

## Requirements to Manage E-mail Using the Capstone Approach

This records retention schedule applies **only** to local government agencies that implement a Capstone Approach as described in this retention schedule. Local government agencies who have not formally adopted the Capstone Approach must use General Schedule 1 or Municipal Schedule 8 to manage e-mail records.

In order to utilize the Capstone Approach, local government agencies must:

1. Formally adopt the Capstone Approach for managing e-mail as official policy and designate the level the approach will be used in the organization (organization wide, department level, office, etc.) For guidance see:
  - [NARA's Capstone Training and Resources](#)
  - [NARA's E-mail Specific Guidance and Resources](#)
2. Identify the official repository for e-mail records managed under the Capstone approach. This can be an e-mail archive, records management application, the live system or other technology. All other version of email can be considered non-record and disposed.
3. Designate the point/time of official capture (the time when e-mail is locked down for disposition.)
4. Develop a list of Capstone Officials and Non-Capstone Employees.
5. Describe how e-mail will be captured, maintained, searched and retained under the policy.
6. Develop a procedure and/or planning document to assure permanent access to Capstone Officials' email, and commit to planning and budgeting for the migration of email records to new storage media, formats and or systems in order to avoid loss due to media decay or technology obsolescence.
  - For guidance, see Code of Federal Regulations (CFR), [Title 36, Part 1236](#)
7. Develop a procedure to update and maintain lists of Capstone Officials and Non-Capstone employees.
8. Develop a procedure to halt automated disposition of e-mail records in the repository for litigation/regulatory holds.

### **System requirements:**

The system/technology used to manage e-mail under the Capstone Approach must be able to:

- include attachments to e-mail messages at capture
- support retention of the message content and required metadata (To, From, Date/Time.)
- allow for identification and designation of individual accounts as either permanent (Capstone) or temporary (Non-Capstone)
- allow all accounts associated with a Capstone official to be identified and managed. For example, multiple accounts used by an individual and/or accounts management on behalf of a Capstone official can be identified and managed.
- support routine updates to account designations. Since agencies will be responsible for managing accounts, account designations must be updated during staff changes, when new positions are created, and/or when individuals serve in an "acting" capacity.
- support the identification and management of lists which identify the sender and addressee(s) of messages including distribution lists and bcc.
- allow for the application of disposition rules based on the account designations (for example, those accounts designated as "Non-Capstone" can be assigned the proper retention period).
- allow for "Non-Capstone" email to be fully destroyed in compliance with disposition rules, schedules, and other requirements.
- allow for permanent email (and associated metadata, attachments, etc) to be exported and transferred or migrated to new recordkeeping systems. Local governments should use Administrative Rule [44.14.202](#) "STORAGE REQUIREMENT FOR ELECTRONICALLY STORED DOCUMENTS WITH GREATER THAN TEN YEAR RECORD

## Schedule #30-- Email Managed Under a Capstone Approach

RETENTION (LONG-TERM RECORDS)" as guidance to manage Capstone officials' e-mail messages in order to ensure Capstone official e-mail records are accessible permanently.

- facilitate and support the application of record/litigation holds, at both the individual email and account levels to halt disposition as appropriate.
- Facilitate and support the production of e-mail to respond to discovery and public records requests.
- Automated culling of non-record material (for example spam, read receipts, appointment confirmations, etc.)

Local Government agencies are reminded that this retention schedule should not be implemented in isolation, and should be supplemented with agency-wide policies and training.

Under the Capstone Approach, email can be managed at an account level, at a mailbox level, in personal folder files, or other ways. This retention schedule applies to all email, regardless of how the email messages are managed or what email technology is used. Email, in the context of this retention schedule, also includes any associated attachments. This retention schedule may apply to records affiliated with other commonly available functions of email programs such as calendars/appointments, tasks, and chat.

Local government agencies have discretion to require that certain individual email messages be cross-filed elsewhere outside of the Capstone repository pursuant to agency policies and business needs. Retention of these messages is subject to General Schedule 1 or Municipal Schedule 8.

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Schedule No. **30**

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Montana Local Government  
Records Committee

# Capstone Approach for Email Records

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**MONTANA LOCAL GOVERNMENT RETENTION AND DISPOSITION SCHEDULE**

Schedule 30: Email Managed Under a Capstone Approach

<b>Email Records Managed Under a Capstone Approach</b>			
<b>Item #</b>	<b>Record Series Title and Description</b>	<b>Retention and Disposition</b>	<b>Citation/Comments</b>
1.	<b>CAPSTONE POLICY</b>	Permanent	Note: This policy is required in order to utilize the Capstone Approach. See “Requirements to Manage E-mail Using the Capstone Approach.”
2.	<b>E-MAIL OF CAPSTONE OFFICIALS.</b> Capstone officials are elected officials, directors, department heads, and appointed officers, and high level assistants who perform functions on behalf of named capstone officials under the officials’ name. (ie, an assistant authorized to send email from an account bearing a capstone official’s name.)  Other positions designated by an agency for Capstone retention.	Permanent	
3.	<b>E-MAIL OF NON-CAPSTONE EMPLOYEES</b> Email of all other officials, staff, and contractors not included in item 2. a. Support and/or administrative positions 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 agencies and their programs. This includes, but is not limited to roles and positions that process routine transactions; provide customer	a. Retain 3 years, No RM 60 required.*	

\*RM 60 is a records disposal request form issued by the Local Government Records Committee. “No RM 60 required” means that the records do not need to be submitted to the LGRC disposal subcommittee for approval before being disposed unless the records are over 10 years old.

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	<p>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.</p> <p>b. Supervisory/Project Management positions Mid-level supervisory functions and/or positions responsible for major capital project management</p> <p>c. All other positions</p>	<p>b. 10 years, RM 60 required.</p> <p>c. Retain 7 years; No RM 60 required.*</p>	
4.	<p><b>DESIGNATIONS</b> Records documenting the designation of positions/accounts for e-mail retention purposes</p> <p>a. Capstone Officials b. Non-Capstone Employees</p>	<p>a. Permanent b. 10 years, RM 60 required</p>	
5.	<p><b>NON-RECORD EMAIL</b> Non-record e-mail culled and not designated for retention (ie. spam, e-mail blasts, read/open receipts, out-of-office replies, etc.)</p>	<p>Dispose at will</p>	

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