able to provide adequate oversight of the implementation of this GRS by reducing subjectivity and ensuring consistency in implementation across agencies.

Additional changes consisted of separating the original single temporary item into two items with different retention lengths. NARA acknowledges with this addition that there may be a group of employees in purely administrative or support positions that do not need to be retained for agency business needs for as long as other temporary email. The description for permanent Capstone Officials was also refined to provide clarity and greater scope of applicability to the various structures and positions present in Federal agencies. This new definition was further tested using a sampling of agencies to determine if the desired permanent accounts would be captured across various types of agencies. The definition was further refined and narrowed based on these results. This did not drastically alter the definition.

### **Appraisal of this GRS**

The appraisal for this schedule was derived from, and aligns with, the NARA Email Management 2.0 project conducted between 2011 and 2013, and which led to the issuance of Bulletin 2013-02. Hence, this appraisal was less focused on the content of individual email messages, and based more on the responsibilities and roles of typical senior-level Government officials. In a sense, therefore, this was an appraisal of the functions of specific roles and positions within the Federal Government, rather than appraisal of specific content. Significant focus was paid to the definition of Capstone officials (the permanent accounts) provided in item 010 in order to develop a minimum list that would capture and be 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 discussions or actions 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 Supporting 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.

NARA believes that this schedule for the following items meets our policy, authority under laws and regulations, and mission. Please see *White Paper: The Capstone Approach and Capstone GRS* for more information on Capstone appraisal and the appraisal process.

### **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 and roles that meet the definition provided within the item description.

**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 actions and documentation.

- \* High potential research value.
- \* Permanent email of Capstone officials compliment and correlate to other records series scheduled as permanent in Federal agencies and residing in the holdings of NARA. Some of this email may be duplicative of some records in those other series; however, capturing these officials ensures that NARA is receiving a comprehensive collection of permanently valuable email from high-ranking roles or positions in the Federal Government, which NARA may not otherwise receive.

**Adequacy of Proposed Transfer Instructions:** Adequate. The 15 year transfer is proposed due to the sensitive nature of most senior level email communications, and to align with the typical transfer time for permanent records pursuant to Research Services' guidance. The caveat related to declassification allows for longer retention prior to transfer for those agencies that have classification authority, and classified email.

**Media Neutrality:** Not approved. Records are exclusively electronic.

**Item 0002: [011] Email of Non-Capstone Officials: All Others Except Those in Item 012**

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 positions and roles not covered by items 0001 [010] or 0003 [012]. This item, therefore, is the default item for email that does not fit into the definitions provided in items 0001 [010] or 0003 [012], and will include email that, although it does not have permanent value, is required for agency business use, including assurance of accountability.

**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 [010].
- \* Little to no research value. The positions and roles covered under this item are not typically associated with policy creation or other high-level actions, or in cases where they are, the documentation is also captured within the accounts of higher officials covered by item 0001 [010].
- \* 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 and/or significant nature will be captured in other scheduled series at agencies.

**Adequacy of Proposed Retention Period:** Adequate from the standpoint of legal rights and accountability. Based on feedback received during the targeted focus group, this item sets a minimum retention of 7 years, but authorizes agencies to implement a longer retention based on business and legal needs. NARA believes that a baseline, seven-year retention for the preservation of temporary email records is appropriate, not only to meet agency business needs, but also to ensure adequate and proper documentation of the policies and transactions of the Federal Government. The preservation of these records for this period of time should generally provide for the adequate defense of the Government in litigation or the vindication of rights by a plaintiff in the event the Government has infringed on such rights. This presumptive retention period is consistent with most statute of limitations to pursue matters against the United States, which is generally six years, with recordkeeping requirements set forth by Congress, such as the seven-year retention 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, which is tied to the six year statute of limitations for criminal violations of the tax code. These examples, along with others, have led NARA to conclude that seven years is an appropriate baseline retention period for temporary email records. This Capstone GRS does, however, allow agencies to elect a shorter retention using item 012 (3 years) for very specific roles and positions. Questions in the FAQ provide additional guidance on agency's determining the appropriate

period for email based on their own unique business and legal needs, and the importance of creating policy and training around Capstone. This includes when it may be appropriate to use this item instead of item 0003 [012] for temporary positions and roles.

**Media Neutrality:** Not approved. Records are exclusively electronic.

**Item 0003: [012] Email of Non-Capstone Officials: Support and/or Administrative Positions**

This item includes email, regardless of how it is managed (by account, part of a larger aggregate, etc), that is not related to positions or roles covered by item 0001 [010] (permanent accounts), but which relates to non-supervisory and routine and/or administrative positions and functions within an agency.

**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 or other high-level actions, will be captured in item 0001 [010]. Email that is temporary, but related to more substantive functions in the agency, must be managed under item 0002 [011].
- \* Little to no research value. The positions covered under this item are associated with non-supervisory, administrative and/or routine activities.
- \* 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 and/or significant nature will be captured in other scheduled series at agencies.

**Adequacy of Proposed Retention Period:** Adequate from the standpoint of legal rights and accountability.

The GRS sets a minimum retention band of 3 years based on feedback received during the targeted focus group. Agencies at this meeting were able to identify certain accounts/positions that will contain substantially nonrecord and duplicative email, or email related to routine business actions (such as customer service based operations, etc.), which may be appropriate for a lower retention period. NARA agrees and acknowledges with this item that there may be a group of employees in these types of roles and/or positions that do not need to be retained for agency business needs for as long as temporary email in item 0002 [011]. However, NARA believes that email from these types of roles and/or positions should be retained for at least a minimum of 3 years to ensure adequate and proper documentation of the policies and transactions of the Federal Government. Questions in the FAQ provides additional guidance on agency's determining the appropriate period for email based on their own unique business and legal needs, and the importance of creating policy and training around Capstone.

**Media Neutrality:** Not approved. Records are exclusively electronic.

Sean A. Curry  
Appraiser

Meredith L. Scheiber  
Appraiser

## **APPENDIX E: TARGETED FOCUS GROUP ATTENDEES**

Central Intelligence Agency

Department of Defense, Department of the Navy

Department of Defense, Office of the Secretary of Defense

Department of Labor

Department of Labor, Bureau of Labor Statistics

Department of State

Department of the Interior, Office of the Secretary

Social Security Administration

## **APPENDIX F: GOVERNMENT-WIDE REVIEW COMMENTERS**

Central Intelligence Agency

Department of Agriculture, Food and Nutrition Services

Department of Commerce

Department of Defense, Department of the Navy

Department of Defense, Office of the Secretary

Department of Education

Department of Justice, Federal Bureau of Investigation

Department of Labor, Bureau of Labor Statistics

Department of Veterans Affairs

Social Security Administration

U.S. Commodity Futures Trading Commission