Frequently Asked Questions about the form NA-1005, *Verification for the Use of GRS 6.1, Email and other Electronic Messages Managed Under a Capstone Approach*

These FAQs should be consulted in conjunction with the instructions provided within the form NA-1005 itself.

1. Is Senior Agency Official for Records Management (SAORM) approval required on the form?

NARA previously required SAORM approval on Form NA-1005, but dropped this approval requirement in September of 2021. Agencies may collect internal concurrences if needed by their own processes.

2. Are all the fields on the "General Information" tab mandatory?

Yes, with the following exceptions:

- **Line 14, superseded form (job) number**: only required if the agency answered "yes" to line 13, "Is this form superseding a previous submission?"

- **Line 20, "additional scope comments:"** only required if the agency is not using all the items available on GRS 6.1 (items 010, 011, and 012).

3. Is the "Electronic Messages" tab mandatory?

This tab is required if the agency answered "yes" to the "General Implementation Scope" field entry (line 16) on the "General Information" tab. Those that answer "no (email only)" in this field *should not* complete this tab.

4. When is it appropriate to use subsection (b) "Permanent Legacy Records Only" within each of the 10 categories?

This section is used to identify those positions that no longer exist in the agency. It is, therefore, not intended for:

- those positions that underwent a title change
- individual positions that were split into multiple positions
- when multiple positions were merged into one.

In very rare instances, subsection (b) may also be used when the duties of a position change, resulting in the downgrading of a Capstone (permanent) position to a non-Capstone position.

Agencies should note that more detailed documentation on all permanent accounts is required at the time of legal transfer of the records to the National Archives. See FAQ for GRS 6.1 for more information.

5. Under section (b) of each category, should the positions listed be carried forward to each subsequent submission, or just new positions that fit this sub-category since the last submission?

Positions should be carried forward until all email of those positions listed has been legally transferred to the National Archives. Once all email has been transferred, the position may be dropped from the form.

6. Where do we document changes to positions?

You will document changes to positions in either subsection (a), *active permanent positions*, or subsection (b), *permanent legacy positions*, within each of the 10 categories.

See question 7 on how to best use the selections within the "summary of changes" field under subsection (a); otherwise, the scenarios below indicate whether to document the changes within subsection (a) or subsection (b):

Scenario	Where document	Example
A position no longer exists in the agency's organization in any way from a certain date forward.	Document this position in subsection (b) "Permanent Legacy Records Only" of the relevant category.	The "Director, Office of Policy Compliance" position is completely removed from the agency's organization. Functions performed by this position are not transferred to another position. The position is, therefore, appropriate for inclusion in subsection (b) of the relevant category.
A position is split into two positions. Each of the new positions takes on some of the duties of the previous one position.	Document the two new positions in subsection (a) "Active Permanent Positions" of the relevant category. Best practice is to include the previous title in parentheses next to each new position listed.	The position of "Under Secretary for Compliance and Transparency" is split into two positions: the "Under Secretary for Compliance," and the "Under Secretary for Transparency." Both positions should be listed in subsection (a) of the relevant category. Best practice is that for each, "(previously the Under

		Secretary for Compliance and Transparency") be included next to each of the two new titles.
The duties of one position are merged with the duties of another position. What was two positions is now one.	Document the new position in subsection (a) "Active Permanent Positions" of the relevant category. Best practice is that the two previous titles should be included in parentheses next to the new position title.	The two positions of "Under Secretary for Compliance" and "Under Secretary of Transparency" are merged into one new position: the "Under Secretary of Compliance and Transparency." The one new position should be listed in subsection (a) of the relevant category. Best practice is to add the parentheses "(previously the Under Secretary for Compliance and the Under Secretary for Transparency)" next to the new title entry.

7. For subsection (a), "Active Permanent Positions," what do each of the possible selections for "summary of changes from previous submission" mean, and when should they be used?

- ***No change.*** This selection will be very common. When this selection is used, it denotes that no changes have happened since the previous form was approved; if the forms were compared for these positions, they would be identical.

- ***Title change.*** This is used when a position title changes. Best practice is to indicate the previous title in parentheses. For example, "Director of Public Affairs and Outreach (previously the Director of Public Affairs)."

- ***# of accounts / positions has increased.*** Use where either the number of accounts and / or positions has increased since the last form submission. For example, if the Executive Director was previously denoted as having one account, but they now have two (such as an alias account), then use this selection to indicate the increased number of accounts.

- ***# of accounts / positions has decreased.*** Use where either the number of accounts and / or positions has decreased since the last form submission. For example, if the Executive Director was previously denoted as having two accounts, but they now have one (such as when an alias account was removed from use), then use this selection to indicate the decreased number of accounts.

- ***Position is new since last submission***. Use this selection for new positions in the agency's organization that are appropriate for inclusion within one of the 10 categories. It is for positions that did not exist when the previous form was approved.

- ***Change in category designation***. Use this selection to document when a position is being moved from one category to another. For example, a position was previously listed in category 6, but the agency determined that category 5 is more appropriate. This selection is for correcting a mistake in category designation.

- ***Reappraised as permanent (including legacy).*** Use this selection for positions that meet the definition of the category, but were erroneously left off the previous submission. This selection is used for correcting oversights related to position inclusion.

- ***Not applicable (1st submission).*** Use this selection for initial form submission (the agency has not previously submitted a form NA-1005). This selection would apply to all positions on the form.

- ***Other***. Use this selection when there is no other appropriate selection to describe the change or when there are multiple changes associated with the position. You should be prepared to summarize the changes for your NARA Appraisal Archivist.

8. Under subsection (a) of each category, what if you have more than one response to the question about "changes since last submission"?

Since Excel limits users to only one selection option, you should choose one of the following options:

- Select "other," and provide additional information to their NARA Appraisal Archivist as needed, or
- Select the option that is the "biggest change" from the previous submission (for example, a title change could be seen as more important information than a change in number of accounts).

The important thing is indicating that a change has occurred since the previous submission to help your NARA Appraisal Archivist review the new form.

9. How do we document vacant positions on the form?

Vacant positions are those that still exist in your organization but are currently unfilled. They should be treated like all other positions and be included on the form. For example, if your agency has the position "Executive Director" but it is currently unfilled, it should still be listed on the form and listed as one (1) position.

Agencies should document the period of vacancy within the transfer documentation required at the time of legal transfer of the records to the National Archives. See FAQ for GRS 6.1 for more information.

10. If an agency identifies a new position that fits one of the ten (10) permanent categories after the form has been approved, but the position is then removed from the organization before the next resubmission cycle, how does the agency document this?

The position should be included in section (b) of the relevant category in the agency's next submission in the regular submission cycle**.** If the agency prefers to not wait they may send an "ad hoc" submission outside the standard four-year cycle, pursuant to NARA Bulletin 2022-002.

11. Why do we need to provide an URL to an Agency Organization Chart on the "General Information Tab"?

NARA Appraisal Archivists use the organizational chart to validate the NA-1005. The organization chart needs to be up-to-date and sufficiently detailed to complete this work. The URL for a current organization chart available on a public facing website can be provided via the form. If this is not available, then agencies should submit an organization chart annotated with the Capstone categories to their appraisal archivist.

12. Can my agency submit more than one form per record group (RG)?

Yes. If your agency is large and has a complex organizational structure, you may submit multiple forms for the same RG. This is sometimes appropriate for agencies with large Under Secretary or Bureau levels. Agencies should state which part of the organization the form covers in the "additional scope" statement on the "General Information" tab. We also advise that agencies discuss submitting multiple forms with their NARA Appraisal Archivist before submission.

13. Can an agency alter the form to report additional information such as create new fields, delete tabs, add tabs, etc.?

No. The form NA-1005 is a formal NARA form, and may not be altered. If you have supplemental information to add, you may send it to your NARA Appraisal Archivist as part of the form review process.