

# BPA Policy 236-261

## SES Email Content Management Through Capstone

### Table of Contents

1. Purpose & Background .....	2
2. Policy Owner .....	2
3. Applicability .....	2
4. Terms & Definitions .....	2
5. Policy.....	3
6. Policy Exceptions .....	4
7. Responsibilities .....	4
8. Standards & Procedures .....	5
9. Performance & Monitoring .....	5
10. Authorities & References .....	6
11. Review .....	6
12. Revision History .....	7
Appendix A: Example of SES Position Description/Number Roster .....	8



## 1. Purpose & Background

- A. In 2013, the National Archives and Records Administration (NARA) introduced “Capstone” which offers Federal agencies the option of using a more simplified and automated approach to email content management. Capstone allows agencies to schedule email content retention based on the mailbox owner’s role in the agency, as opposed to enacting policies that require staff to file email records and assign retention periods individually.
- B. The Capstone approach allows for the capture of records that should be preserved permanently from the accounts of employees most likely to regularly create Federal records. These employees include officials at or near the top of an agency or organizational subcomponent. Following this approach, an agency can schedule all, or a designated subset, of the email in Capstone accounts as permanent records.

## 2. Policy Owner

The Executive Vice President of Compliance, Audit and Risk Management has overall responsibility for this policy. The Agency Records Officer within Information Governance develops, implements, and manages this policy on behalf of the Executive Vice President of Compliance, Audit and Risk Management.

## 3. Applicability

- A. This policy applies to all Senior Executive Service (SES) employees and their Executive and Management Associates who use BPA’s email system. Access to BPA’s email system includes desktops, laptops, tablets, PDAs, or other IT equipment.
- B. Employees subject to this policy are still subject to BPA Policy 236-260, Email Systems. However, this policy supersedes 236-260 regarding management of email content as Federal records. For the purposes of this policy, the term “SES employee” includes both individuals in an SES position of record and individuals designated as acting in an SES role from the effective date of the Request for Personnel Action (Standard Form SF-52).

## 4. Terms & Definitions

- A. As used in this policy, the following terms and definitions apply:
  - 1. **Capstone:** A means of managing and scheduling email content where final disposition is determined by the role or the position of the account user rather than the content of each individual email, tasks, or calendar event.
  - 2. **Discovery Core:** BPA’s electronic record keeping system (ERKS) with the capability to manage, track, locate, and hold unstructured data to comply with current Federal and legal requirements for information governance, eDiscovery, and FOIA.

<b>Organization</b> Information Governance (CGI)	<b>Title</b> SES Email System Management Through Capstone	<b>Unique ID</b> 236-261		
<b>Author</b> Rachel Hull, CGI	<b>Approved by</b> Thomas McDonald, EVP CAR	<b>Date</b> 8/21/2018	<b>Version</b> 1.2	Page 2

Consolidated Archive and HP Records Manager are the two Discovery Core modules used to implement Capstone.

3. **Federal Record:** All recorded information, regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them. Materials made or acquired solely for reference, extra copies of documents preserved only for convenience of reference, and stocks of publications are not included - see Federal Records Act, 44 USC § 3301.
4. **Email Content:** Incoming and outgoing email messages (including cc's, bcc's, and distribution lists), email metadata, calendaring, notes, and task items.
5. **Exchange Journaling:** The process of copying all email communications in real time for the purposes of regulatory compliance and data retention for eDiscovery, FOIA, regulatory audits, and SES Capstone only.

B. As used in this policy, the following acronyms apply:

1. **ERKS:** Electronic Record Keeping System
2. **FOIA:** Freedom of Information Act
3. **IGLM:** Information Governance and Lifecycle Management
4. **IGOT:** Information Governance Oversight Team
5. **NARA:** National Archives and Records Administration
6. **OGC:** Office of General Counsel
7. **SES:** Senior Executive Service

## 5. Policy

- A. BPA will manage all SES employee email content using NARA's Capstone approach.<sup>1</sup> Discovery Core, through the Consolidate Archive module, preserves a copy of all incoming and outgoing email messages (including cc's, bcc's, and distribution lists), email metadata, calendaring, notes, and task items for all SES employees and their Executive Associates through journaling.
- B. All email content retained through journaling is a copy and is used to fulfill BPA's obligation to appropriately maintain the Federal records of senior officials for responding to FOIA or litigation requests, and to offer to NARA as permanent records

<sup>1</sup> Note: With GS-to-SES details there is no change to grade or pay plan. For the purposes of this policy, GS-to-SES details will be included in the Capstone approach to managing email as SES.

<b>Organization</b> Information Governance (CGI)	<b>Title</b> SES Email System Management Through Capstone		<b>Unique ID</b> 236-261	
<b>Author</b> Rachel Hull, CGI	<b>Approved by</b> Thomas McDonald, EVP CAR	<b>Date</b> 8/21/2018	<b>Version</b> 1.2	Page 3

when appropriate. BPA’s SES employees and their Executive Associates do not have access to journaling content and must manage and maintain Outlook content in accordance with BPA Policy 236-260, Email Systems, for business purposes.

**C. Email Accounts of SES – Executive Office Employees and other Principal Management Positions**

The Outlook content described above in 5.A of SES – Executive Office Employees (Administrator, Deputy Administrator, Chief Operating Officer, Chief Administrative Officer, Chief Financial Officer and General Counsel), Chief Information Officer, Executive Vice President, Compliance, Audit and Risk and their Executive Associates is maintained as permanent Federal records. These records are retained by BPA for 15 years and then offered to NARA in five year increments for permanent retention.

**D. Email Accounts of SES – All Executive Vice President, Senior Vice Presidents and Vice President Employees**

The Outlook content described above in 5.A of SES – Executive Vice Presidents, Senior Vice Presidents, Vice Presidents and their Executive Associates is retained by BPA for seven years and then disposed.

**6. Policy Exceptions**

None

**7. Responsibilities**

- A. **SES Email Users/SES Executive Associates:** All SES users/SES Executive Associates will appropriately manage email content as aided by Discovery Core (see BPA Policy 236-200, Managing Unstructured Data as Information Assets) and this Capstone email policy.
- B. **IT Infrastructure Administration Services, Email/Exchange Team:** The Email/Exchange team implements the IGLM requirements of this policy including retention periods in the email system; provides regular reports for compliance purposes; and manages the email environment in accordance with the service level agreements that have been developed to ensure appropriate information management standards.
- C. **IGLM Team:** The IGLM team has programmatic responsibility for developing policy and guidance on managing information assets in email format both within and outside of the email system, including Exchange journaling content of SES employees and their Executive Associates in Discovery Core; offers training on the policy contained in this and other 236 series BPA policies as well as Federal regulations; monitors and audits use of the BPA email system for compliance; and supports OGC and the Cyber Forensics team in conducting legal searches, applying legal holds, and addressing discovery requirements.

<b>Organization</b> Information Governance (CGI)	<b>Title</b> SES Email System Management Through Capstone		<b>Unique ID</b> 236-261	
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- D. Agency Records Officer (ARO): The ARO manages the IGLM program for its policy, training, and compliance responsibilities. The ARO reviews and approves/denies requests for exceptions to the 236 series of policies including retention and inbox size limits. The ARO also authorizes the move of Exchange Journaling content between Discovery Core modules.
- E. Cyber Forensics and Intelligence Analysis team (“Cyber Forensics”): The Cyber Forensics team within the Cyber Security Office coordinates with OGC on discovery activities including legal searches and holds; directs and applies legal holds for the email system in coordination with the Email/Exchange team; and collects and manages materials from the email system that may be relevant to litigation, audits, investigations, and other similar forensic activities. As the organization assigned full administrative permissions for Consolidated Archive, the Cyber Forensics team is responsible for moving Capstone content from Consolidated Archive to HP Records Manager on a regular basis and in coordination with the IGLM Team.
- F. Human Resources – Recruitment and Classification: The Recruitment and Classification organization provides current rosters of SES employees in both the position of record and acting capacities per the position description and position numbers upon regular request from the IGLM team. Appendix A of this policy provides an example of the roster.

## 8. Standards & Procedures

- A. Journalled copies of Outlook content are maintained in Consolidated Archive for three years and then moved to the HP Records Manager on a regular basis to be maintained for the remaining retention period as described in sections 5.C and 5.D above. Transitory Recorded Information is removed through the HP Records Manager process.
- B. On a quarterly basis, the IGLM team reviews the roster of position descriptions and position numbers as provided by the Recruitment and Classification organization and identifies any changes to individuals in SES/SES Executive Associate positions or changes to the positions themselves and notifies the Cyber Forensics team, which then makes necessary adjustments to capture emails under Capstone.

## 9. Performance & Monitoring

The IGLM team within Agency Governance and Compliance, Cyber Forensics and Human Resources – Recruitment and Classification are responsible for performance standards and monitoring plans contained in this policy.

### A. Performance Standards

1. The email system technical performance standards are maintained by the Email/Exchange team.

<b>Organization</b> Information Governance (CGI)	<b>Title</b> SES Email System Management Through Capstone		<b>Unique ID</b> 236-261	
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2. 99% of all accounts in Discovery Core, Consolidated Archive module, should have the appropriate retention policy applied.

**B. Monitoring Plans**

1. Cyber Forensics provides a quarterly report to the IGLM team on:
  - a) Accounts in Consolidated Archive with a fifteen and seven year retention policy.
  - b) Capstone content in Consolidated Archive ready for transfer to HP Records Manager.
2. Human Resources – Recruitment and Classification provides a quarterly report to the IGLM team on:
  - a) SES employees both in the position of record and acting capacities per the position description and position number.
  - b) Executive Associates both in the position of record and acting capacities per the position description and position number.

**10. Authorities & References**

- A. 44 USC § 2904, 3101, 3102, 3105, The Federal Records Act
- B. 36 CFR § 1235.44 – 50, Requirements for transfer of electronic permanent records to NARA
- C. 36 CFR § 1236.10 – 14, Records Management and Preservation Considerations for Designing and Implementing Electronic Information Systems
- D. 36 CFR § 1236.20 – 28, Subpart C, Additional Requirements for Electronic Records
- E. OMB Circular A-130, Management of Federal Information Resources
- F. OMB M-12-18, Managing Government Records Directive
- G. NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records

**11. Review**

The IGLM team within Information Governance is the responsible organization for managing this policy’s review. This policy is reviewed on a three-year cycle beginning in 2017. All IGLM policies are reviewed when revisions are introduced to BPA Policy 236-1, Information Governance and Lifecycle Management, or other policies governing information management. Editorial updates to the policy and attachments may be made without IGOT and Policy Working Group review and approval.

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## 12. Revision History

<b>Version Number</b>	<b>Issue Date</b>	<b>Brief Description of Change or Review</b>
1.0	1/4/2017	Published completed original chapter, cmfrost.
1.1	8/21/2018	Updated Chief Financial Officer retention period; added performance and monitoring metrics, R. Hull
1.2	2/15/2019	Updated Chief Information Officer and EVP Compliance, Audit and Risk Management retention period, C. Palen

<b>Organization</b> Information Governance (CGI)	<b>Title</b> SES Email System Management Through Capstone	<b>Unique ID</b> 236-261
<b>Author</b> Rachel Hull, CGI	<b>Approved by</b> Thomas McDonald, EVP CAR	<b>Date</b> 8/21/2018
	<b>Version</b> 1.2	Page 7

# Appendix A: Example of SES Position Description/Number Roster

As of 02/13/2019:

ORG		Title	Position #	PD		
A	Executive Office	Administrator and Chief Executive Officer	'00000159	J00159	ES	'0340
B	Business Transformation Office	Executive Vice President, Business Transformation <sup>2</sup>	'00004309	J06988	ES	'0340
C	Compliance, Audit and Risk Management	EVP, Compliance, Audit and Risk Management	'00004688	J05892	E5	'0340
D	Deputy Administrator	Deputy Administrator	'00000374	J06673	ES	'0340
E	Environment Fish & Wildlife	VP, Environment, Fish and Wildlife	'00000078	J00078	ES	'0340
F	Finance	Executive VP and Chief Financial Officer	'00002385	J03325	ES	'0340
J	Information Technology	Acting EVP, Information Technology & CIO	'00000082	J07086	E5	'2210
K	Chief Operating Officer	Chief Operating Officer	'00000189	J00189	ES	'0340
L	Office of General Counsel	Executive VP and General Counsel	'00001315	J03266	ES	'0905
N	Chief Administrative Office	Chief Administrative Officer	'00002174	J05885	ES	'0340
P	Power Services	Senior Vice President for Power Services	'00001177	J01177	ES	'0340
PE	Energy Efficiency	VP, Energy Efficiency	'00002449	J02449	ES	'0340
PG	Generation Asset Management	VP, Generation Asset Management	'00001494	J01494	ES	'0340
PS	NW Requirements Marketing	VP, Requirements Marketing	'00002989	J02971	ES	'0340
PT	Bulk Marketing	VP, Bulk Marketing	'00002569	J02569	ES	'0340
T	Transmission Services	Senior Vice President for Transmission Services	'00001065	J05989	ES	'0850
TE	Engineering and Technical Svcs	VP, Engineering & Technical Services	'00001825	J01511	ES	'0850

<sup>2</sup> This role is currently being performed by the Deputy Executive Vice President.

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	<b>Version</b> 1.2	Page 8

TF	Transmission Field Services	VP, Transmission Field Services	'00002188	J02188	ES	'1601
TO	System Operations	VP Transmission System Operations	'00002959	J06318	ES	'0850
TP	Planning & Asset Management	VP, Planning and Asset Management	'00001468	J06675	ES	'0850
TS	Transmission Marketing & Sales	VP, Transmission Marketing & Sales	'00002922	J02429	ES	'1101

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	<b>Version</b> 1.2	Page 9