

## 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 obtaining approval of [NARA form 1005 \(NA-1005\), Verification for Implementing GRS 6.1](#). Agencies are required to obtain approval of a resubmitted NARA form 1005 at least every four years. Additional information, including a link to the form, may be found in the FAQs 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, 1) The range of implementation in an organization (agency-wide, specific office, etc.); and 2) The range of implementation regarding email technology and system platforms. Brief information on the scope of an agency's Capstone implementation is also required on NA-1005.

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 received (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. Agencies may develop their own policies and procedures for the culling of temporary accounts.

### 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 required positions in item 010, use shorter retention lengths for temporary records, or extend the time frame for transfer of permanent records.

Agencies have discretion to designate individual email messages, with their attachments as permanent, or as longer-term temporary records that should be cross-filed elsewhere pursuant to agency policies and business needs.

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         |
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| 010  | <p><b>Email of Capstone officials.</b></p> <p>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 1005 (NA-1005), <i>Verification for Implementing GRS 6.1</i>, and <i>must</i> 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 Armed Forces serving in comparable position(s);</li> <li>3. Deputies of all positions in categories 1 and 2, and/or their equivalent(s);</li> <li>4. Staff assistants to those in categories 1 and 2, such as special assistants, confidential assistants, military assistants, and/or aides;</li> <li>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);</li> <li>6. Directors of significant program offices, and/or their equivalent(s);</li> <li>7. Principal regional officials, such as Regional Administrators, and/or their equivalent(s);</li> </ol> | <p><b>Permanent.</b> Cut off in accordance with agency's business needs. Transfer to NARA 15-25 years after cutoff, or after declassification review (when applicable), whichever is later.</p> | <p>DAA-GRS-2014-0001-0001</p> |

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| <p>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.;</p> <p>9. Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions); and</p> <p>10. Additional roles and positions that predominantly create permanent records related to mission critical functions or policy decisions and/or are of historical significance.</p> <p>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.</p> <p>This item <i>must</i> include all existing legacy email accounts that correlate to the roles and positions described above.</p> <p>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. Email from personal or non-official email accounts in which official agency business is conducted is also included. A complete copy of these records must be forwarded to an official electronic messaging account of the officer or employee not later than 20 days after the original creation or transmission of the record.</p> <p>Please consult NA-1005, for more information on which positions are included within each category.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> <p><b>Note 1:</b> 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.</p> |  |  |
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|     | <p><b>Note 2:</b> 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>   |   |  |                        |
| 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>Note:</b> Agencies <i>only</i> using item 011 and/or item 012 of this GRS may not dispose of any email of officials 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 NA-1005 is still required in these instances to document those being exempted from Capstone.</p> | <p><b>All others except those in item 012.</b><br/>Includes positions and email not covered by items 010 or 012 of this schedule.</p> <p>This item applies to the majority of email accounts/users within an agency adopting a Capstone approach.</p>   | <p><b>Temporary.</b><br/>Delete when 7 years old, but longer retention is authorized if required for business use.</p> | DAA-GRS-2014-0001-0002 |
| 012 |  | <p><b>Support and/or administrative positions.</b><br/>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><b>Temporary.</b><br/>Delete when 3 years old, but longer retention is authorized if required for business use.</p> | DAA-GRS-2014-0001-0003 |