

## GENERAL RECORDS SCHEDULE 6.1:

### Email and Other Electronic Messages 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 and Other Electronic Messages 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. Agencies must also incorporate this GRS into agency records management implementation tools, such as manuals and file plans. Agencies adopting a Capstone approach should consult other resources related to email and electronic message management, specifically the Capstone approach available on NARA's [email management page](#).

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 NA-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

This GRS provides disposition authority for email records and certain types of electronic messages. Agencies using this GRS must apply it to email records, but may choose to also apply it to the other allowable types of electronic messages outlined below; this must be documented on the NA-1005. Agencies wishing to schedule electronic messages outside the scope of this GRS may submit an agency-specific schedule proposing a different scope.

#### Email

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 and tasks.

#### Other Types of Electronic Messages

The GRS does not cover all types of electronic messages. Agencies may choose to use this GRS for instant messages, text messages, and chat messages that serve a similar purpose as email to facilitate communication and information sharing. This includes:

- messages affiliated with email system chat or messaging functions, and where the messages are managed independently from the email;
- messages from messaging services provided on mobile devices; and
- messages from messaging services on third-party applications.

Exclusions to all items below:

- messages affiliated with social media accounts/social media direct messaging services;
- messages affiliated with messaging services provided on video conferencing applications and services;
- voice mail (or similarly recorded) messages;
- messages affiliated with collaboration platforms; and
- messages from messaging systems that are ancillary to the purpose of a larger system (for example, a chat function built into a procurement system).

These records still require NARA-approved disposition authority but are not covered under this GRS. See the GRS 6.1 FAQ for specific examples of the inclusions and exclusions.

### **Additional Scope**

Each agency is responsible for determining the scope of implementation when using Capstone, including, 1) whether implementation is to include only email, or to also include other types of electronic messages; 2) The range of implementation in an organization (agency-wide, specific office, etc.); and 3) the range of implementation regarding email and/or other types of electronic messaging technology and system platforms. Brief information on the scope of an agency's Capstone implementation is also required on the NA-1005.

Agencies are also responsible for defining (and documenting through policy) the official recordkeeping version of email and/or other types of electronic messages to be managed under a Capstone approach, especially when records are captured or retained in multiple locations (e.g., an email archive vs. the live system). Agencies will need to determine the appropriate disposition for other versions of email and other types of records, whether disposable under GRS 5.1, item 020, or as non-record.

Agencies are expected to apply documented selection criteria to cull the records 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, message blasts received (such as agency-wide communications), and personal materials (such as emails or messages 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 records are covered by another NARA-approved disposition authority. Agencies NOT managing any of their email or other types of electronic messages under the Capstone approach are still responsible for managing these records 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 who wish to use Capstone for a broader range of electronic messages, specifically those excluded from this GRS, may also submit an agency-specific schedule.

Item	Records Description	Disposition Instruction	Disposition Authority
010	<p><b>Email and other electronic messages of Capstone officials.</b></p> <p>Capstone Officials are senior officials designated by account or position level. This may be by email addresses, whether the addresses are based on an individual's name, title, a group, or a specific program function, and/or by phone number or other identifier for other types of electronic messages. 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> <li>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.;</li> <li>9. Roles and positions not represented above and filled by Presidential Appointment with Senate Confirmation (PAS positions); and</li> </ol>	<p><b>Permanent.</b></p> <p>Cutoff and transfer in accordance with the agency's approved NA-1005, <i>Verification for Implementing GRS 6.1</i>. This will be between 15 and 30 years, or after declassification review (when applicable), whichever is later.</p>	<p>DAA-GRS-2022-0006-0001</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 item covers emails and/or other types of electronic messages of officials captured during their tenure as a Capstone official only. Therefore, records created prior to their designation as a Capstone official (e.g., prior to their promotion/rotation into a Capstone position) are excluded and should be disposed of with other NARA-approved disposition authorities, including - but not limited to - items 011 and 012 of this schedule.</p> <p>This also includes those officials in an acting capacity for any of the above positions longer than 60 days. Agencies may also include individual emails and/or other types of electronic messages from otherwise temporary accounts appropriate for permanent disposition in this category.</p> <p>This item <i>must</i> include all existing legacy email and/or other types of electronic messages that correlate to the roles and positions described above.</p> <p>If a Capstone official has more than one agency-administered 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 and/or other types of messages regardless of the address names and/or phone number(s) used by the Capstone official for agency business, such as nicknames or office title names. Email to or from personal or non-official email and/or other messaging accounts in which official agency business is conducted is also included – a complete copy of these records must be copied or 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 the 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>Exclusions:</b> see exclusions under the GRS Scope section above.</p> <p><b>Notes:</b></p> <ol style="list-style-type: none"><li>1. 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</li></ol>		
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	<p>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> <p>2. 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 and other types of electronic messages of Non-Capstone officials.</b></p> <p>Email and/or other types of electronic messages of all other officials, staff, and contractors not included in item 010.</p> <p><b>Note:</b> Agencies <i>only</i> using item 011 and/or item 012 of this GRS may not dispose of any records of officials in item 010, Email and other electronic messages 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>Agencies have discretion to designate individual email messages and/or other types of electronic 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.</p>	<p><b>All others except those in item 012.</b></p> <p>Includes positions and records not covered by items 010 or 012 of this schedule.</p> <p>This item applies to the majority of email and other messaging accounts/users within an agency adopting a Capstone approach.</p> <p>Not media neutral; applies to records managed in an electronic format only.</p> <p><b>Exclusions:</b> see exclusions under the GRS Scope section above.</p>	<p><b>Temporary.</b></p> <p>Delete when 7 years old, <del>but longer retention is authorized if required for business use.</del></p>	DAA-GRS-2022-0006-0002
012		<p><del><b>Support and/or administrative positions.</b></del></p> <p><del>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.</del></p> <p><del>Not media neutral; applies to records managed in an electronic format only.</del></p> <p><del><b>Exclusions:</b> see exclusions under the GRS Scope section above.</del></p>	<p><del><b>Temporary.</b></del></p> <p><del>Delete when 3 years old, but longer retention is authorized if required for business use.</del></p> <div style="border: 2px solid red; padding: 5px; margin-top: 10px;"> <p><b>Utilize item 011 for all employees other than approved Capstone Officials (item 010)</b></p> </div>	DAA-GRS-2022-0006-0003