

Verification for the Use of GRS 6.1, Email and other Electronic Messages Managed Under a Capstone Approach

SECTION A: GENERAL BACKGROUND INFORMATION (GRS 6.1, item 010)

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) applicable record group number; 3) documentation on whether the agency will also be applying this GRS to the other types of electronic messages covered in the scope of the GRS; 4) selection of which GRS 6.1 items the agency is proposing to use; and 5) information on implementation scope, such as whether agency-wide or limited to a specific component/office, as well as information on legacy email.

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 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. As a general rule, each record group will require a separate form.

THIS SECTION FOR NARA USE ONLY	
Job Number	GRS-6-1-0266-2024-0002
Received Date	7/2/2024
Approval Date (date, name, title)	07/31/2024, William Fischer, Acting Chief Records Officer

BELOW TO BE COMPLETED BY SUBMITTING AGENCY	
Name of Agency	Securities and Exchange Commission

Record Group Number	0266
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Is there a classified version of this schedule? (select from drop-down menu)	No
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Is this form superseding a previous submission? (select from drop-down menu)	Yes
If so, input job number (GRS-6-1-XXXX-YYYY-)	GRS-6-1-0266-2024-0001

GRS Implementation Scope. Will the agency also be applying this GRS to other types of electronic messages as defined in the GRS scope? NOTE: See the GRS scope for electronic message inclusions and exclusions. (select from drop-down menu)	Yes
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GRS Items Proposed for Use (select from drop-down menu)	All items
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<p>Additional Scope Comments. If an agency did not check “all” under the “GRS 6.1 item(s) proposed for use” section, please summarize how other records are to be managed. If applicable, please include in this section all other RGs for which your agency is submitting a separate form (for example, “The department will also be submitting forms for the following additional components: [list of components, with their record group number].”</p>	
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<p>Cutoff Instruction (select from drop-down menu)</p>	<p>Cutoff at the end of the employee tenure</p>
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<p>Transfer Instruction (select from drop-down menu)</p>	<p>15 yrs or after declass review</p>
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<p>Legacy Scope. Agencies using this GRS are expected to apply the items being used to all legacy (existing) records. Please provide any general information on legacy records below (for example, “no legacy records exist for this agency, as traditional records management with a print-and-file policy was enforced prior to Capstone adoption” or “agency will be including legacy records for all items being used, dating back to approximately 2010.”)</p>	<p>The SEC identified and archived existing email accounts of departed staff who map to Capstone designated positions. These accounts are managed in the SEC’s Enterprise Vault. In addition, legacy Capstone email messages are associated with case/project files in both paper and electronic formats per the SEC’s previous records management policies. Pre-2008 email messages were captured via print-to-file processes in compliance with SEC’s previous email management policy.</p>
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<p>Do any of the Capstone officials proposed on this list have accounts on security classified networks or systems? (select from drop-down menu)</p>	<p>No</p>
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Do any of the Capstone officials proposed on this list have secondary or alias accounts, regardless of classification? (select from drop-down menu)	Yes
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URL to Agency Organization Chart	https://www.sec.gov/files/secorg.pdf
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Agency Contact Information	
Name of Person to Contact with form questions	Christina DeBenedictis
Phone	202-551-6509
Email	debenedictisc@sec.gov

Agency Records Officer	
Name of Agency Records Officer	Curt Francisco
Phone	202-551-6126
Email	FranciscoC@sec.gov
By checking this box, you certify that you are	

THIS SHEET AUTO-POPULATES. DO NOT INPUT DATA.

	Total Positions	Total Accounts
Category 1	5	11
Category 2	0	0
Category 3	0	0
Category 4	28	28
Category 5	5	5
Category 6	23	23
Category 7	11	11
Category 8	5	5
Category 9	0	0
Category 10	52	52
TOTALS	129	135

Form NA-1005

Verification for the Use of GRS 6.1, Email and other Electronic Messages Managed Under a Capstone Approach

SECTION B: Electronic Messages

Those agencies that are also using this GRS for other types of electronic messages must also complete the "Electronic Messages" tab. Specifically, those agencies that selected "yes" for "GRS Implementation Scope" on the "General Information" tab are required to complete that section. If an agency answered "no," then this tab may be skipped.

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 section is broken down to correspond to the ten categories provided under item 010.

Some agencies may not have any positions for certain categories. Please explain why, under each applicable category. (For example, "We do not have any regional administrators" or "These positions are included under another submission" or "all the positions in this category are already covered in other categories.") Please refer to GRS 6.1, the FAQs about GRS 6.1, and the definitions provided within each category of this form for additional information on which positions must be included in a Capstone approach.

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. NOTE: the list should be of positions or roles (for example, "Secretary"), not specific individual names, email addresses, or other identifiers (for example, "John Smith" or "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.

Each category (1 through 10) as defined by GRS 6.1, item 010, has its own tab within this workbook. Each tab has three parts: Part (a) for ACTIVE positions -- those positions that are to remain as permanent; Part (b) LEGACY RECORDS ONLY positions -- those positions which are no longer permanent from a certain point forward (either because they have been eliminated from the organization, or the duties changed making the position inappropriate for inclusion as permanent in any category), but still have permanent legacy email / electronic messages; and Part (c) for REMOVED positions -- those positions previously approved as permanent, but are now are proposed as temporary for both day-forward and legacy records.

(a) ACTIVE PERMANENT POSITIONS, DAY-FORWARD AND LEGACY. List ALL those positions that: 1) have not changed since any previously approved submission; 2) are new to this category, either because the position is new to the agency, the position has been reappraised as having permanent email / electronic messages, or this is the agency's first submission; 3) have been changed in regard to position title, number of accounts, and/or number of positions; or 4) are being moved from another permanent category to this one. This section will include all roles and positions that have permanent email / messages, both day-forward and legacy. The "number of positions" will usually be "1," but may be higher for those positions being condensed / rolled-up, such as "all Under Secretaries," or "all Board Members." The "number of accounts" is a total of all accounts for the corresponding "number of positions" -- for example, if there are 2 Under-Secretary positions listed, and each has 3 assigned email accounts, the total accounts for this field would be 6. NOTE: in cases where the agency is also applying the GRS to the other types of electronic messages included in the scope of the GRS, the agency is not required to reflect such in the number of accounts field; NARA acknowledges that this information would be difficult to ascertain for the purposes of this form. This information is more appropriate for inclusion within the transfer paperwork (documentation) required at the time records are transferred to the legal custody of NARA.

NOTATING THE CHANGES: The "Summary of Changes from previous submission" field includes a drop-down list of possible changes that may have occurred since the previous submission. This field helps facilitate review of the new submission by NARA. Please select the scenario that is most appropriate. Most positions being carried forward from a previously approved form can likely be noted as "No change." Other changes may include: number of positions increased / decreased (generally for those position titles that are rolled-up); number of accounts increased / decreased; the title of the position has changed; the position is new to the agency (and thus was not on previously approved forms); the position has been moved from one category to another (for example, a position was approved as Category 2 in a previous submission, but was deemed more appropriate for a different category; or the position has been reappraised as permanent (was not deemed appropriate for inclusion on previously approved forms, but now is). If none of the options apply, please select "other" and be prepared to discuss the changes with your NARA Appraisal Archivist during review of the form.

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA. Select the most appropriate option from the drop-down list for "Summary of Changes from previous submission." Notate the calendar year that that permanent records for the related position have ceased. This section documents -- in these cases -- that even though the position has been eliminated from the active permanent list, there will still exist legacy permanent records to be managed.

(c) REMOVED POSITIONS – CHANGE FROM PERMANENT TO TEMPORARY. This list is for those positions that were approved as permanent on a previous form, but are now proposed as temporary. These are positions now deemed inappropriate for inclusion in any category under GRS 6.1, item 010. In these cases all records covered by the GRS, both day-forward and any existing legacy records, may be managed as temporary upon approval of this form.

TOTALS. The "totals" tab of this workbook auto-totals the number of all permanent positions and accounts for each of the 10 category tabs.

ELECTRONIC MESSAGES: THIS SECTION IS ONLY REQUIRED FOR THOSE AGENCIES USING GRS 6.1 FOR OTHER TYPES OF ELECTRONIC MESSAGES: SPECIFICALLY, THOSE AGENCIES THAT SELECTED "YES" FOR "GRS IMPLEMENTATION SCOPE" ON THE "GENERAL INFORMATION" TAB.

Below are the three categories of electronic messages included in the scope of GRS 6.1. Please select "yes" if your agency creates any of the message types below. Please consult FAQ #11 for information on what types of messages are covered under each category. **REMINDER: agencies choosing to use this GRS for electronic messages must apply it to all messages the agency creates that are included within the scope of the GRS. The list below is used to indicate which message types the agency creates.**

A: Messages affiliated with email system chat or messaging functions, and where the messages are managed	Yes
B: Messages from messaging services provided on mobile devices. (select "yes" or "no" in the box to the right)	Yes
C: Messages from messaging services on third-party applications. (select "yes" or "no" in the box to the right)	Yes

REQUIRED. Please provide additional scope comments below. This may include, for example, whether any of the ten categories are not creating any of these records at all; and / or list some examples of the types of records being created. If any of the ten categories are unique in the creation / management of these records, you may notate it here. *Sample statement* : "All positions represented on this form are using general chat / text features affiliated with our email platform; all positions in categories 1 through 4 are using chat features on personal devices; and only those positions in category 10 are using third-party application (SIGNAL)."

All positions represented on this form have access to agency-approved chat and electronic messaging applications. Electronic messages created on mobile devices were only created from 11/08/2022 - 03/29/2024, and due to a change in SEC policy staff are no longer permitted to utilize texting/chatting on mobile devices.

Category 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 accounts); some agencies, such as Commissions and Boards, may have multiple positions in the category. *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

Add Row

(a) ACTIVE PERMANENT POSITIONS, DAY-FORWARD AND LEGACY. List ALL those positions that: 1) have not changed since any previously approved submission; 2) are new to this category, either because the position is new to the agency, the position has been reappraised as having permanent email / messages, or this is the agency's first submission; 3) have been changed in regard to position title, number of accounts, and/or number of positions; or 4) are being moved from another permanent category to this one. This section will include all roles and positions that have permanent email / messages, both day-forward and legacy.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Chair	1	3	# of accts/positions increased
Commissioner	4	8	# of accts/positions increased
TOTALS:	5	11	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	5	11		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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. *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist.")

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POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Not applicable; no positions in this category exist			No change
TOTALS:	0	0	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	0	0		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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. *If no positions are identified, please briefly explain why (for example, "Not applicable, no positions in this category exist.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

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POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Not applicable; no positions in this category exist			No change
TOTALS:	0	0	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	0	0		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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, such as, 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. *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist" or "Not applicable; All positions accounted for in other categories.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

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POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Chief Operating Officer	1	1	No change
Chief Information Officer	1	1	No change
Chief Financial Officer	1	1	No change
Chief Data Officer	1	1	Position is new since last submission
Chief Risk Officer	1	1	Position is new since last submission
TOTALS:	5	5	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	5	5		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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. *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist.")

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POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Director, Division of Corporation Finance	1	1	No change
Director and Chief Economist, Division of Economic and Risk Analysis	1	1	No change
Director, Division of Enforcement	1	1	No change
Director, Division of Examinations	1	1	No change
Director, Division of Investment Management	1	1	No change
Director, Division of Trading and Markets	1	1	No change
Chief Accountant, Office of the Chief Accountant	1	1	No change
Director, Office of Credit Ratings	1	1	No change
Director, Office of International Affairs	1	1	No change
Director, Office of Investor Education and Advocacy	1	1	No change
Director, Office of Legislative and Intergovernmental Affairs	1	1	No change
Director, Office of Minority and Women Inclusion	1	1	No change
Director, Office of Municipal Securities	1	1	No change
Director, Office of Public Affairs	1	1	No change
Investor Advocate, Office of the Investor Advocate	1	1	No change
Secretary of the Commission, Office of the Secretary	1	1	No change
Director, Office of Advocate for Small Business Capital Formation	1	1	Position is new since last submission
Director, Strategic Hub for Innovation and Financial Technology	1	1	Position is new since last submission
Director, Office of Support Operations	1	1	Reappraised as permanent (including legacy)
Director, EDGAR Business Office	1	1	Position is new since last submission
Director, Office of Acquisitions	1	1	Reappraised as permanent (including legacy)
Director, Office of Equal Employment Opportunity	1	1	Reappraised as permanent (including legacy)
Director, Office of Human Resources	1	1	Reappraised as permanent (including legacy)
TOTALS:	23	23	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of	Number of	Summary of Changes from previous submission (select from drop-	Calendar year position
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	23	23		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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). *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist" or "Agency has no regional presence with these types of positions.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

Add Row

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POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Regional Director	11	11	No change
TOTALS:	11	11	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	11	11		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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. *If no positions are identified, please briefly explain why (for example, "Not applicable; no positions in this category exist.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

Add Row

(a) ACTIVE PERMANENT POSITIONS, DAY-FORWARD AND LEGACY. List ALL those positions that: 1) have not changed since any previously approved submission; 2) are new to this category, either because the position is new to the agency, the position has been reappraised as having permanent email / messages, or this is the agency's first submission; 3) have been changed in regard to position title, number of accounts, and/or number of positions; or 4) are being moved from another permanent category to this one. This section will include all roles and positions that have permanent email / messages, both day-forward and legacy.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Chief of Staff	1	1	No change
Senior Advisor	1	1	No change
General Counsel	1	1	No change
Inspector General	1	1	No change
Ethics Counsel	1	1	Position is new since last submission
TOTALS:	5	5	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	5	5		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

Category 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. *If no positions are identified, please briefly explain why (for example, "Not applicable; all PAS positions accounted for in other categories.")

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

Add Row

(a) ACTIVE PERMANENT POSITIONS, DAY-FORWARD AND LEGACY. List ALL those positions that: 1) have not changed since any previously approved submission; 2) are new to this category, either because the position is new to the agency, the position has been reappraised as having permanent email / messages, or this is the agency's first submission; 3) have been changed in regard to position title, number of accounts, and/or number of positions; or 4) are being moved from another permanent category to this one. This section will include all roles and positions that have permanent email / messages, both day-forward and legacy.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Not applicable; all PAS positions accounted for in other categories			No change
TOTALS:	0	0	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)	Calendar year position eliminated from agency or no longer creates these records
TOTALS:	0	0		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	0	0		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE

CATEGORY 10) Additional roles and positions that predominantly create permanent records related to mission critical functions or policy decisions and/or are of historical significance. These 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 category is for those roles and positions that are appropriate for permanent retention, but not captured in the other nine (9) categories.

NOTE: To add additional rows to any section below, click the "Add Row" button to the right; you will be prompted to input the row number where you would like row(s) to be added BELOW the selected row. You will then be prompted to input the number of additional rows you would like added.

Add Row

(a) ACTIVE PERMANENT POSITIONS, DAY-FORWARD AND LEGACY. List ALL those positions that: 1) have not changed since any previously approved submission; 2) are new to this category, either because the position is new to the agency, the position has been reappraised as having permanent email / messages, or this is the agency's first submission; 3) have been changed in regard to position title, number of accounts, and/or number of positions; or 4) are being moved from another permanent category to this one. This section will include all roles and positions that have permanent email / messages, both day-forward and legacy.

POSITION TITLE / ROLE	Number of Positions	Number of Accounts	Summary of Changes from previous submission (select from drop-down menu)
Deputy Director, Division of Corporation Finance	2	2	No change
Chief Counsel, Division of Corporation Finance	1	1	No change
Chief Accountant, Division of Corporation Finance	1	1	No change
Managing Executive, Division of Corporation Finance	1	1	No change
Deputy Director and Deputy Chief Economist, Division of Economic and Risk Analysis	2	2	No change
Chief Counsel, Division of Economic and Risk Analysis	1	1	No change
Managing Executive, Division of Economic and Risk Analysis	1	1	No change
Deputy Director, Division of Enforcement	1	1	No change
Chief Counsel, Division of Enforcement	1	1	No change
Managing Executive, Division of Enforcement	1	1	No change
Deputy Director, Division of Investment Management	1	1	No change
Chief Counsel, Division of Investment Management (previously Associate Director and Chief Counsel, Division of Investment Management)	2	2	Title change
Managing Executive, Division of Investment Management (previously Managing Executive and Associate Director, Division of Investment Management)	1	1	Title change
Deputy Director, Division of Trading and Markets	2	2	No change
Managing Executive, Division of Trading and Markets	1	1	No change
Deputy Director, Division of Examinations (previously Deputy Director, Office of Compliance Inspections & Chief Counsel, Division of Examinations (previously Chief Counsel and Associate Director, Office of Compliance	2	2	Title change
Chief Counsel, Division of Examinations (previously Chief Counsel and Associate Director, Office of Compliance	1	1	Title change
Managing Executive, Division of Examinations (previously Managing Executive, Office of Compliance	1	1	Title change
Chief Administrative Law Judge	1	1	No change
Administrative Law Judge	2	2	# of accts/positions decreased
Chief Counsel, Office of the Chief Accountant	1	1	No change
Deputy Director, Office of the Credit Ratings	1	1	No change
Deputy General Counsel	4	4	Other
Solicitor, General Counsel	1	1	Position is new since last submission
Deputy Director, Office of International Affairs	1	1	No change
Deputy Director, Office of Investor Education and Advocacy	1	1	No change
Chief Counsel, Office of Investor Education and Advocacy	1	1	No change
Deputy Director, Office of Minority and Woman Inclusion	1	1	Position is new since last submission
Senior Counsel, Office of Minority and Woman Inclusion	1	1	No change
Deputy Director, Office of Municipal Securities	1	1	No change
Senior Counsel, Office of Municipal Securities	1	1	No change
Deputy Director, Office of Public Affairs	1	1	No change
Deputy Secretary of the Commission, Office of the Secretary	1	1	# of accts/positions decreased
Counsel to the Chief Operating Officer	1	1	No change
Deputy Director, Office of Legislative and Intergovernmental Affairs	1	1	# of accts/positions decreased
Senior Counsel, Office of Legislative and Intergovernmental Affairs	1	1	No change
Managing Executive, Office of Information Technology	1	1	Position is new since last submission
Managing Executive, Office of the Managing Executive for Small Offices	1	1	Position is new since last submission

Managing Executive, Office of the Credit Ratings	1	1	Change in category designation
Managing Executive, Office of the General Counsel	1	1	Position is new since last submission
Chief Counsel, Office of Information Technology	1	1	Position is new since last submission
TOTALS:	50	50	

(b) PERMANENT LEGACY RECORDS ONLY. List ALL positions that: 1) no longer exist (have been eliminated from the agency) but still have legacy records that need to be managed as permanent; or 2) are being reappraised as temporary for a certain date forward, but legacy records will remain permanent. This section will include all roles and positions that have legacy permanent records to manage, but no permanent records from a certain date forward. Roles / positions in this section may be dropped from this form after the final transfer of all permanent legacy records to NARA.

POSITION TITLE / ROLE	Number of	Number of	Summary of Changes from previous submission (select from drop-	Calendar year position
Deputy Chief Operating Officer	1	1	Position removed from organization and legacy email remains	2018
Associate Director, Division of Economic Risk Analysis	1	1	Position removed from organization and legacy email remains	
TOTALS:	2	2		
TOTALS OF SECTIONS A and B (all Position titles / Roles with permanent email / messages)	52	52		

(c) REMOVED POSITIONS - CHANGE FROM PERMANENT TO TEMPORARY. List ALL positions that: 1) have been REMOVED from this category due to being reappraised as temporary since the last form NA-1005 submission, so that both day-forward and legacy records will be temporary. This section will include all roles and positions that were on previously approved forms as permanent, but have NO permanent email / messages, whether day-forward or legacy. These positions should only be listed on the submission that provides notification of the change from permanent to temporary; they may be removed from future submissions.

POSITION TITLE / ROLE