NATIONAL ARCHIVES

OFFICE *of the* CHIEF RECORDS OFFICER

The National Archives and Records Administration (NARA) requires Senior Agency Officials for Records Management (SAORM) to provide an annual report demonstrating how agencies are handling important records management initiatives as identified by NARA.

NARA uses the reports to determine the overall progress of the Federal Government in managing its records and the transition away from paper to digital formats and to identify best practices and model solutions within Federal agencies.

The reporting period begins on <u>March 11, 2019</u> with reports due back to NARA no later than <u>April 19, 2019</u>.

NARA plans to post your 2018 SAORM report on the NARA website upon receipt. Please ensure that your agency's report is a publicly releasable version. This action is in the interest of transparency in Government and to promote collaboration and communication among agencies. NARA intends to list any non-responding agencies in a summary report and on the website.

Instructions for Reporting

- This template covers progress through December 31, 2018.
- Please be brief and precise in your answers. Limit answers to each question to no more than 500 words.
- Please complete the questions/items below and send the report to rmselfassessment@nara.gov. Include the words "SAORM annual report - [Agency Name] in the subject line of the email.
- If you are responsible for records management in multiple agencies, components, or bureaus, please determine how you will submit reports to NARA. While NARA prefers a comprehensive report, you may submit separate reports for each component.

Provide the following information (required):

Jason Gray
Chief Information Officer
550 12th Street, SW Washington, DC 20024

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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.**

Please provide list:

The United States Department of Education.

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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 Office 365 platform has been deployed enterprise-wide and will capture records at the point of creation. Simplified record retention policies are being enhanced to automate the identification of permanent and temporary records. This 21st century information management paradigm will include: (1) superseding custom administrative record retention policies with the General Records Schedule (GRS) to eliminate redundancies; (2) establishing a framework of mission unique functions to identify historically relevant permanent records from temporary mission critical information; and (3) using this framework to further simplify record retention policies and enable automation in and integration with Microsoft's Office 365. The Department hired fulltime contractor support in October 2018 to: (1) create an inventory of all GRS redundant record retention policies; (2) identify all mission specific record retention policies that will be superseded by a simplified framework; and (3) verify with Microsoft engineers the Office 365 requirements for record identification and retention.

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 explain your response:

Policies, procedures and training are in place to ensure permanent records in electronic systems are identified and custodians understand their responsibilities to preserve those records. Access and control of permanent records in electronic systems is confirmed via the Agency Records Officer reviewing all Information Technology Statements of Work as part of the IT Governance process to ensure system developers, contractors and partners integrate record management requirements into their IT acquisition activities. Disposition of the aforesaid records is ensured via the Agency Records Officer providing consultative services to system owners on including record retention policies into Privacy Impact Assessments (PIAs) and System of Record Notices (SORNs), which ensures permanent records are transferred to the National Archives when appropriate. The Department hired fulltime contractor support in October 2018 and developed a plan to: (1) refresh annual records management training and (2) replace Principal Office file plans with comprehensive information management strategies that will enable the Agency Records Officer to verify permanent records are identified, managed and regularly transferred to the National Archives.

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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 (include specific goals and example metrics):

In June 2018, the Agency Records Officer visited four regional offices (Dallas, Chicago, New York and Atlanta) to provide basic records management training and to assess compliance with the 2022 deadline. A report identified challenges to and solutions for the transition, which include the following for calendar year 2019: (1) develop a strategic plan for a Department-wide migration of paper legacy records into the Federal Records Center; (2) complete pilot partnerships with the Federal Records Center Program's national leadership for (a) packing and shipping services, (b) short and long term scanning solutions for Principal Offices with regional presence; (3) partner with the Office for Civil Rights and Federal Student Aid to modernize paper-based processes for a 2022 transition.

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 strategy detailed in the answer to Question 5 will leverage, where appropriate, GSA Schedule 36 for implementation.

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:

All new employees receive a records and information management briefing during orientation. Capstone Officials are given an additional briefing by the Agency Records Officer to reinforce the requirements associated with creating, receiving and managing permanent records. Additionally, Capstone Officials are issued regular reminders of their responsibilities throughout their tenure. At the end of tenure, all employees must certify their records have been identified, captured and only their personnel-related information may be copied and removed upon separation. In calendar year 2019, the Department will submit a records disposition schedule expanding General Records Schedule 6.1 to cover all records created and received by Capstone Officials.

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 Department's Federal Records Management Program is staffed by both Federal (3) and contractor (2) staff that completes tasks defined by a "programmatic strategic objectives document," which aligns to annual performance plans and contractor statements of work. With those resources the Program made substantial progress with implementing the Managing Government Records Presidential Directive (M-12-18), which included: (1) Partnerships with the Chief Information Officer, the General Counsel and Microsoft were established to begin modernization of the Department's records retention policies and configure Office 365 with those policies; (2) A prototype aggregate records retention policy was developed for the Inspector General, which consolidated existing policy items by two thirds; (3) A plan was developed to apply the National Archives modernized General Records Schedules; once implemented the Department's record retention policies will be significantly reduced.

The Program aggressively managed the Department's information management cycle to include; directing the nation-wide physical relocation of 1800 cubic feet of inactive papers records; reviewing information technology statements of work to ensure records management compliance; redesigning guidance for and managing the records management process by which employees depart. Further, the Program also identify 23,000 cubic feet of eligible temporary records for destruction and terabytes of permanent electronic records eligible for legal transfer to the National Archives. In the

area of compliance, the Program prepared for an internal Inspector General audit and readied principal offices for a National Archives records management inspection.

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 Department's Federal Records Management Program provides the following engagement and education activities that support NARA Bulletin 2017-01: (1) mandatory annual Department-wide training for Federal and contractor staff; (2) a records and information management new employee orientation briefing; (3) an in person onboarding briefing for Capstone Officials with the Agency Records Officer; (4) custom training for the Principal Office records liaison officers; (5) employee separation training; and (6) ad hoc briefings as needed.

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:

The Department hired fulltime contractor support in October 2018 to begin planning the replacement of its triannual Department-wide assessments in 2019 with Principal Office level information management strategies that will be issued annually by the Agency Records Officer to verify the following: (1) full compliance with all applicable records management laws and regulations; (2) training verification matrix to ensure all employees, contractors and partners receive annual records management training; (3) data and information inventories aligned to record retention schedules; and (4) an executable timetable for transferring permanent records to the National Archives and destroying eligible temporary records.

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

☐ Yes
☐ No

Please explain your response:

In order to fully transition to electronic recordkeeping, the Department must develop and implement simplified record retention policies. Therefore, the Agency Records Officer will partner with the Department's National Archives appraisal team in calendar year 2019 to ensure draft policies are reviewed and submitted on or before December 31, 2019, with the hope approved policies will be signed by the Archivist of the United States by December 31, 2020.