



April 6, 2016

Memorandum for: Senior Agency Officials for Records Management

From: David S. Ferriero
Archivist of the United States

Subject: Criteria for Managing Email Records in Compliance with the
Managing Government Records Directive (M-12-18)

The Office of Management and Budget (OMB) and National Archives and Records Administration (NARA) released Memorandum M-12-18, Managing Government Records Directive, on August 24, 2012. The Directive outlines goals for agencies to meet to develop a 21st-century framework for the management of Government records. One of these goals is to manage all email records in an electronic format by December 31, 2016.

NARA is issuing this guidance to provide clarification of the existing requirements that directly relate to email management. This represents a synthesis of the statutory, regulatory, and NARA guidance requirements. Agencies should use this guidance internally to evaluate their progress in meeting the Directive goals.

Successful records management is a complex issue. I encourage you to work with your agency records officers and NARA to ensure the efficient and effective implementation of records management at your agency.

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Criteria for Managing Email Records in Compliance with the Managing Government Records Directive (M-12-18)

National Archives and Records Administration
April 6, 2016

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Foreword

The Office of Management and Budget (OMB) and National Archives and Records Administration (NARA) released Memorandum M-12-18, Managing Government Records Directive, on August 24, 2012. The Directive outlines targets for agencies to meet to develop a 21st-century framework for the management of Government records. Directive Goal 1.2 states:

By December 31, 2016, Federal agencies must manage all email records in an electronic format. Email records must be retained in an appropriate electronic system that supports records management and litigation requirements (which may include preservation-in-place models), including the capability to identify, retrieve, and retain the records for as long as they are needed.

Since issuance of the Directive, NARA has been working with Federal agencies, Congress, and other parties to update existing statutory, regulatory and NARA guidance requirements for managing email. The enclosed guidance synthesizes the email records management requirements from the Federal Records Act, Code of Federal Regulations and existing NARA guidance. Agencies should use this guidance internally to evaluate their progress towards meeting Directive Goal 1.2. Additionally, NARA expects to rely on this guidance to determine how successful Federal agencies are in complying with Directive Goal 1.2.

NARA has defined successful email management as having policies and systems in place to ensure that email records can be used, accessed, and have the appropriate disposition applied. These success criteria reflect the complex challenges that agencies face in managing email. NARA recognizes that agencies may be stronger in some aspects of email management than others. Organizational complexity, schedule development, budgetary or procurement constraints may affect each agency's ability to meet specific criteria. NARA also recognizes that managing email records effectively, and in compliance with the Directive Goal 1.2, does not end on December 31, 2016. For many agencies, full implementation of the success criteria for email management is an ongoing process that continues beyond this calendar year.

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2016 Email Management Success Criteria

1. Purpose

The 2012 OMB/NARA [Managing Government Records Directive \(M-12-18\)](#) includes a requirement that by December 31, 2016 Federal agencies must manage all email records in an electronic format and can no longer use print and file policies to manage email records. Accordingly, email records must be retained in an appropriate electronic system that supports records management and other agency business needs. In order to successfully meet the Directive's 2016 requirement of managing email electronically, each agency must have in place applicable records schedules, agency policies, and IT systems to ensure that emails that are Federal records can be accessed, managed, and preserved until the appropriate disposition is applied.

This document and its appendices describe the existing records management requirements in statutes, regulations and NARA guidance that apply to email records. NARA views use of these success criteria as fundamental to successful electronic management of email. The appendices provide additional information on managing email records. Appendix A provides questions for agencies to review and answer with internal stakeholders. Appendix B provides an analysis of specific email management requirements as they relate to portions of the records management lifecycle.

Agencies should use this document to identify areas of strength and weakness in their current program, guide internal discussions with stakeholders, and identify any steps required to meet the 2016 email target. NARA will ask agencies questions related to the four categories of success criteria in future reporting period. NARA recognizes the complexities of email management and encourages agencies to contact us with any questions.

2. Success Criteria

NARA categorized the records management considerations for email into the following groups: policies, systems, access, and disposition. Agencies may have specific email management requirements that go beyond the scope of this document related to the Freedom of Information Act, Privacy Act, cyber security, security classified information, controlled unclassified information, litigation, or other requirements. Agencies that create and maintain email records containing classified national security information must manage the records in accordance with [32 CFR Subtitle B Chapter XX Part 2001](#) and [Executive Order 13526](#).

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Policies: Agency-wide policies and training must inform account holders of their responsibilities for managing email records. Policies should be developed with all relevant stakeholders and should address the requirements of the [Federal Records Act, 36 CFR Chapter XII Subchapter B](#), and [NARA guidance](#).

What Success Looks Like: Your agency's policies and training programs explain staff responsibilities for managing email records. The policies and training should instruct staff how to distinguish between permanent, temporary, transitory, and non-record email messages and how to appropriately handle email messages containing classified national security information and those created on non-official or personal electronic messaging accounts.

Systems: Agencies must have systems in place that can produce, manage, and preserve email records in an acceptable electronic format until disposition can be executed. Additionally, systems must support the implementation of agency policies and provide access to email records throughout their lifecycle.

What Success Looks Like: Your agency's systems and business processes support the management of email records in accordance with all applicable requirements including the manual or automatic execution of their disposition whether using a Capstone-based or content-based record schedule.

Access: Email records must remain usable and retrievable throughout their lifecycle. Access supports an agency's ability to carry out its business functions. Access should address internal agency needs and accommodate responses to requests for information.

What Success Looks Like: Your agency's email records are maintained in a system that preserves their content, context and structure, protects against their unauthorized loss or destruction, and ensures that they remain discoverable, retrievable, and usable for the period specified in their retention schedule.

Disposition: The agency must have a NARA-approved schedule in place to be able to carry out the disposition of permanent and temporary email records – using either agency-specific schedules or [General Records Schedule \(GRS\) 6.1: Email Managed under a Capstone Approach](#).

What Success Looks Like: Your agency has identified appropriate retention periods for email records and implemented systems and policies to support the disposition as specified in an approved records schedule.

3. Overview of agency responsibilities for managing email records

The Federal Records Act (FRA) and NARA's regulations require that all Federal records be appropriately managed for as long as needed. Agency-administered email accounts contain messages that meet the definition of Federal records. This includes email accounts with multiple users such as public correspondence or individual email accounts with multiple users. Agencies will need to access email of current and former employees, contractors, volunteers, and others to be responsive to information requests.

The 2014 amendments to the Federal Records Act made several substantive changes that impact electronic records management. The changes include an updated definition of "record," to include all "recorded information...created, manipulated, communicated, or stored in digital or electronic form" (44 U.S.C. 3301). The FRA also added requirements for managing email records created or received in non-official and personal electronic messaging accounts (44 USC 2911). The new requirements state employees may not create or send a record using a non-official or personal account unless they:

- copy an official electronic messaging account during the creation, receipt, or transmission of the record; or
- forward a complete copy of the record to an official electronic messaging account not later than 20 days after creation, receipt, or transmission of the record.

All persons who use agency email accounts or conduct business on behalf of the agency should be trained on their records management responsibilities related to email. In order to protect against loss, agencies should provide clear instructions on the use of personal accounts or devices.

NARA's regulations describe the requirements for managing electronic information systems that create or provide access to email ([36 CFR Part 1236](#)). NARA also produces Bulletins that provide fundamental records management guidance to Federal agencies. Agencies must then determine the most appropriate ways to incorporate the requirements into their business processes and identify the specific means by which their agencies will fulfill their responsibilities.

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In 2013, NARA issued [Bulletin 2013-02](#) describing a new, role-based approach to managing email records called Capstone. In September 2014, NARA issued [Bulletin 2014-06](#), reminding agencies of their responsibilities for managing email. In 2015, NARA released a [GRS for Capstone](#) email records. Agencies should select the approach for managing email records that best supports their business requirements and complies with relevant laws, regulations, NARA guidance, and the Directive.

Agencies must have records management controls built into electronic information systems, services, and applications in combination with appropriate policies and procedures to ensure that records:

- maintain their content, context, and structure;
- can be associated with their creators and agency;
- accurately represent the transactions, facts, or information they document;
- are protected against unauthorized alteration, deletion, or use; and
- can be located, retrieved, presented, and interpreted for business use until the NARA-approved retention period is met and disposition can be executed.

Agencies should continually evaluate and monitor their programs' management of email for compliance with all records management requirements.

4. Resources

[Circular No. A-130 Revised: Management of Federal Information Resources](#)

This Circular establishes policy for the management of Federal information resources. OMB includes procedural and analytic guidelines for implementing specific aspects of these policies.

[Department of Defense \(DoD\) Standard 5015.02:](#)

This standard establishes policy and assigns responsibilities for the management of DoD records in all media, including electronic records. The standard identifies one approach to meeting functional requirements needed for records management systems.

[Executive Order 13526 - Classified National Security Information](#)

This Order prescribes a uniform system for classifying, safeguarding, and declassifying national security information, including information relating to defense against transnational terrorism.

[Guidance on Managing Email \(OMB M-14-16\):](#)

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This Memorandum reminds Federal agencies about their records management responsibilities regarding managing and retaining email records.

[Managing Government Records Directive \(OMB M-12-18\):](#)

This Memorandum marked the beginning of an Executive Branch-wide effort to reform records management policies and practices and to develop a 21st-century framework for the management of Government records.

[Public Law 113-187 The Presidential and Federal Records Act Amendments of 2014:](#)

This Law modernized records management by focusing more directly on electronic records, and complemented efforts by NARA and OMB to improve records management across the government.

[RFC 5322:](#)

This document provides the core standard that specifies the structure and syntax that must be used for email messages to be sent between computer systems. It also serves as the basis for the standards that define how email messages are stored and packaged such as PST, MSG, EML, and MBOX.

NARA Resources:

[Automated Electronic Records Management Report/Plan:](#)

As required by Item A3.1 of Directive M-12-18, NARA produced a comprehensive plan that describes suitable approaches for the automated management of email, social media, and other types of electronic record content, including advanced search techniques.

[NARA Bulletin 2014-06: Guidance on Managing Email:](#)

This Bulletin reminds Federal agencies about their records management responsibilities regarding managing and retaining email records.

[NARA Bulletin 2014-04: Revised Format Guidance for the Transfer of Permanent Electronic Records:](#)

This Bulletin specifies which file formats are acceptable when transferring permanent electronic records to NARA. This Bulletin contains an appendix that will be updated to reflect the continual format changes in how agencies create and use electronic records.

[NARA Bulletin 2011-03: Guidance Concerning the use of E-mail Archiving Applications to Store E-mail:](#)

This Bulletin provides guidance to Federal agencies on using e-mail archiving applications and similar technologies for managing e-mail records.

[Sample Email Management Configuration Requirements:](#)

This document provides an example of requirements for records capture, classification, access, use, administration, and migration of email records.

[The Records Management Services \(RMS\) Program:](#)

This website provides information and guidance in support of the E-Government Electronic Records Management (ERM) initiative.

5. Contacts for more information

If additional information is needed, or if you have questions, please contact your agency's Records Officer, NARA Appraisal Archivist, or records management contact. Please refer to the [list of NARA contacts](#) for your agency.

For questions related to the transfer of email records and their accompanying metadata, the agency should consult with the National Archives and Records Administration, Electronic Records Division, Processing Branch (RDEP), 8601 Adelphi Road, College Park, MD 20740, telephone number (301) 837-3420, or by email Etransfers@nara.gov.

For more information about the Capstone GRS, please see the [GRS web page](#) or [GRS 6.1: Email Managed under a Capstone Approach](#). If you have any questions about the GRS, please contact GRS_Team@nara.gov.

Appendix A: Questions to Discuss on Email Management Success Criteria

This appendix provides questions to consider related to the four success criteria: policies, systems, access, and disposition. Following a description of each criterion, there is a non-exhaustive list of questions your agency should be able to answer. Agencies may have specific email management requirements that go beyond the scope of this document. These questions are provided for agencies to facilitate discussions with stakeholders. With the answers to these questions, agencies can assess their progress towards meeting the 2016 target of managing all email in an electronic format. NARA will ask agencies questions related to the four categories of success criteria in the future reporting periods.

Policies: Agency-wide policies and training must inform all staff of their responsibilities for managing email records. Policies should be developed with all relevant stakeholders and should address the requirements of the Federal Records Act, 36 CFR Chapter XII Subchapter B, and NARA guidance.

1. Has your agency developed, disseminated, and implemented an approved email management policy throughout the agency?
2. Who are the relevant stakeholders involved in the policy creation process in your agency (for example CIO, Records Management, IT, and General Counsel)?
3. Does your agency have a NARA-approved disposition schedule in place that applies to email that are Federal records?
4. Does your agency have policies and procedures in place to access email in response to all information requests?
5. Does your agency have policies and procedures in place to protect against unintended loss?
6. Does your agency perform periodic reviews of records management policies with all relevant stakeholders?
7. Does your agency perform periodic audits to make sure employees are in compliance with records management laws, regulations, and policies?
8. Does your agency have the policies, technological means, and procedures to place legal holds on email records or accounts?
9. Does your agency have policies in place regarding the use of personal or non-official email accounts?
10. Have you trained all account holders on the requirement to copy or forward to official accounts Federal records created, received, or transmitted in personal or non-official email accounts?
11. Does your agency comply with the requirements for managing security classified information in email accounts and systems?

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Systems: Agencies must have systems in place that can produce, manage, and preserve email records in an acceptable electronic format until disposition can be executed. Additionally, systems must support the implementation of agency policies and provide access to email records throughout their lifecycle.

1. What systems does your agency use to store and manage email messages?
2. Who in your agency has the ultimate responsibility for the systems that manage email, how email is accessed, and how disposition is carried out?
3. Does your agency manage email outside of the originating system in a dedicated records management system?
4. Does your agency's email system maintain the content, context, and structure of the records?
5. Can your agency associate email records with the creator, their role, and their agency?
6. Does your system retain the components of email messages identified in [RFC 5322](#) including labels that identify each part of the header, the message content, and any attachments?
7. Are departing employees' email records preserved in accordance with NARA-approved disposition schedules?
8. If your agency's email system supports the use of codes or nicknames, or identifies addresses only by the name of a distribution list, can you provide the intelligent or full names of the sender and addressee(s) with the transfer-level documentation?
9. Can email be migrated from one system to another or to an email archiving application to ensure consistent access?
10. Does your agency use email systems to transmit classified information?

Access: Email records must remain usable and retrievable throughout their lifecycle. Access supports an agency's ability to carry out its business functions. Access should address internal agency needs and accommodate responses to requests for information.

1. Can your agency use, retrieve, and interpret email records throughout the entire NARA-approved retention period?
2. Is your agency able to access email from current and departed employees?
3. If your agency uses digital signature or encryption technology, is email usable and retrievable across the lifecycle?
4. If emails are stored on local or removable media, are they retrieved and searched when responding to an information request?

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5. Is your agency able to perform a federated search across multiple email accounts or multiple systems to find emails needed for agency business?
6. Is your agency able to prevent unauthorized access, modification, or destruction of email records?

Disposition: The agency must have a NARA-approved schedule in place to be able to carry out the disposition of permanent and temporary email records – using either agency-specific schedules or [General Records Schedule \(GRS\) 6.1: Email Managed under a Capstone Approach](#).

1. Does your agency have NARA-approved disposition schedules in place that identify the systems where Federal email records are held?
2. Has your agency analyzed existing disposition schedules to determine if they apply to email records? Have you identified gaps in the disposition schedules?
3. Has your agency established procedures to associate email records with projects or case files?
4. Has your agency developed training to inform employees of their responsibilities for managing records in email accounts in accordance with approved disposition authorities?
5. Can your agency transfer permanent email records to the National Archives of the United States in accordance with approved records schedules and applicable laws, regulations, and [NARA transfer guidance](#)?

Appendix B: Spreadsheet of Requirements for Email Management

This appendix provides a compilation of records management requirements as they apply to email records. Each requirement includes the source statute, regulation, or NARA guidance. The requirements are organized by the success criteria and the parts of the records management lifecycle listed below.

- Appraisal and Scheduling is the process by which NARA determines the value and final disposition of Federal records, designating them either temporary or permanent.
- Management and Maintenance is the process for assigning records management responsibilities in each program (mission) and administrative area. This process ensures the incorporation of recordkeeping requirements into agency programs, processes, systems, and procedures.
- Transfer and Execute Disposition is the process for taking action regarding records no longer needed to conduct current agency business. This includes implementing the destruction of records or transfer of records to NARA in accordance with an established disposition authority.

Agencies should review these requirements to assess their progress in successfully meeting the Directive target of managing email records in an electronic format.

Criteria	Lifecycle Category	Requirement	Reference
Policies	Appraisal and Scheduling	Ensure Federal email records are covered by an approved records schedule.	36 CFR 1225.10 36 CFR 1220.18
		Work with appraisal archivist to determine if agency records are appropriately scheduled.	36 CFR 1225.10 and 1225.12 44 USC 3303

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		Identify and apply appropriate General Records Schedules (Capstone, transitory, administrative, grant files, etc.) to email records. If more than one schedule applies, ensure copies are made with the required metadata and managed in appropriate systems.	36 CFR 1227 GRS
		If using Capstone GRS 6.1, complete and submit NARA Form 1005. The form must be approved by NARA before the GRS can be implemented.	36 CFR 1227 GRS 6.1 and Transmittal 25 Capstone FAQ, Training, and White Paper
		Conduct a functional analysis of Federal records held in email systems.	36 CFR 1225.12 (a)
		Issue disposition authorities through internal directives within six months of approval of the records schedule or GRS to ensure proper distribution and application of the schedule. The directive must cite the legal authority (GRS or SF 115 and item numbers) for each schedule item covering records.	36 CFR 1226.12(a)
	Management and Maintenance	Set policies that require any record created or received in a non-official account to be copied or forwarded to an official account within 20 days.	44 USC 2911
		Evaluate and monitor your records management program for effectiveness and compliance with applicable laws and regulations related to email management.	36 CFR 1220.18, see Evaluation
		Ensure policies describe the appropriate methods to identify and destroy temporary records that are eligible for disposal, and the application of records holds or legal freezes when required.	36 CFR 1236.20(b)
		Ensure policies explain how email records are associated with projects or case files as appropriate.	36 CFR 1225.12 NARA Bulletin 2013-02
		Develop and implement policies that support the classifying, safeguarding, and declassifying of national security information.	Executive Order 13526 32 CFR 2001
		Develop and implement policies and procedures to identify, protect, and manage emails which are essential records (formerly known as vital records).	36 CFR 1223

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	Transfer and Execute Disposition	Ensure policies describe methods to identify and effect the transfer of permanent records to the National Archives of the United States.	44 USC 3303
		Develop and implement policies describing the culling/removal of non-record email.	36 CFR 1222.16 NARA Bulletin 2013-02
		Develop procedures to enable the migration of email records, including attachments and their associated metadata, to new formats or storage media to avoid loss due to media decay or technology obsolescence.	36 CFR 1236.20 (a)
Systems	Appraisal and Scheduling	Associate email records with applicable record schedules. Utilizing agency business rules, systems must assign unique identifiers to records to facilitate management in an electronic system and include the ability to remove the record and move it to another system	Records Management Services (RMS) Document NARA Bulletin 2014-04 36 CFR 1236.20(b)
		Provide records management staff access to support the appraisal and scheduling of records.	36 CFR 1225.12
	Management and Maintenance	Ensure the content, context, and structure of the record accurately reflects the creator, their organization, and relationship to associated metadata.	36 CFR 1236.10 NARA Bulletin 2014-04 NARA Bulletin 2015-04
		Capture information with associated attributes in an electronic system.	RMS
		Ensure email messages conform to Request for Comments (RFC) 5322.	Proposed regulations 36 CFR 1236 NARA Bulletin 2014-04
		Maintain email records in acceptable formats.	36 CFR 1235 36 CFR 1236.20(b) NARA Bulletin 2014-04

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		Establish and incorporate records management controls in information systems.	36 CFR 1236.10 and 1236.12
		Support the assignment of email records with projects or case files as appropriate.	36 CFR 1225.12
		Prevent the unauthorized access, modification, or deletion of declared records, and ensure that appropriate audit trails are in place to track use of the records.	36 CFR 1236.20(b)(4)
		Ensure records are authentic and their integrity is protected against unauthorized alteration, deletion, or use.	36 CFR 1236.10(b) and(c)
		Support the classifying, safeguarding, and declassifying of national security information.	Executive Order 13526 32 CFR 2001
	Transfer and Execute Disposition	Associate records with the appropriate disposition authorities.	36 CFR 1236.20 36 CFR 1225.12 NARA Bulletin 2014-04
		Support the assignment of email records with projects or case files as appropriate.	36 CFR 1225.12 NARA Bulletin 2014-04
		Support the export of email records in acceptable file formats.	36 CFR 1235.50 NARA Bulletin 2014-04 NARA Bulletin 2013-02
		Support the export of metadata elements included in NARA Bulletin 2015-04.	36 CFR 1235.50 NARA Bulletin 2014-04

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Access	Appraisal and Scheduling	Email records must be usable and retrievable by appropriate staff to schedule and appraise the records.	36 CFR 1225.12 36 CFR 1236.20
		Emails that are Federal records must be kept for specific periods of time as mandated in records disposition schedules.	NARA Bulletin 2014-06
	Management and Maintenance	Federal records managed in live email systems must be retrievable to other staff as needed.	36 CFR 1225.12 36 CFR 1236.20
		Manage email records of current and former employees in a manner that supports searching in response to information requests, including FOIA and agency business needs.	36 CFR 1236.20 5 U.S.C. § 552
		Ensure the ability to search all or selected systems that manage or maintain email records (temporary and permanent) across the enterprise for content and/or attributes, in order to determine the existence and location of matching records.	RMS
		Ensure that all records are retrievable and usable for as long as needed to conduct agency business and to meet NARA-approved disposition authorities.	36 CFR 1236.12(b) and 1236.20(b)(6)
		Ensure that access to email records minimizes the risk of unauthorized additions, deletions, or alterations.	36 CFR 1222.34(d)(2)
		If a third party is contracted for storage or management, include provisions for export of messages to a new system and permanent records to the National Archives.	Proposed regulations 1236.12d, 36 CFR 1236.20

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Transfer and Execute Disposition	Transfer and Execute Disposition	Email records must be transferred in usable and retrievable formats.	36 CFR 1235 NARA Bulletin 2014-04
		Email records should include delimiters that indicate the beginning and end of each message and the beginning and end of each attachment, if any. Each attachment must be differentiated from the body of the message, and uniquely identified.	36 CFR 1235.50 NARA Bulletin 2014-04
		Agencies that use an email system that identifies users by codes or nicknames, or identifies addressees only by the name of a distribution list should include information with the transfer-level documentation to ensure identification of the sender and addressee(s)	36 CFR 1235.50 36 CFR 1236.22 NARA Bulletin 2014-04
		Email records must include labels to identify each part of the message (Date, To [all recipients, including cc: and bcc: copies], From, Subject, Body, and Attachment) including transmission and receipt information (Time Sent, Message Size, File Name, and similar information, if available).	NARA Bulletin 2014-04
		Ensure transfers of email records are described by the metadata elements included in NARA Bulletin 2015-04.	CFR 1235.50 NARA Bulletin 2015-04
Disposition	Appraisal and Scheduling	Identify and execute the transfer of permanent records to the National Archives of the United States based on NARA-approved records schedules.	44 U.S.C. 3303 36 CFR 1236.20(b)(7)
		Identify and destroy temporary records that are eligible for disposal.	36 CFR 1236.20(b)(7)
		Ensure policies account for essential records held in email accounts.	36 CFR 1222.16(a) 36 CFR 1225.12
	Management and Maintenance	Systems that manage email records must support the disposition of those records, according to the applicable NARA-approved records schedule.	36 CFR 1236.20(b)(7)

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	Transfer and Execute Disposition	Transfer email records or accounts to NARA in accordance with acceptable file formats.	36 CFR 1235.50
		Transfer all permanent digital or electronic records in digital or electronic form to the greatest extent possible.	44 USC 2904(d)
		Ensure transfers of email records consist of an identifiable, organized body of records (not necessarily a traditional series).	36 CFR 1235.50 NARA Bulletin 2014-04
		Ensure the appropriate transfer and disposition of national security information.	Executive Order 13526 32 CFR 2001
		Dispose of email records according to their NARA-approved records schedule.	36 CFR 1224.10 36 CFR 1225.18
		Dispose of emails that do not meet the definition of a record (non-records).	36 CFR 1225.18 (c)
		Apply records holds or legal freezes when required.	36 CFR 1236.20(b)