

AGENCY NAME

Transmittal Memo

DATE: agencyname801_2-11-14_draft.docx

TO: All Staff

SUBJECT: AGENCY POLICY 801 – Capstone Email Records Management Policy

Purpose: This policy implements the “Capstone” approach for managing AGENCY email records (including email messages and attachments, calendar appointments, tasks, and chat transcripts.)

Background/significant changes: This policy directly supports Goal 1 of [OMB M-12-18](#), “Managing Government Records Directive,” which requires that, “[b]y December 31, 2016, Federal agencies must manage all email records in an electronic format. Email records must be retained in an appropriate electronic system that supports records management and litigation requirements including the capability to identify, retrieve, and retain the records for as long as they are needed.” This policy also addresses recordkeeping requirements when using personal or non-AGENCY communications tools to conduct AGENCY business.

Capstone should improve email records management by simplifying the records schedule for email, and automating email capture and management. Capstone should greatly reduce the records management burden on individual email users by:

- basing email records retention on the mailbox owner’s role in AGENCY rather than on the content of each email record. and
- automating email capture and management according to the simplified, role-based Capstone retention periods.

AGENCY users will still have to understand that the materials they create and receive day-to-day may or may not be records, whether email or not, and to use tools in the email system to weed out non-records (including personal emails) before capture as an official record.

AGENCY will provide guidance and training on how to use both the email system and the electronic recordkeeping system. This will include identifying record and non-record email, weeding out non-record email, and other filing requirements and responsibilities (such as cross-filing email with related case files, *etc.*).

Email records captured and maintained under the Capstone approach will be maintained as unscheduled records until the new Capstone records schedule is approved. When approved,

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AGENCY will implement retention and destruction of email records under Capstone, according to the approved records schedule.

Canceled policy: Interim Guidance 12-345, Handling Email Documents that are Federal Records, and 810-1, Disposition of E-Copies of Federal Records Created and Maintained by AGENCY

Effective date: This policy is effective on the date of signature.

Contact information: Contact Records Management [RM] within the Office of the Chief Information Officer.

Jane Doe
Deputy Secretary of AGNECY

Attachment

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AGENCY POLICY 800

SUBJECT: AGENCY NAME “Capstone” Email Records Management Policy

800.1 Purpose

This directive implements the “Capstone” approach to email records management and identifies its authorities, scope, objectives, and definitions.

801.2 Authorities

- a. 44 U.S.C. Chapters 21, 29, 31, and 33
- b. 36 CFR Chapter XII, Subpart B – Agency Records Management Responsibilities
- c. 36 CFR Chapter XII, Subparts B and C – Electronic Records Management
- d. OMB M-12-18, Managing Government Records Directive

801.3 Scope and Objectives

- a. The Capstone policy applies to email records created or received after January 21, 2013. AGENCY email records are defined as email messages with attachments, calendar appointments, tasks, and chat transcripts created and received in the same system as email messages (e.g., EMAIL CLIENT Apps).
- b. Email messages sent or received before January 22, 2013, are convenience copies unless manually categorized in AGENCY’s electronic recordkeeping system (e.g., SYSTEM NAME) under Capstone (see AGENCY 801.4).
- c. This policy implements OMB M-12-18, Part I, Goal 1.2, AGENCY (and all federal agencies) will “manage all email records in an appropriate electronic system that supports records management and litigation requirements (which may include preservation-in-place models), including the capability to identify, retrieve, and retain the records for as long as they are needed.”
- d. This policy implements the guidance in NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records. It aims to improve AGENCY email records management through simplifying and automating it in an electronic recordkeeping system. Capstone provides the simplification that allows the automated electronic recordkeeping system to more effectively manage AGENCY’s email records.

NOTE: Currently, Capstone applies only to AGENCY email records, as defined above. All other records, either paper or electronic, are governed by the AGENCY Records Schedule.

801.4 Explanation of the AGENCY “Capstone” Approach

Under the Capstone approach, AGENCY manages email records based on the role of the email account user and/or office rather than on the content of each email record. Email records are captured and managed according to user role using the following retention approach:

- a. **Email Records of Designated Capstone Officials:** Email records from the email accounts of officials whose role within the agency predominantly creates permanent records: AGENCY will retain permanent email records according to the approved Capstone records schedule and then accession them into the National Archives of the United States. For AGENCY, this applies to the email records of designated AGENCY Capstone Officials. The AGENCY General Counsel and AGENCY Records Management maintain the official list of capstone officials’ email accounts.
- b. **Email Records Captured from Email Accounts Not Designated as Capstone Officials:** Email records of all other AGENCY email account users will be retained according to the Capstone records schedule, and destroyed within the electronic recordkeeping system.
- c. **Capstone exceptions:**
 - (1) **Capstone Permanent**
 - (a) **If AGENCY designates your account as Capstone Permanent (Your email records are permanent records),** you may manually designate email records that are non-permanent as Capstone Temporary (e.g., email messages of a transitory, non-substantive nature).
 - (b) **If AGENCY does Not designate your account as Capstone Permanent,** but you send or receive permanent email records, you may manually designate them as Permanent. Account users who create a large volume of permanent email records should contact their Information Management Officer (IMO) to determine whether, based on their role, AGENCY should re-designate their email account as Capstone Permanent.
 - (2) **Non-Records:** While not mandatory, all AGENCY staff may designate non-records as such in EMAIL CLIENT so that the recordkeeping system will not capture and manage them. Non-records include: non-business related, personal, and “broadcast” messages (e.g., AGENCY messages to all staff), and advertisements. One captured in the electronic recordkeeping system, AGENCY staff may re-categorize items to non-record, as appropriate during the safe harbor period.
 - (3) **Email records retained with related records:** When business needs require email records to be retained with other records (such as part of a case file) in another recordkeeping system, you should manage these

records outside of the electronic recordkeeping system and retain them according to the appropriate AGENCY Records Schedule series instructions. Capstone does not replace existing business practices that require email messages and other related records to be retained together in established recordkeeping systems. AGENCY organizations should evaluate Capstone in terms of their existing business processes. **Email records in the electronic recordkeeping system created or received before January 22, 2013**, and not otherwise captured in a recordkeeping system, may be manually categorized and managed as records under Capstone.

801.5 Email Records Staff Create Using Personal or Non-AGENCY Communications Tools

AGENCY's new EMAIL CLIENT and SYSTEM NAME systems help to ensure that AGENCY email records are captured and maintained under Capstone. HOWEVER, if non-AGENCY communications tools are used to conduct AGENCY business (personal email accounts, personal Facebook messages or posts, Twitter, or even phone conversations) users must document the information communicated as records and ensure they are captured and managed according to agency recordkeeping practices:

- a. Communications related to AGENCY business that staff send or receive via a personal account may satisfy the definition of a "record" as delineated in 44 U.S.C. 3301.
- b. When you determine that a communication is business-related you must:
 - (1) Capture the communication in an email message (e.g.; by copying or forwarding a message , cutting and pasting text and/or graphics, attaching a file, capturing a screen shot, documenting a verbal conversation in writing), and send it to your AGENCY email address.
 - (2) Maintain the communication in accordance with AGENCY's email management policies.
- c. To be safe, don't concern yourself about whether these communications are transitory (not appropriate for preservation beyond 180 days). If they are business-related, keep them.

801.7 Maintaining Records Generated by this Policy

- a. Records created by Records Management.
 - (1) Records documenting the planning, managing and evaluating of the program: maintain records under File No. 241-1a.
 - (2) Records documenting the development of records management policy: maintain records under File No. 241-1b.

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- b. Records created during program implementation: maintain records under File No. 241-3a, b, or c as appropriate.
- c. Records created by the Office of the Archivist and the COO: maintain records under File No. 108.
- d. Records created by executive records management stakeholders related to AGENCY's own records management policy development and agency-wide implementation: maintain records under File No. 109 as appropriate.
- e. Records created by role-based records management stakeholders, supervisors, IMOs and RCs:
 - (1) Regional Records facilities with the exception of NPRC: maintain records under File No. 266.
 - (2) All other organizations: maintain records under File No. 205.

For more specific details on these basic functions (creating and using labels in EMAIL CLIENT, installing and using the electronic recordkeeping system), as well as Capstone exceptions, consult the [AGENCY Records Management Capstone page](#) at [AGENCY@Intranet](#).