



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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For meeting of March 23, 2017
SUBMITTED LATE

May 25, 2016

MEMORANDUM

TO: The Commission

FROM: Ellen L. Weintraub
Commissioner

SUBJECT: FEC Email Management Policy

I have reviewed Ed Holder's May 6 memo and policy to the Commission regarding the Commission's Email Management Policy. I am in broad agreement with Ed's approach and thank him for his good work in bringing this important policy to us.

I do have one area of concern I would like to raise to my colleagues. Upon review of NARA's Bulletin 2013-02, I have come to the conclusion that some FEC officials should be added to the proposed list of designated FEC Capstone Officials. Bulletin 2013-02 provides the following guidance:

6. How do agencies identify Capstone email accounts?

When adopting the Capstone approach, agencies must identify those email accounts most likely to contain records that should be preserved as permanent. Agencies will determine Capstone accounts based on their business needs. They should identify the accounts of individuals who, by virtue of their work, office, or position, are likely to create or receive permanently valuable Federal records. NARA's Appraisal Archivists can assist agencies in helping to determine Capstone accounts. For example, these accounts may include

[H]eads of departments and independent agencies; their deputies and assistants; the heads of program offices and staff offices including assistant secretaries, administrators, and commissioners; directors of offices, bureaus, or equivalent; principal regional officials; staff assistants to those aforementioned officials, such as special assistants, confidential assistants, and administrative assistants; and career Federal

employees, political appointees, and officers of the Armed Forces serving in equivalent or comparable positions. (GRS 23, Item 5)

This guidance applies to all agencies, large and small. It strongly suggests to me that it is appropriate for us to reach a little deeper into the Commission's organizational chart.

I therefore propose that the list of FEC Capstone Officials consist of the following positions and anyone designated as acting in any of the following positions:

Commissioners
Executive Assistants

General Counsel
Deputy General Counsels
Associate General Counsels

Staff Director
Deputy Staff Directors
Assistant Staff Directors
Commission Secretary
Chief Compliance Officer
Reviewing Officer, Office of Administrative Review
Director, Office of Alternative Dispute Resolution
Director, Congressional, Legislative & Intergovernmental Affairs

Chief Information Officer
Deputy CIOs

Chief Financial Officer

Inspector General