



Consumer Financial
Protection Bureau

1700 G Street, N.W., Washington, DC 20552

April 17, 2019

The Honorable David S. Ferriero
Archivist of the United States of America
National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408

RE: Senior Agency Official Annual Report

Dear Mr. Ferriero:

In accordance with part 1, goal 1.1 and 1.2, and part 3, A4 of the August 24, 2012, Office of Management and Budget (OMB) / National Archives and Records Administration (NARA) Managing Government Records Directive (M-12-18), the Consumer Financial Protection Bureau (CFPB or the Bureau) conducted an evaluation of its records and information management program and has developed this Senior Agency Official (SAO) Annual Report. This SAO Annual Report documents the Bureau's continuous progress toward the successful implementation of the OMB/NARA Managing Government Record Directive (M-12-18).

Name of SAORM: Mrs. Kate Fulton
Position Title: Acting Chief Operating Officer
Address: Consumer Financial Protection Bureau
1700 G Street, NW Washington, DC 20552



1. What agencies, bureaus, components, or offices are covered by this report and your position as SAORM and which will be reporting separately? Please also indicate any that are new or have been changed due to reorganization or other circumstances.
 - The Consumer Financial Protection Bureau
2. Is your agency and its components making progress towards managing all permanent electronic records in electronic format by December 31, 2019? (M-12-18, Goal 1.1)
 - Yes No

Please explain your response:

The Bureau continues to make progress towards M-12-18, Goal 1.1. Since our last update, CFPB procured Microsoft Office 365 (O365) which will be our primary system to manage permanent electronic records in an electronic format. CFPB is preparing to implement O365, with the support of an implementation vendor, and we anticipate the rollout to occur in

2019.

3. Has your agency implemented a plan that aligns to the criteria and requirements published by NARA in its [Criteria for Successfully Managing Permanent Electronic Records](#) (March 2018)?

- Yes No

Please describe your specific plans or actions:

The Bureau's Records Officer completed the NARA's Federal Records and Information Management Training Program in 2013, and all Records and Information Management (RIM) staff continue to perform duties as described in OPM occupational series 0308, RIM. Furthermore, the RIM Office conducts training and workshops bimonthly as part of the Records Liaison Officers Program, reviews records disposition schedules, updates record file plans, digitizes hard copy permanent records, and transfers electronic permanent records to NARA annually.

4. As included in the Administration's [Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations](#) (June 2018), NARA will no longer accept paper records after December 31, 2022. Is your agency developing strategic plans, goals, objectives, and initiatives that will enable it to comply with this deadline?

The Reform Plan states:

Transition to Electronic Environment: Transition Federal agencies' business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration's acceptance of paper records by December 31, 2022. This would improve agencies' efficiency, effectiveness, and responsiveness to citizens by converting paper-based processes to electronic workflows, expanding online services, and enhancing management of Government records, data, and information.

- Yes No

Please explain your response:

The Bureau's Records and Information Management Office developed and implemented a uniform record management file code system that links the Bureau's records disposition schedules to a numerical labeling scheme that tracks records regardless of its originating office. This system mitigates the risk of unauthorized removal of records during elimination of offices and/or functions and re-organizing. In addition, the Records and Information Management Office annually digitizes all permanent hard copy Federal records as part of its standard operating procedures.

5. Is your agency utilizing [General Service Administration's Schedule 36](#) to procure solutions to assist in transitioning to an Electronic Environment?

- Yes No

Please explain your response

The Bureau Records and Information Management Office attended the 2-hour session on utilizing the newly structured records management under Schedule 36, learned about the NARA Universal ERM Requirement, and helpful tips on implementing electronic records management solutions.

6. Have you, as the SAORM, established or improved your agency procedures that ensure all incoming and outgoing senior officials receive briefings on their records management responsibilities including documenting their public service, use of personal email, and other recordkeeping requirements?

*Senior officials are the heads 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.

- Yes
- Changes were unnecessary (click [here](#) for your agency's 2017 report)
- No, changes are being considered but have not been made
- No

Please explain your response:

The Records and Information Management Office completed the following actions to ensure that incoming and outgoing senior officials receive informational briefings and training on their specific records management responsibilities. This includes documenting their public services, use of personal email, and other recordkeeping requirements.

- i. Conducts a records management briefing as part of their orientation;
- ii. Conducts groups and in person records management briefings;
- iii. Conducts web-based records management training annually;

- iv. Publishes Email, Text and Instant messaging guidance bi-annually; and
- v. Conducts records management departure briefings.

7. Have you, as the SAORM, ensured that your records management program has the support and resources it needs to be successful? (See [NARA Bulletin 2017-02: Guidance on Senior Agency Officials for Records Management](#))

- Yes No

Please explain your response:

The Bureau has recently approved a reorganization plan that aligned information and data compliance functions under a single office. The records and information management program will be strategically located in the Office of the Chief Data Officer as part of the reorganization. As such, the Bureau's Records Officer will receive enhanced support from senior leadership and be able to promote effective "best practices" in records and information management and ensure proper requirements exist across the Bureau.

8. Have you, as the SAORM, implemented an appropriate role-based records management training program that covers recordkeeping responsibilities for all staff including those with dedicated records management roles, Federal employees, contractors, senior executives and appointees? (See [NARA Bulletin 2017-01: Agency Records Management Training Requirements](#))

- Yes No

Please explain your response:

The Bureau implemented the following mandatory role-based training:

- i. Records Management Training for CFPB Senior Officials;
- ii. Records Management Training for CFPB Employees;
- iii. Records Management Training for Contracting Officer Representatives (CORs), and
- iv. Records Management Training for CFPB Contractors.

9. Have you, as the SAORM, taken steps to direct and support Records Management staff in implementing an evaluation or auditing process to ensure records management directives, policies, procedures, and retention schedules are being properly implemented?

- Yes No

Please explain your response:

As the Senior Agency Official for Records and Information Management, I continue to provide direct support and guidance to all records and information management activities, functions, and operations.

10. Do you need support from NARA to ensure a successful transition to fully electronic recordkeeping?

- Yes No

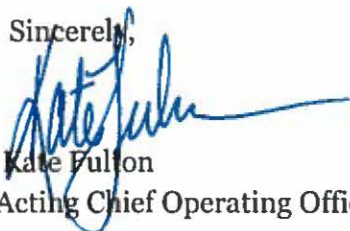
Please explain your response:

The Bureau will utilize its Technology and Innovation Office resources, NARA's Universal-Electronic Records and Information Management requirements, records file codes and schedules, and records and information management staff, as well as others to transition to fully electronic recordkeeping.

Contact information:

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Sincerely,



Kate Fullon
Acting Chief Operating Officer