# The Capstone Approach to Email Management in the Transforming Online Mail with Embedded Semantics (TOMES) Project

# Capstone Background and Definition

The Capstone Approach is a method of email management that bases appraisal and scheduling on the account owner's role or position rather than individual email content, as a means of simplifying and automating management. While the traditional approach has been retention and disposition based on email-by-email content review, the volume of email generated at many institutions makes this impractical. Permanently valuable email is at risk of not being transferred to the archive, and temporary email can be destroyed too soon or too late, creating a risk management hazard. The Capstone Approach was codified by the National Archives and Records Administration (NARA) in 2013 in NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records (known as the Capstone Bulletin).

According to the bulletin, "The Capstone Approach offers agencies the option of using a more simplified and automated approach to managing email that allows for the categorization and scheduling of email based on the work and/or position of the email account owner." Email accounts are designated as either permanent or temporary, based on the reasoning that email with permanent value in documenting the agency's core functions is most likely to be produced by certain account holders such as senior officials, while much of the rest is either duplicate or temporary. Permanent accounts (or individual emails categorized as permanent) can be transferred to the archive, while temporary accounts can be destroyed when their retention period ends.

The approach can potentially cut back on labor-intensive email-by-email appraisal, increases the transfer of emails to the archive by simplifying the process, reduces the incidence of print-and-file archiving, and reduces the amount of non-permanent materials retained. Email is managed in electronic format, and agencies have flexibility in application of the Capstone approach based on their technology, resources, and needs. Furthermore, this management approach allows options for automation, such as blocking particular domains and screening out duplicates.

# Email Management at the State Archives of North Carolina

In the past, staff at the State Archives of North Carolina (SANC) kept track of individuals separating from state government employment and collected their emails as needed. However, with decreased media coverage of and increased turnover in government positions, such an approach became unsustainable.

#### Capstone Forms

, As one of the deliverables for the Transforming Online Mail with Embedded Semantics (TOMES) grant, SANC developed their own implementation of the Capstone approach. In 2015 staff researched NARA's documentation on and implementation of the Capstone approach, as well as regulatory and state requirements and other factors in appraisal. Building on the guidance documentation and forms used by NARA, records analysts at SANC created three forms that were sent to state agency chief records

<sup>&</sup>lt;sup>1</sup> National Archives and Records Administration, "White Paper on the Capstone Approach and Capstone GRS," April 2015, <a href="https://www.archives.gov/files/records-mgmt/email-management/final-capstone-white-paper.pdf">https://www.archives.gov/files/records-mgmt/email-management/final-capstone-white-paper.pdf</a> (accessed 09/05/2018), p. 3.

officers (CROs) to identify Capstone email accounts for permanent retention. The forms requested the names, position title, BEACON position number, all email addresses, and beginning date when the individual entered the position. The forms also asked for predecessors dating back to 2011. A focus group was formed to review the forms during their development and provide feedback. SANC staff consulted with CROs, IT managers, and the Chief Information Officers Council. The documents were sent separately over the course of several weeks to include time to complete the and for CROs ask any questions regarding the collection of email addresses.

The first form solicited executive-level positions such as agency heads and assistants based on organizational structure. The second form included non-executive roles that create or receive archival email such as staff assistants, principal management positions, supervisors, advisers, and rule-makers based on position function. Finally, the third form asks for any positions not already listed that create official records documenting agency policies and decisions, including a list of twelve subjects with archival value. The forms were sent to CROs, and a video tutorial on the SANC YouTube channel explained how to fill out the forms.<sup>2</sup>

## Partnerships with IT and HR

SANC staff worked with the Department of Information Technology (DIT) and Office of State Human Resources (OSHR) automate the transfer of archival email based on the BEACON position number collected in the forms sent to CROs. A module was created in BEACON to "flag" or mark Capstone position numbers in the HR system, which could then connect to DIT email systems.

With Capstone positions flagged in BEACON, DIT can also place a legal hold on the corresponding email accounts. North Carolina state government uses Office365 for its email services, with the majority of agencies on centralized cloud-based email. Hosted and managed offsite by Microsoft, email archiving rules such as retention periods can be applied as needed. Capstone accounts have an indefinite legal hold until the individual leaves that position, at which time it will transfer to the archives. All other email accounts will have a five-year retention per Executive Order No. 12.<sup>3</sup> The personnel management system can generate a regular report of people moving in and out of Capstone positions. CROs are also asked to keep SANC apprised of changes to their agency's structure that include positions being created, changed, or removed that may impact Capstone status.

## Capstone and the Functional Schedule

. Email is included in RC number 133, Correspondence, under Agency Management in the Functional Schedule. The schedule contains a succinct description of the Capstone approach and how it integrates with the Functional Schedule. While the TOMES project identified positions that create archival correspondence to be archived when the person separates, non-Capstone employees are also responsible for identifying and retaining any emails for audit or other long-term retention. Section 133.A lists the positions whose email is identified as archival and which will be flagged by DIT for legal hold until the person separates, at which time the account will be downloaded and transferred to the

<sup>&</sup>lt;sup>2</sup> https://www.youtube.com/embed/UA0-0BSwo4U

<sup>&</sup>lt;sup>3</sup> Pat McCrory, "Executive Order No. 12 Amending the State E-mail Retention and Archiving Policy," May 21, 2013 http://digital.ncdcr.gov/cdm/compoundobject/collection/p16062coll5/id/20571/rec/5.

Archives. 133.P lists series that are to be stored permanently in office, including email correspondence, and upon appraisal may be transferred to the Archives.<sup>4</sup>

### Resources:

NARA, "White Paper on The Capstone Approach and Capstone GRS," April 2015, https://www.archives.gov/files/records-mgmt/email-management/final-capstone-white-paper.pdf

Council of State Archivists (CoSA) Resource Center – Assessment of Emails for Permanent Retention, parts 1-3 <a href="https://www.statearchivists.org/resource-center/resource-library/">https://www.statearchivists.org/resource-center/resource-library/</a>

YouTube video about Capstone and account identification forms: https://www.youtube.com/embed/UA0-0BSwo4U

Other NARA Capstone resources: https://www.archives.gov/records-mgmt/email-management/capstone-training-and-resources.html

<sup>&</sup>lt;sup>4</sup> State Archives of North Carolina, "Functional Schedule for North Carolina State Agencies, 1. Agency Management," 2018, <a href="https://archives.ncdcr.gov/documents/functional-schedule-state-agencies">https://archives.ncdcr.gov/documents/functional-schedule-state-agencies</a> (accessed September 5, 2018), p. 1-6.