



# CAPSTONE AS A TOOL FOR EMAIL RECORDS MANAGEMENT

WHITEPAPER

Best practices for electronic management of permanent and temporary email records in compliance with Presidential Memorandum M-12-18.

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## Introduction & Background

Subsequent to Presidential Memorandum M-12-18, Managing Government Records Directive, federal agencies are faced with the challenge of implementing a mature process to manage permanent electronic records in an accessible electronic format by December 31, 2019. The Managing Government Records Directive also mandates that all permanent and temporary email records be managed electronically by December 31, 2016. While the more immediate need is to manage email records electronically, it is wise to consider such a solution in the context of the greater electronic records management to avoid expensive and time-consuming solution redesigns further down the line. But with thousands of mailboxes, and many thousands more emails sent and received each year, the task of determining what emails should be preserved, for how long, and how to preserve them can certainly seem daunting.

To assist federal agencies with this challenge, the National Archives and Records Administration (NARA) released NARA Bulletin 2013-02 - Guidance on a New Approach to Managing Email Records. Known as Capstone, the guidance recommends deeming certain email accounts as permanent records, which will eventually be transferred to NARA. Agencies must maintain a full list of these officials and all associated email addresses. Non-permanent records can be further divided into tiers of differing retention lengths based on business function. Under Capstone, it is still the user's responsibility to sort through emails and determine what is and is not record material.

## Roadmap to Compliance

The need for a coordinated roadmap to compliance is supported by key business drivers. Agencies should first identify the drivers, goals and objectives to achieve compliance with the December 31, 2016 mandate. While legal compliance is certainly an end-state objective. Agencies will also benefit from reduced litigation, increased transparency, role-based training, and improved access and accountability. Savan Group has developed a comprehensive process and framework to ensure agencies are able to achieve compliance as illustrated in Figure 1 below. A People, Process, and Technology (PPT) evaluation framework provides the foundation for an integration plan that leads to compliance. It is not enough to simply achieve compliance once; agencies must ensure continued compliance with the Executive Order. Having a mature governance program in place to provide situational awareness, ongoing reviews, and compliance metrics is critical to a successful implementation.

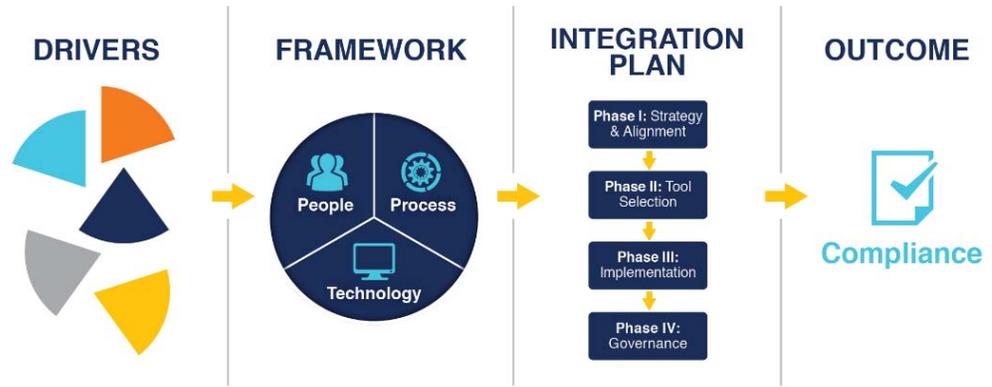


Figure 1: A tailored roadmap to compliance combines agency drivers, a people, process, and technology framework, and integration plan to achieve continued compliance

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### Framework

Utilizing a PPT framework, Agencies are able to define appropriate initiatives based on each agency's unique challenges and drivers to implement holistic Capstone solutions that ensure legal compliance in advance of the December 31, 2016 mandate.

**People:** Senior officials such as directors, staff assistants, CIOs, and all department heads who are responsible for agency policy and mission-related actions should be considered for inclusion in the permanent Capstone tier. A larger set of other executive-level and senior employees whose emails are not chosen for permanent retention may be well-suited for an intermediate retention length, with all other employees having their emails retained for a shorter period. Agencies should also conduct outreach and develop training to promote Capstone and electronic email records management.

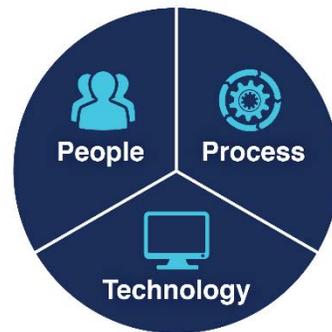


Figure 2: A People, Process, and Technology approach leads to an appropriate application of Capstone throughout the agency.

**Process:** Agencies must identify policies that need updating to ensure ongoing compliance with legal mandates, as well as providing policy guidance. Appropriate retention schedules for each of the identified Capstone tiers based on business function analysis must be developed.

Microsoft technologies, such as Exchange 2016, support the automation of these processes, reducing the records management burden on individual employees and leading to compliance with legal mandates. By automating email records management, agencies can ensure that documents are appropriately captured for future reference and use, as well as appropriately dispositioned. Employees spend less time on the administrative tasks associated with records management, increasing operational efficiency. Furthermore, automation reduces the risk that records are improperly disposed of before their disposition date, reducing the risk of litigation.

**Technology:** Capstone teams must provide guidance on configuring Exchange 2016 to support NARA's Capstone approach. Utilization of the Managed Folder Assistant in conjunction with Exchange policy tags will automatically save messages for the required length of time and take the appropriate disposition action when needed. One can configure Microsoft SharePoint in order to facilitate the tracking of Capstone individuals. Microsoft SharePoint allows collaborative editing of and access to the list, and is easy to update when an employee leaves the agency or receives a promotion.

Even armed with all this knowledge, it can be difficult to achieve compliance. A roadmap, in the form of a phased integration plan, can help overcome resistance to change. Such a plan encourages reflection and lessons learned after phase, and establishes a solid foundation of available data to make future decisions. It will also allow your agency to establish meaningful metrics to monitor program health and continuing compliance long after the December 31, 2016 deadline has passed, and aid in the successful implementation of a great electronic records management program in advance of the mandated December 31, 2019 date.

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## About Savan Group

Savan Group, a Small Business Administration 8(a) consulting firm based in Arlington, VA, has supported Capstone implementation at federal agencies such as the Department of Justice and Internal Revenue Service. Savan Group is experienced in evaluating individuals for inclusion in Capstone tiers based on role and business function.

For more information please contact Vice President of Information Technology Dan Albarran at [dalbarran@savangroup.com](mailto:dalbarran@savangroup.com).