Informational Session: Capstone, A New Approach to Managing Email Records

February 4, 2014



# Today's Agenda

- Opening Remarks
- Brief Overview of the Capstone Approach
- Session 1: NARA's Capstone Email
   Management Implementation: Policy
   Perspective

-15 Minute Break-

Session 2: Capstone and Email Management
 Q&A

### Capstone: A New Approach to Managing Email Records

### Managing Government Records Directive

- Managing Government Records Directive, Goal 1.2, requires agencies to manage all email electronically by December 31, 2016.
- Directive Action A2 requires NARA to create new email guidance:
  - "By December 31, 2013, NARA will issue new guidance that describes methods for managing, disposing, and transferring email."

### Capstone: A New Approach to Managing Email Records

### Capstone Concept:

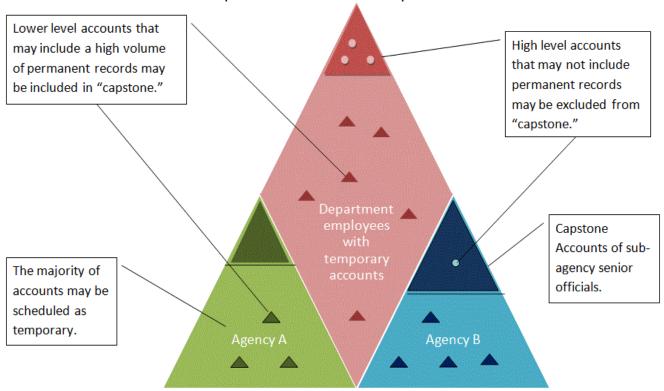
- Manage email records at the account level.
- Leverage the agency's existing technology rather than requiring the purchase and use of specific technology.
- Allow for the disposition of clearly temporary accounts, while identifying and capturing permanently valuable email accounts.



### **Capstone Accounts**

Example: Capstone implementation at a Department with two sub-agencies

Capstone accounts of Department AB





# NARA's Capstone Email Management Implementation: Policy Perspective

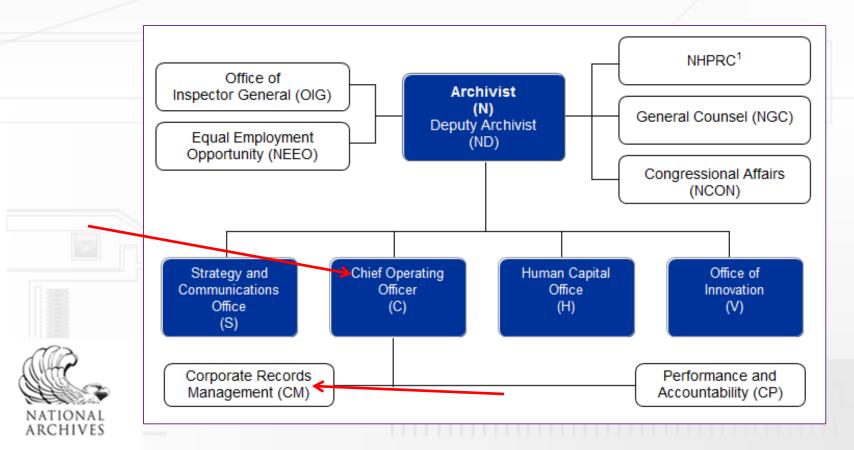
Susan J. Sullivan, CRM
Director – Corporate Records Management

February 4, 2014



## NARA's Internal RM Program

NARA's Corporate Records Management Staff is organized under the Chief Operating Officer and is responsible for the internal NARA records management program.



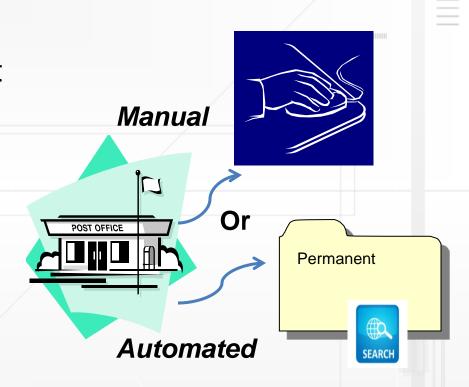
## Past Policy – Print and File

- NARA's official policy for email management was print-andfile
- Each end-user was responsible for email management
- Staff managed individual email messages using existing disposition authorities, based on content.



# Conducted an Internal Study

- Senior Executive's email can be categorized as permanent
- Search rules can assist in identifying email for both deletion and retention
- NARA can capture email records by role with minimal or no user input.





# Developed Requirements (What we needed)

- Immutable email management solution
- Integrated with the messaging system according to federal requirements to manage the content of the email system as electronic records, including but not limited to:
  - messages,
  - attachments, and
  - associated metadata
- Must maintain functionality and integrity throughout the records' full lifecycle.



# Developed Requirements (How to implement)

- .....automated capture in an open format of all email messages EXCEPT:
  - (1) where automated "rules" exclude some objects from capture
  - (2) where manual actions over-ride the automated "rules" in place
- .....an automated rules-based approach to records management.
  - ability to establish records categorization rules
  - automatically categorize records for management, disposition, transfer.



### Formed a Team

NARA developed a team of internal stakeholders to lead a Capstone approach to meet NARA's business needs:

- Corporate Records Management
- Office of General Counsel
- Chief Information Officer staff
- Office of Chief Records Officer (Paul Wester's group)
- Members of Senior Leadership (monitoring / supporting).



## **Defined Capstone Accounts**

- 48 staff members were identified as "Capstone"
  - Agency Head & Deputy
  - "C" Level Officials
  - Executives
  - Directors of major programs
  - Presidential Library Directors

Permanent top decision-makers

Temporary

Non-record



# **Determined Capture Methodology**

### **Journaling**

- Captures all sent and received
- For e-Discovery and RM quality monitoring

### **Mailbox Crawling**

**AND** 

- For records management
- Rules based
- Acts on labels, if applied
- Excludes "non-record", deleted, draft, spam
- Supports "Safe Harbor"
- Requires extra security (IMAP)



### **Decided Scope**

- Email messages and attachments
- Calendars and appointments
- Tasks (that are part of a calendar)
- Chat transcripts (that are moved to a mailbox)
- January 22, 2013 is the designated effective date
  - Objects created or received after January 21, 2013 are captured and automatically categorized as permanent or temporary records under Capstone, by default.



### **Determined Policy for Legacy Content**

- If sent or received before effective date (January 22, 2013)....
  - NARA's print and file policy still applies (electronic = convenience copies)
  - Or, users may manually categorize these items as temporary, permanent, or non-records within RMA as needed.



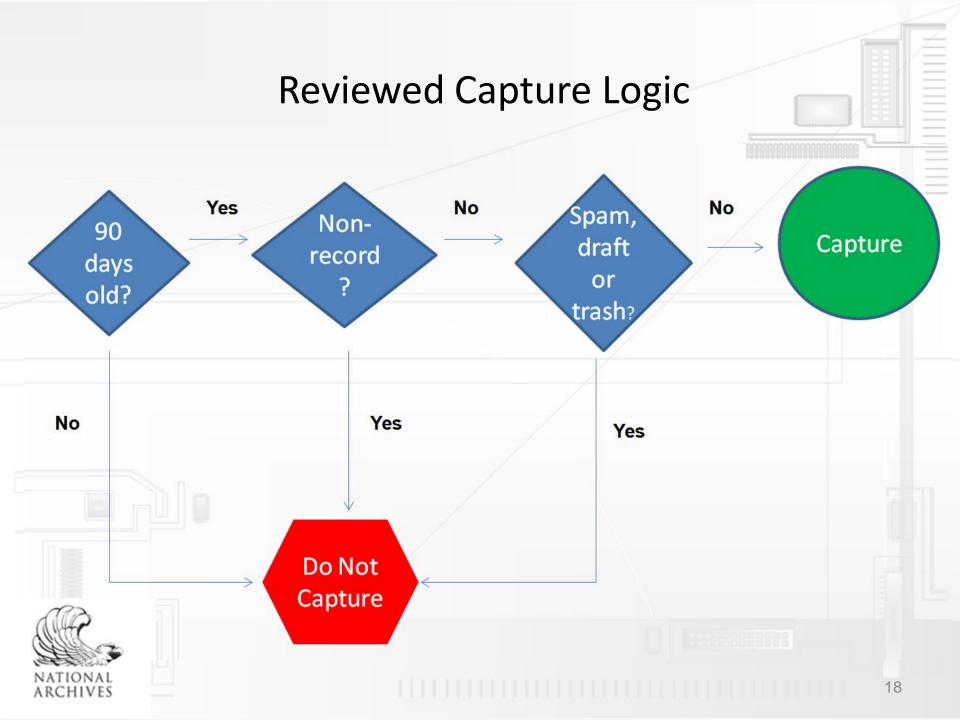
# Adopted "Safe Harbor"

**Gmail Safe Harbor** – Time period before recordkeeping capture to:

- Delete useless non-records
- Label non-record information that users want to keep
- Label records as Temporary or Permanent when the default Capstone retention category, based on user's role, is inappropriate

RMA Safe Harbor – After capture, time period to review captured records in the RMA and change the default category (e.g., from temporary to non-record).





# **Developed Records Declaration Policy**

- Is the account designated as Senior Official?
  - Yes. Declare / file as permanent
    - if not labeled as "temporary".
  - No. Declare / file as temporary
    - if not labeled as "permanent".



### Specified the "File Plan" in RMA

#### Permanent

- Default for Sr. Officials
- Labeled as "Permanent" by those not identified as Sr. Officials
- Re-categorized as Permanent during RMA Safe Harbor
- Manually categorizing pre-January 22 messages under Capstone

#### Temporary

- Default for everyone else (not Sr. Officials)
- If labeled as "Temporary" by Sr. Officials
- For re-categorizing as Temporary (e.g., by Sr. Officials) during RMA Safe Harbor
- Manually categorizing pre-January 22 messages under Capstone
- Non-Record
  - For re-categorizing during RMA Safe Harbor (i.e., from Permanent or Temporary)



# Communicated, communicated, communicated



### Briefings, blogs, Intranet, and emails!





### **Addressed Nuances**

- Capstone may work well for daily communications that are not necessarily part of a business process.....BUT
- When business practices require email to be retained as part of a case file or other recordkeeping system....
- ....staff should manage these records outside of the archive and retain them according to the applicable records disposition schedule.

### Migrated Data from Former RMA

- Pre-accessioned permanent records from legacy RMA first.
  - 25,269 emails
  - 89,577 files
  - 3.17 GB
- Created a "data dump" and complimentary HTML export (for validation purposes) to transfer records and metadata to new RMA
- Migrated data from old RMA to new RMA.
  - Over 250,000 email messages and files

### Drafted and Submitted Capstone Schedule

### Permanent

- Cut off at end of FY
- Transfer electronic records to the National Archives for pre-accessioning immediately after cut-off
- Transfer to the National Archives 15 year(s) after cutoff.



## Drafted and Submitted Capstone Schedule

## **Temporary**

- From email accounts not designated as Capstone Officials
- These records are created digitally and will not be managed in any other format
- Destroy no earlier than 7 years after capture in the electronic recordkeeping system.



## **Drafted Internal Capstone Directive**

- Explained the NARA "Capstone" approach
- Managing email Records of designated capstone officials
- Managing records captured from email accounts not designated as Capstone officials
- Capstone exceptions
  - Labeling as temporary or permanent (during Safe Harbor)
  - Non-Records
  - Email records retained with related records
- Other considerations for email records
- Maintaining records generated by this policy



### Created and Filled ERM Specialist Position

- Serves as the ERM subject matter expert for administering agency electronic recordkeeping system
- Contributes to NARA Corporate Information Management governance, strategy, and training initiatives
- Develops, coordinates, and maintains records schedules for NARA records maintained in electronic information systems
- Coordinates with records management stakeholders to assist in identifying electronic records management requirements and directly implements these requirements, as applicable, in electronic recordkeeping system(s).

### Summary

- NARA's CRO issued the Capstone Bulletin to allow a new approach to email management.
- NARA adopted a new email system (Google Mail)
- Detailed results from earlier internal studies informed requirements
- NARA implemented a Capstone approach to managing email.
- A step forward in meeting the requirements of OMB M-12-18.



### Summary

- Ultimately, NARA subscribes to a new cloud email system (Gmail)
- Uses ZL Unified Archive (ZL UA) as the official recordkeeping repository for all agency email records
- Captures and manages email electronically in compliance with <u>Section 1.2 of the Presidential Directive</u>
- Manages records prior to the ZL UA start date under previous policies.



### **Moving Forward**

- NARA submitted a Capstone records disposition schedule
- Approval of this schedule is pending, but proposes:
  - Permanent accounts (currently 48 positions):
     eventual legal transfer to NARA's archival holdings.
  - Temporary accounts (all others): minimum of 7
     year retention for all email after capture in RMA.



### **Lessons Learned**

- Explicitly include migration of existing email repositories in contracts / plans;
- Establish common understanding with vendors / contractors;
- Recognize that user communication is very important;
- Allow users extra time to manage legacy email;
- Establish Capstone records schedule and policies;
- Communicate, communicate, communicate;
- Collaborate, collaborate, collaborate



### **Panel Discussion Next**



Please hold your questions for the panel.

- Thank you!
- Susan Sullivan, CRM
   Corporate Records Management Director
   susan.sullivan@nara.gov

Tel: 301-837-2088



# Capstone and Email Management:

# **Q&A Panel Session**



